



**City of Moreno Valley**

**Final Environmental Impact Report for the  
MoVal 2040: Moreno Valley Comprehensive Plan Update,  
Housing Element Update, and Climate Action Plan**

SCH # 2020039022

May 20, 2021



# MoVal 2040 Project EIR

## Letters of Comment and Responses

The following letters of comment were received from agencies, organizations, and individuals during the public review period (April 2, 2021 to May 17, 2021) of the Draft EIR. A copy of each comment letter along with corresponding staff responses is included here. Some of the comments did not address the adequacy of the environmental document; however, staff has attempted to provide appropriate responses to all comments as a courtesy to the commenter. The comments received did not affect the conclusions of the document. Where responses to comments required minor revisions to the Draft EIR, changes to the text are shown in ~~strikeout~~, underline format. Such format shows deletions as ~~strikeout~~ text and additions as underline text.

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Letter A-1



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*"The mission of Moreno Valley Unified School District is to provide an equitable education for all students to be prepared for college and/or a viable career path for a successful life."*

April 7, 2021

Manuel Mancha  
City of Moreno Valley  
Community Development Department  
14177 Frederick Street  
P.O. Box 88005  
Moreno Valley, CA 92552

Email: manuelm@moval.org



Project: Notice of Preparation of a Program Environmental Impact Report for MoVal 2040: The Moreno Valley Comprehensive General Plan Update, Housing Element Update, and Climate Action Plan

Dear Mr. Mancha,

The Moreno Valley Unified School District (District) appreciates the opportunity to review the NOP for MoVal 2040: The Moreno Valley Comprehensive General Plan Update, Housing Element Update, and Climate Action Plan

The District's focus continues to be the health and well-being of our students and staff, specifically to air and noise pollution as a result of an increase in traffic that may negatively impact the School District.

Additionally, it should be noted that there will be developer impact fees associated with this project, payable to the Moreno Valley Unified School District. It is highly suggested that contact should be made with our Facilities and Planning Department's Demographics Technician, Cheryl Acevedo ([cacevedo@mvusd.net](mailto:cacevedo@mvusd.net)) prior to processing a certificate of compliance and payment of fees – as the following fees are subject to change.

For Industrial/Commercial Projects, these fees are currently \$.66 per square foot.

For Residential Development Projects, these fees are currently:

- > New Residential: \$4.64/sq. ft.
- > Room Additions/Conversions: </= 499 sq. ft. (no fees)
- > Room Additions/Conversions: 500 sq. ft. + = \$4.08/sq. ft.
- > Stand-alone Accessory Dwelling Units: 750 sq. ft. +, fees are calculated based on a percentage of the existing main residential dwelling unit
- > Stand-alone Accessory Dwelling Units: </= 749 sq. ft. (no fees)

Please keep us informed as to the City's progress in this matter, and any notifications relating to this.

Sincerely,

Samer Alzubaidi, Director  
Facilities Planning & Development  
salzubaidi@mvusd.net

- 1 Introductory comment. See responses to specific comments below.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Impacts associated with noise are presented in Section 4.13 Noise of the Draft EIR. Impacts associated with transportation are presented in Section 4.16 Transportation of the Draft EIR.
- 3 As future development is proposed, development impact fees would be determined as part of a future site-specific discretionary review.
- 4 Public notice will be provided for future actions associated with the project.



**South Coast  
Air Quality Management District**

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

Letter A-2

SENT VIA E-MAIL:

[chriso@moval.org](mailto:chriso@moval.org)

Chris Ormsby, AICP, Senior Planner  
City of Moreno Valley  
Community Development Department  
14177 Frederick Street  
Moreno Valley, California 92553

May 14, 2021

**Draft Program Environmental Impact Report (PEIR) for Proposed  
Moreno Valley Comprehensive General Plan Update (MoVal 2040) Project  
(Proposed Project) (SCH No.: 2020039022)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Moreno Valley is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments on the air quality mitigation measures and health risk reduction strategies should be included in the Final PEIR.

Based on the Draft PEIR, the Proposed Project consists of updates to the City of Moreno Valley's General Plan to develop policies and land use designations to guide future development through 2040. During this planning period, the Proposed Project anticipates a net new growth of 22,052 residential units and 50,362,604 square feet of non-residential uses such as commercial, retail, office, and light industrial uses<sup>1</sup>.

Based on a review of the Draft PEIR and supporting documents, South Coast AQMD staff has three main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. **Recommended Revisions to the Existing Air Quality Mitigation Measure:** The Draft PEIR includes an air quality mitigation measure (MM AQ-1), which requires future development projects prepare and submit project-level construction air quality impacts analyses and mitigation measures<sup>2</sup>. South Coast AQMD staff recommends that the Lead Agency include additional information on subsequent, project-level localized air quality impacts analyses and construction mitigation measures for cleaner off-road and on-road construction equipment that can and should be implemented by future development projects as part of MM AQ-1 in the Final PEIR.
2. **Additional Project-Level Air Quality Mitigation Measures:** The Draft PEIR serves as the first-tier, programmatic level analysis that can provide guidance to subsequent, project-level environmental analyses. To facilitate this, South Coast AQMD staff recommends

<sup>1</sup> Draft PEIR, Chapter 3 Project Description, Pages 3-26 to 3-27.

<sup>2</sup> Draft PEIR, Chapter 4.3 Air Quality, Pages 4.3-25 to 4.3-26.

- 1 Comment 1 provides a summary of South Coast AQMD staff's three main comments. Please refer to the following responses.

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that the Final PEIR include additional project-level mitigation measures for on-road mobile sources in the Final PEIR.

- 3. Health Risk Assessment for Future Sensitive Land Use Development Projects Near Freeways and Other Sources of Air Pollution and Health Risk Reduction Strategies: In the Draft PEIR, the Proposed Project would result in new development of sensitive land uses within 500 feet of freeways such as State Route 60<sup>3</sup>. To provide guidance for subsequent, project-level environmental analyses, South Coast AQMD staff recommends that the Lead Agency include a discussion on mobile source health risk assessments and health risk reduction strategies in the Final PEIR.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Air Quality Specialist, at [amullins@aqmd.gov](mailto:amullins@aqmd.gov), should you have any questions or wish to discuss the comments.

Sincerely,  
*Lijin Sun*  
 Lijin Sun, J.D.  
 Program Supervisor, CEQA IGR  
 Planning, Rule Development & Area Sources

Attachment  
 LS:AM  
 RVC210406-01  
 Control Number

1  
 Cont.

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<sup>3</sup> Draft PEIR, Chapter 4.3 Air Quality, Pages 4.3-19 to 4.3-20.

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## ATTACHMENT

**1. Recommended Revisions to the Existing Air Quality Mitigation Measure**

In the Draft PEIR, the Lead Agency included a project-level air quality mitigation measure (MM AQ-1) that future development projects can and should implement. South Coast AQMD staff recommends that the Lead Agency incorporate the following revisions to MM AQ-1 in the Final PEIR. The recommended revisions will provide more details on subsequent, project-level localized air quality impacts analyses and mitigation measures for cleaner construction equipment and facilitate CEQA streamlining and tiering as an option from the Final PEIR by subsequent, project-level environmental analyses, where appropriate. The recommended additions and changes to MM AQ-1 are shown in underline and ~~strike through~~, respectively.

*CEQA Air Quality Localized Significance Thresholds Impact Analysis*

South Coast AQMD has developed localized significance thresholds. Future development projects should evaluate and quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA localized significance thresholds (LSTs)<sup>4</sup> to determine the level of significance for the projects' localized air quality impacts. The localized CEQA air quality impact analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

*Air Quality Mitigation Measures for Cleaner On-Road and Off-Road Construction Equipment*

**AQ-1:** Applications for future development, wherein the Director of Community Development or his or her designee has determined a potential for air quality impacts associated with construction, shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City for review and approval. The Director of Community Development or his or her designee shall make this determination based on the size of the project, whether the project would require a transportation impact analysis, or other criteria. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality regional and local impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's adopted regional and localized construction CEQA thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions could include, but are not limited to:

- Require fugitive-dust control measures that exceed SCAQMD's Rule 403 requirements, such as:
  - Use of nontoxic soil stabilizers to reduce wind erosion.
  - Apply water every four hours to active soil-disturbing activities.

<sup>4</sup> South Coast AQMD's guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

- 2 South Coast AQMD has provided recommended revisions to the existing air quality mitigation measures. The first suggested revision is related to CEQA air quality localized significance thresholds (LST) impact analysis. The City's process for evaluation of future development that could be implemented under the 2021 GPU would include environmental review and documentation pursuant to CEQA. This includes future project-level evaluation of a project in relation to the South Coast AQMD's LSTs. The following text has been added to Section 4.3.5.2(b) of the EIR to specifically identify this future requirement: "Further, as a part of the process for the evaluation of future development projects, air quality impacts would be evaluated using SCAQMD guidelines, regional emissions thresholds, and localized significance thresholds (LSTs). Projects that would exceed the SCAQMD significance thresholds would be required to implement project-level reduction measures to reduce potential impacts."

The second suggested revisions are related to MM AQ-1. The suggested revisions include project-level mitigation measures. The measure that encourages the use of Tier 4 Final construction equipment has been added to MM AQ-1. However, the suggested additions related to project-level detailed contractor requirements and the use of ZE and NZE trucks were not included, since these are detailed project-level requirements that would not be applicable or feasible at the plan level of analysis. Additionally, while these measures could reasonably apply to very large scale projects, it would not be appropriate for smaller projects due to potential costs to implement. These measures may be considered when future project-level construction-related air quality impacts are evaluated, as appropriate.

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- Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Require that construction equipment equal to or greater than 50 horsepower be electrically powered or alternatively fueled. At a minimum, require the use of construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 Final (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. Include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment. Require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that construction equipment cannot meet the Tier 4 Final engine certification, the project representative or contractor must demonstrate through future studies with written findings supported by substantial evidence that is approved by the lead agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.
- Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board (CARB)'s adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), and ensure that supportive infrastructure will be available for ZE/NZE trucks. At a minimum, require the use of 2010 model year<sup>8</sup> that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the future development projects, the lead agency should require that operators maintain records of all trucks associated with the future development projects' construction and make these records available to the lead agency upon request. The records will serve as evidence to prove

<sup>8</sup> CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/m3prog/anddiesel/ordiesel.htm>



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that each truck called to the future development projects during construction meets the minimum 2010 model year engine emission standards. Alternatively, the lead agency should require periodic reporting and provision of written records by contractors working on the future development projects and conduct regular inspections of the records.

- Ensure that construction equipment is properly serviced and maintained to the manufacturer’s standards.
- Limit nonessential idling of construction equipment to no more than five consecutive minutes.
- Limit on-site vehicle travel speeds on unpaved roads to 15 miles per hour.
- Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area.
- Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufacturers can be found on the SCAQMD’s website.

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Cont.

**2. Additional Project-Level Air Quality Mitigation Measures**

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate significant adverse impacts. The Proposed Project is a blueprint for the City’s future development. The Draft PEIR for the Proposed Project serves as the first-tier, programmatic level analysis that can provide guidance to subsequent, project-level environmental analyses. Therefore, South Coast AQMD staff recommends that the Lead Agency include the following project-level mitigation measures in the Final PEIR to further reduce emissions from on-road mobile sources by future development projects that generate and attract heavy-duty diesel-fueled trucks. These mitigation measures will facilitate implementation of the Proposed Project’s Environmental Justice Actions (EJ. 1-D<sup>6</sup> and EJ. 1-E<sup>7</sup>) and support the efforts in implementing the control measures and strategies identified in the 2016 Air Quality Management Plan<sup>8</sup>.

3

Project-level air quality mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider and include in the Final PEIR for future distribution and warehouse development projects may include the following:

- To facilitate implementation of the Proposed Project’s Environmental Justice Action EJ.1-D, which requires the City of Moreno Valley work with the distribution and warehousing business community to plan for zero emission trucks and vans, the Lead Agency should require the use of ZE or NZE heavy-duty trucks by future distribution and warehouse development projects during operation such as trucks with natural gas engines that meet CARB’s adopted optional NOx emission standard of 0.02 g/bhp-hr, if and when feasible. Given the state’s clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean

<sup>6</sup> Draft MoVal 2040 General Plan, Section 8 Environmental Justice Page 8-9.

<sup>7</sup> Draft MoVal 2040 General Plan, Section 8 Environmental Justice Page 8-9.

<sup>8</sup> South Coast Air Quality Management District, 2017, March. Final 2016 Air Quality Management Plan. <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>.

3 South Coast AQMD has provided additional recommended project-level air quality mitigation measures related to future distribution and warehouse projects. These measures have been added, for the most part, to Section 4.3.5.2(b) of the EIR. Portion of the first suggested bullet point have not been included, since these are detailed project-level requirements that would not be applicable or feasible at the plan level of analysis. These measures may be considered when future project-level operational-related air quality impacts associated with distribution and warehouse projects are evaluated, as appropriate.

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Trucks Rule<sup>9</sup> and the Heavy-Duty Low NOx Omnibus Regulation<sup>10</sup>, ZE and NZE trucks will become increasingly more available to use, especially through. The Lead Agency can and should require future distribution and warehouse development projects to have a phase-in schedule to incentivize the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs. At a minimum, require the use of 2010 model year<sup>11</sup> that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of PM and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Require future distribution and warehouse development projects to include an evaluation of sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the subsequent, project-level environmental analyses, where appropriate. Future distribution and warehouse development projects can and should also include the requirement in applicable bid documents, purchase orders, and contracts. Owners and operators of future distribution and warehouse development projects shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections at the future distribution and warehouse development projects.

- Limit the daily number of trucks allowed at the future distribution and warehouse development projects to the levels analyzed in the subsequent, project-level environmental analyses for these projects. If higher daily truck volumes are anticipated to visit the site, additional analysis should be done through CEQA prior to allowing this higher activity level.
- To help facilitate implementation of the Proposed Project's Environmental Justice Action EJ.1-E, which requires the City of Moreno Valley to study the feasibility of promoting electric vehicles (EV) and requiring minimum supporting EV infrastructure, the Lead Agency should use the results of the feasibility study to help inform the provision of EV charging stations or at a minimum, require future distribution and warehouse development projects to provide the electrical infrastructure and electrical panels, which should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

<sup>9</sup> CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>

<sup>10</sup> CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/bp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>

<sup>11</sup> CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/mprog/ordiesel/ordiesel.htm>

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Project-level air quality mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider and include in the Final PEIR for future distribution and warehouse development projects may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Design considerations that the Lead Agency should consider and include in the Final PEIR for future distribution and warehouse development projects to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design a future distribution and warehouse development project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the project site.
- Design a future distribution and warehouse development project such that any check-in point for trucks is inside the project site to ensure that there are no trucks queuing outside.
- Design a future distribution and warehouse development project to ensure that truck traffic inside the project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the future distribution and warehouse development project site.

**3. Health Risk Assessment (HRA) Analysis for Future Sensitive Land Use Development Projects Near Freeways and Other Sources of Air Pollution and Health Risk Reduction Strategies**

Notwithstanding the court rulings, South Coast AQMD staff recognizes that the lead agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD staff's concern about the potential public health impacts of siting sensitive populations within close proximity of freeways or other sources of air pollution, South Coast AQMD staff recommends that, prior to approving future development projects, the lead agency consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

*HRA Analysis*

Implementation of the Proposed Project would result in new development of sensitive land uses within 500 feet of freeways such as State Route 60. To facilitate implementation of the Proposed Project's Environmental Justice Policy EJ.1-3<sup>12</sup>, which requires new development that would locate sensitive uses adjacent to sources of toxic air contaminants (TAC) to be designed to minimize any potential health risks, South Coast AQMD staff recommends that the Lead Agency

<sup>12</sup> Draft MoVal 2040 General Plan, Section 8 Environmental Justice, Page 8-9.

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4 The first three suggested distribution and warehouse measures have been added to Section 4.3.5.2(b) of the EIR. However, "Maximum use of solar energy by installing solar energy arrays" has been revised to state "Promote and incentivize solar installations on new and existing industrial and warehousing facilities through partnerships with energy providers", which is CAP GHG reduction measure I-2. The five recommended measures related to distribution and warehouse truck traffic have been added to Section 4.3.5.3(b) of the EIR.

5 Health risks associated with placing sensitive receptors within 500 feet of a freeway is provided in Section 4.3.5.3(b) of the EIR. Additional language has been added to the section to state that, as a part of project review and documentation, project-level health risk reduction strategies for sensitive land uses in close proximity to freeways will be evaluated, and if necessary, a site-specific mobile source Health Risk Assessment analysis would be conducted following SCAQMD guidance.

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include a discussion on mobile source HRA analysis<sup>13</sup> in the Final PEIR to provide guidance for subsequent, project-level environmental analyses. This discussion will demonstrate that the Lead Agency has adequately considered the potential health risk impacts from implementing the Proposed Project and that a subsequent, project-level HRA analysis will be completed to disclose health risk impacts at a later stage. Furthermore, the Lead Agency should include the following health risk reduction strategies in the Final PEIR as guidance for future sensitive land use development projects that will be sited in close proximity to freeways or other sources of air pollution.

5  
Cont.

*Health Risk Reduction Strategies*

Many strategies are available to reduce exposures, including, but not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters<sup>14</sup>, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

6

6 A discussion of the strategies that would reduce exposure in included in Section 4.3.5.3(b) of the EIR. These strategies include planting vegetation between the receptor and the freeway, constructing barriers between the receptor and the freeway, and installing newer electrostatic filters. Additional language regarding the use of MERV-13 filters has been added to the section. South Coast AQMD comments regarding costs are noted.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final PEIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to

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7 The comment provides conclusory statements. Please refer to the previous responses.

<sup>13</sup> South Coast AQMD, "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis." Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

<sup>14</sup> This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ana.12013>

LETTER

RESPONSE

Chris Ormsby

May 14, 2021

decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended revisions to existing air quality mitigation measure and additional new air quality mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final PEIR (CEQA Guidelines Section 15091).

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Letter A-3



SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS  
706 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017  
(213) 236-1800  
www.scag.ca.gov

May 17, 2021

Mr. Chris Ormsby, Senior Planner  
City of Moreno Valley, Community Development Department  
14177 Frederick Street  
Moreno Valley, California 92553  
E-mail: [chriso@moval.org](mailto:chriso@moval.org)

RE: SCAG Comments on the Draft Environmental Impact Report (DEIR) for the Moreno Valley Comprehensive General Plan Update [SCAG NO. IGR10145]

REGIONAL COUNCIL OFFICERS

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- First Vice President:  
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- Community, Economic & Human Development:  
Jorge Marquez, Covina
- Energy & Environment:  
David Pollock, Moorpark
- Transportation:  
Sean Ashlan, Downey

Dear Mr. Ormsby,

Thank you for submitting the Notice of Availability of the Draft Environmental Impact Report (DEIR) for the Moreno Valley Comprehensive General Plan Update ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. The proposed project consists of planning for the 67 square miles (SQ. MI) within the City limits and Sphere of Influence. The project is a comprehensive update to all elements of the General Plan, and the addition of two new elements, Economic Development and Healthy Communities. Buildout projections include 48,303 new residents, 20,992 new households, and 38,869 new jobs.

Based on SCAG staff's review, the proposed project does not reference the most recently adopted 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal) and does not include the correct 6<sup>th</sup> Cycle RHNA Allocation for the City of Moreno Valley. SCAG staff comments are detailed in the attachment to this letter.

When available, please send the Final Environmental Impact Report to [IGR@scag.ca.gov](mailto:IGR@scag.ca.gov). If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or [IGR@scag.ca.gov](mailto:IGR@scag.ca.gov). Thank you.

Sincerely,

Rongsheng Luo  
Acting Manager, Compliance and Performance Monitoring

1 1 Introductory comment. See responses to specific comments below.

May 17, 2021  
Mr. Ormsby

SCAG No. IGR10145  
Page 2

**COMMENTS ON THE NOTICE OF AVAILABILITY OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
MORENO VALLEY COMPREHENSIVE GENERAL PLAN UPDATE [SCAG NO. IGR10145]**

**SUMMARY**

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies.

Based on SCAG staff review, the proposed project does not reference the most recently adopted 2020 Connect SoCal. In addition, while the 6<sup>th</sup> Cycle RHNA Allocation numbers for the City of Moreno Valley is correct in the Draft EIR, it is not consistent in the Draft Moreno Valley 2021-2029 Housing Element.

**CONNECT SOCIAL GOALS**

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

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Cont.

May 17, 2021  
Mr. Ormsby

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Page 3

**Connect SoCal Strategies**

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

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**SCAG Staff Comments**

SCAG staff recommends that you review 2020 Connect SoCal and consider its adopted goals and policies when finalizing the proposed project.

**DEMOGRAPHICS AND GROWTH FORECASTS**

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG's 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California's GHG reduction target, approved by the California Air Resources Board (CARB) in accordance with state planning law. Connect SoCal's Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

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2 The City initiated the MoVal 2040 project in October 2019, prior to certification of the latest RTP/SCS in September 3, 2020. Therefore, updating the project with information from the latest RTP/SCS certified in September 3, 2020 was not feasible due to the substantial amount of work that had already been completed based on the RTP/SCS that was available at the time the City began the MoVal 2040 project.



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Mr. Ormsby

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	Adopted SCAG Region Wide Forecasts				Adopted City of Moreno Valley Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	215,147	235,490	246,068	266,814
Households	6,333,458	6,902,821	7,170,110	7,633,451	57,735	65,182	68,997	76,199
Employment	8,695,427	9,303,627	9,566,384	10,048,822	43,158	55,615	59,411	64,916

**SCAG Staff Comments**

Table 3-3 SCAG Growth Projections for Moreno Valley on page 3-25 indicates that the Draft EIR population, housing, and employment trends and forecasts were based on the SCAG 2016 RTP/SCS Growth Forecasts. SCAG staff recommends the most recently adopted growth forecast from the 2020 Connect SoCal be used for any analyses in the MoVal 2040 Project EIR.

**MITIGATION**

**SCAG Staff Comments**

SCAG staff recommends that you review the [Final Program Environmental Impact Report \(Final PEIR\)](#) for Connect SoCal for guidance, as appropriate. SCAG's Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

**REGIONAL HOUSING NEEDS ALLOCATION**

On March 4, 2021 SCAG's Regional Council adopted the [6<sup>th</sup> cycle Final Regional Housing Needs Assessment \(RHNA\) Allocation Plan](#) which covers the planning period October 2021 through October 2029. The 6<sup>th</sup> cycle Final RHNA allocation for the applicable jurisdiction is below.

SCAG 6 <sup>th</sup> Cycle Final RHNA Allocation for City of Moreno Valley	
Very low income	3,779
Low income	2,051
Moderate income	2,165
Above moderate income	5,632
Total RHNA Allocation	13,627

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3 Section 4.3 Air Quality has been revised to expand mitigation based on comments received from the Southern California Air Quality Management District. The EIR provides satisfactory mitigation based on the programmatic evaluation of the MoVal 2040 project.

4

4 The City submitted the Housing Element Update to the State Housing and Community Development Department for 60-day review prior to adoption of the 6th cycle Final Regional Housing Needs Assessment (RHNA) Allocation Plan. The Housing Element Update has been updated to reflect the numbers presented in the adoption of the 6th cycle Final RHNA Allocation Plan.

May 17, 2021  
Mr. Ormsby

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Sixth cycle housing elements are due to the California Department of Housing and Community Development (HCD) by October 15, 2021. SCAG encourages jurisdictions to prepare the draft housing element in advance of the due date to ensure adequate time to address HCD comments and adopt a final housing element. Jurisdictions that do not have a compliant housing element may be ineligible for certain State funding and grant opportunities and may be at risk for legal action from stakeholders or HCD.

**SCAG Staff Comments**

*Table 3-2 Moreno Valley RHNA 2021-2029 on Page 3-20 of the MoVal 2040 Project EIR reflects the above allocation but RHNA allocation numbers are incorrect in the Draft Moreno Valley 2021-2029 Housing Element. SCAG staff recommends that these numbers are corrected in the Draft Moreno Valley 2021-2029 Housing Element, including Table 3-16 City of Moreno Valley RHNA 2021-2029 on page 38.*

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Cont.

Letter O-1



**Riverside County Farm Bureau, Inc.**  
21160 Box Springs Road, Suite 102, Moreno Valley, California 92557-8706  
Telephone (951) 684-6732 FAX (844) 273-9796  
E-mail [President@RiversideCFB.com](mailto:President@RiversideCFB.com) - Website [www.RiversideCFB.com](http://www.RiversideCFB.com)  
Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

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April 27, 2021

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City of Moreno Valley  
Chris Ormsby, Senior Planner  
14177 Frederick St  
Moreno Valley, CA 92553

RE: Riverside County Farm Bureau Property APN's 256-200-002, 003, 004, comments on the City of Moreno Valley 2021 General Plan Update and 2021-2029 Housing Element update.

Dear Mr. Ormsby,

The Riverside County Farm Bureau is writing to you regarding our property, located at 21160 Box Springs Road. The Directors at the Farm Bureau have just recently learned the City of Moreno Valley is in the process of updating its General Plan and Housing Element.

The Farm Bureau would like the City of Moreno Valley to consider changing our property zone from Residential Office/R-15 to R-30 to better reflect the existing land use of the area. This property is within close proximity to the University of California, Riverside, the Moreno Valley Mall and the I-215/I-60 freeway corridor. The R-30 designation for this property could be a benefit to the growing economy of the city allowing for needed housing.

The Farm Bureau has resided and conducted our business at 21160 Box Springs Road, Moreno Valley since 1964. We had planned to continue building and create an office hub on the 9.32 acres, however, only two buildings were finished. We are not looking to leave the city, but would like to seek an area more compatible for our business.

As the City of Moreno Valley has developed and grown, single family housing developments, elementary schools and apartment complexes have been built around our property. We have dealt with the pains of having open land in a populated area with vandalism and illegal dumping. Over the past few years, we have had several parties reach out to us showing an interest in the property for apartments. These three lots could help with the cities need for housing requirements. This property does not seem suitable for offices any longer.

1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE



The Riverside County Farm Bureau is an independent, non-governmental, voluntary membership organization, which represents the interests of agriculture in Riverside County. Our organization has been in Riverside County for over 100 years and has over 1,000 members. The Farm Bureau Directors thank you for your time and consideration regarding this matter.

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Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Schmid'.

Richard Schmid  
President

- cc: Dr. Yxstian Gutierrez, Mayor  
Victoria Baca, Mayor Pro Tem  
David, Marquez, Councilman  
Ulises Cabrera, Councilman  
Mike Lee, City Manager  
Patty Nevins, City Planning Official

Letter O-2

**Law Office of Abigail Smith  
A Professional Corporation**

2305 Historic Decatur Road, Suite 100, San Diego, CA 92106

Abigail A. Smith, Esq.  
Email: [absby@osadlaw.com](mailto:absby@osadlaw.com)  
Telephone: (951) 908-8595  
Facsimile: (951) 972-8488

*VIA E-MAIL ONLY*

May 17, 2021

Chris Ormsby, AICP, Senior Planner  
Community Development Department  
City of Moreno Valley  
14177 Frederick Street  
Moreno Valley, CA 92553  
[chriso@moval.org](mailto:chriso@moval.org)

**Re: Public Comments—MoVal 2040 Draft Environmental Impact Report**

Dear Mr. Ormsby:

Please accept these comments on behalf of the Sierra Club regarding the City of Moreno Valley’s MoVal 2040 Project including the Draft Environmental Impact Report (“DEIR”) and Climate Action Plan (“CAP”). The MoVal 2040 Project (“Project”) constitutes a comprehensive update to the City’s existing 2006 General Plan. The General Plan Update (“GPU”) replaces the 2006 General Plan, adopts new policies, and creates new land use designations for certain areas of the City.

The purpose of this letter is to inform the City that the DEIR is legally inadequate in that the DEIR fails to comply with the requirements of the California Environmental Quality Act (“CEQA”). The DEIR must be revised and recirculated as detailed below. We also urge the City to delay any public hearings on the GPU Project until the City has fully considered public comments on the DEIR and until a Final EIR can be circulated for public review and comment.

Among other things, the DEIR and CAP must be revised with respect to mitigation of greenhouse gas emissions. Because future implementing projects will rely on the Project’s EIR and CAP for “streamlining” purposes, it is essential that they contain mandatory, enforceable measures aimed at achieving actual reductions in greenhouse gas emissions. As proposed, the DEIR and CAP contain “policy” measures that are “aspirational” rather than compulsory. And, as the GPU will govern the City’s development through year 2040, it is essential that verifiable reductions in GHG emissions occur, consistent with State laws, regulations, and Executive Orders aimed at reducing GHG emissions in that timeframe.

1 Introductory Comment. See responses to specific comments below.

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Additionally, the DEIR must be revised to reflect a finding of "significance" in both the areas of air quality and energy impacts, and appropriate mitigation must be adopted. The DEIR proposes not a single air quality or energy mitigation measure based on the specious conclusions that impacts are less than significant.

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**A. The DEIR's Environmental Baseline Is Not Supported by Substantial Evidence**

CEQA requires "a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation [NOP] is published..." State CEQA Guidelines, § 15125(a). Here, the GPU DEIR repeatedly states that the Project's environmental impacts are less than significant "compared to buildout of the existing 2006 General Plan." See, e.g., DEIR p. 4.16-29. This environmental baseline is flawed in that it fails to account for the vast number of industrial warehouse projects approved in the City in the last 10-15 years, including the City's approval in August 2015 of the 40 million square foot World Logistics Center ("WLC") project, which will be one of the largest industrial warehouse complexes in the United States. The City must accurately disclose the baseline for analysis of impacts, accounting for actual growth in the City since the adoption of the 2006 General Plan.

At the very least, the DEIR must be revised to disclose the data and information comprising the "baseline" for analysis of impacts. For instance, we could not locate a list of "cumulative projects" in the DEIR, or any list of reasonably foreseeable future projects pending approval; and, while in some places, the DEIR asserts it is relying on a "2018" baseline, we still could not locate a list of projects or data that would inform the reader as to what assumptions are included in that "2018 baseline."

Accordingly, the DEIR does not provide substantial evidence to support its environmental baseline.

**B. The Programmatic EIR Must Contain Detailed Analysis of Impacts and Enforceable Mitigation for Significant Impacts**

Again the DEIR lacks information about the assumptions and data used to make conclusions about the GPU's environmental impacts. The DEIR repeatedly disclaims the need for analysis of the impacts associated with buildout of the subject Planning Area, as it asserts it is a programmatic document and that more detailed environmental review may be performed for future implementing projects. This is inadequate. CEQA requires that a program EIR provide analysis of impacts "as specifically and comprehensively as possible." Guidelines, § 15168 (a)(c)(5). Among other things the program EIR must consider "cumulative impacts that might be slighted in a case-by-case analysis." Guidelines, § 15168(b)(1)-(2). Importantly, "[d]esignating an EIR as a program EIR also does not by itself decrease the level of analysis otherwise required in the EIR." *Friends of Mammoth v. Town of Mammoth Lakes Redevelopment Agency* (2000) 82 Cal.App.4th 511, 533. A program-level EIR must contain "extensive, detailed evaluations" of

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- 2 The DEIR evaluates impacts compared to the existing conditions as required by CEQA. In addition to this analysis, the transportation and other technical sections also evaluate the impacts compared to the existing plan for comparison purposes. This is typical in order to understand how the proposed plan compares to the adopted plan, but does not form the basis for the analysis. As referenced by the commenter, the DEIR uses a 2018 baseline to establish the baseline existing conditions. This baseline represents existing conditions as of 2018 in addition to recently approved projects and pipeline projects (including the WLC). The DEIR baseline was prepared using the City's best estimate of existing and foreseeable development. See Section 3.2.4 of the DEIR for a description of Buildout Projections.
- 3 This comment cites references from the CEQA guidelines and case law. The comment suggests that the EIR needs to include more detail about the impacts of the project but does not indicate specifically what portion of the analysis is of concern. The EIR includes a thorough analysis of buildout of the General Plan for all CEQA subject areas at a level of detail appropriate for a programmatic analysis. Appendix E VMT Impact memo includes an appendix that discloses assumptions associated with truck trips for the existing plan, proposed plan and build-out of both plans. These numbers include anticipated warehouse development in the City.

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a plan's effects on the existing environment. *Environ. Planning & Info. Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 358. Consequently, the DEIR must be revised to include more information about the impacts associated with the buildout of the Planning Area, and it must include information about the assumptions used to reach its conclusions - i.e., the number of truck trips that are expected from past, present and future industrial warehouse development in the City.

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**C. Air Quality Impacts**

In terms of whether the GPU exceeds an applicable air quality threshold of significance - i.e., whether the Project will conflict with an applicable air quality plan - the DEIR claims that impacts are less than significant because it asserts that, "buildout of the 2021 GPU would result in a decrease in emissions when compared to buildout of the existing 2006 General Plan. Therefore, buildout of the project would not exceed the assumptions used to develop the AQMP..." (DEIR p. 4.3-14) The DEIR incredibly claims that the buildout of the GPU would "decrease the amount of commercial and industrial space compared to the existing 2006 General Plan." (DEIR p. 4.3-13) Without more information, this statement cannot be reconciled with the reality that the WLC project, approved August 2015, will alone consist of over 40 million square feet of new warehouse distribution space.

Indeed, since 2006, the City has approved a multitude of industrial warehouse projects within the subject GPU Planning Area. Many of these distribution or "logistics" warehouse projects were approved by way of amendment to the 2006 General Plan. The GPU is not "consistent" with the AQMP, as the latest version of the AQMP is ostensibly reliant upon the land use plan presented in the 2006 GPU which does not account for subsequent general plan amendments which have served to allow more intense uses than envisioned by the 2006 General Plan.

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The DEIR cannot flatly claim that impacts of the GPU Project are less than significant compared to the existing 2006 General Plan without more discussion and explanation. For instance, in the area of NOx emissions, DEIR Table 4.3-4 states that mobile emissions under the Existing 2006 General Plan (2040) are 2,032 lbs/day. Under the GPU, the DEIR asserts that NOx emissions are 1,993 lbs/day. As a result, the DEIR claims that with buildout of the GPU there is actually a *decrease* in NOx emissions (by 39 lbs/day). However, this number of 2,032 lbs/day assumes that growth has remained consistent with the 2006 General Plan, which is not the case. The City's approval of numerous warehouse projects have resulted in greater cumulative NOx emissions than assumed by the 2006 General Plan. And, in almost each case, the EIR for the approved warehousing project, whether or not approved by a general plan amendment, concludes that NOx impacts are significant and unmitigable (see, Exhibit 1 - except of MV Logistics Center EIR). If individual projects will generate significant NOx emissions, it logically follows that, cumulatively, impacts will also be significant. Moreover, it appears that the 2006 General Plan assumed, at maximum, 46,408 square feet of "business park/industrial" development (Exhibit 2 hereto - except of 2006

4 The current Air Quality Management Plan (AQMP) is the Final 2016 AQMP that was adopted on March 3, 2017. The 2017 AQMP relies on emissions inventories and future projections that are based in part on the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2016 RTP/SCS relies on land use plans provided by local jurisdictions at the time that the 2016 RTP/SCS was being prepared, which would include General Plan land use amendments approved since the adoption of the 2006 General Plan. Therefore, the 2017 AQMP is based on future growth projections that take into account these land use amendments.

Further, a 2018 baseline was used in the air quality analysis, not the 2006 General Plan. The 2018 baseline is based on year 2018 population and employment, vehicle miles traveled (VMT), and building energy data provided by local utilities in preparation of the CAP. This baseline also takes into account recently approved and pipeline projects, including the WLC. The SCAG model consistent with the 2016 SCAG RTP/SCS growth projections was used to project future emissions under both the adopted and proposed land use plans, both of which include the WLC project as well as other warehouse projects approved since adoption of the 2006 General Plan. Text has been added to the Air Quality section of the EIR to clarify this.

The comment also points out that NOx emissions associated with the WLC would exceed the significance thresholds. A program-level comparison of the emissions that would occur under buildout of the adopted land use plan and buildout of the proposed land use plan was done in order to determine if the 2021 GPU would conflict with implementation of the AQMP. At the project-level, the City's process for evaluation of future development that could be implemented under the 2021 GPU would include environmental review and documentation pursuant to CEQA, as

City of Moreno Valley - MoVal 2040 General Plan Update  
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General Plan), while the City has approved more than 50 million square feet of such development since 2006 (see, project list below). Again the 2006 General Plan is not an appropriate baseline for analysis of impacts.

The conclusions of DEIR Table 4.3-4 are dubious at best as it is implausible that air quality impacts are less than significant under buildout of the Planning Area inclusive of all built and reasonably foreseeable planned development since the 2006 General Plan. (See p. 4.30-14, Table 4.304) At full buildout, the WLC will generate NOx emissions of 3,064 lbs/day, vastly exceeding the SCAQMD threshold of 55 lbs/day. (Exhibit 3 – except of WLC DEIR). The DEIR is inherently inconsistent where the document actually states that: “Pollutant emissions from buildout of all land uses within the Planning Area would far exceed project-level SCAQMD Significance Thresholds.” This is a finding of significance and all feasible mitigation must be adopted. The DEIR’s conclusions under sections 4.3.6.2 (b), 4.3.6.3 and 4.3.7.2 (b) are not based on substantial evidence. The DEIR must make a finding of significance, and, in accordance with CEQA, adopt all feasible mitigation for significant air quality impacts.

The DEIR describes that the City will increase industrial square footage by 45,935,324 square feet under the buildout scenario. In a glaring omission, the DEIR does not disclose the number of diesel truck trips inclusive of all projects approved pursuant to general plan amendments since 2006, including the additional 45,935,324 square feet of industrial warehouse space that will be added to the Planning Area, plus the additional trips associated with reasonably foreseeable future industrial warehousing located in, for instance, the new “Business Flex” land use designation that would allow these uses<sup>1</sup>. The City has not made a good faith effort at CEQA compliance where, on the one hand, the DEIR acknowledges that emissions would “far exceed project-level” thresholds of significance but the City fails to calculate and disclose the impacts with any specificity; nor does the DEIR propose even one mitigation measure for the impact. Moreover, the conclusion that the GPU project has less than significant impacts, despite exceeding air quality standards, because of alleged conformance with the AQMP is based on a specious premise – i.e., that growth has remained constant and consistent with the AQMP, which it has not as discussed above.

It must be remembered that the WLC will develop one of the largest industrial warehouse campuses in the country with square footage equal to more than 700 football fields. It will generate approximately 71,085 daily vehicle truck trips. (Exhibit 4 hereto – except of WLC DEIR). Since 2009, Moreno Valley has approved at least the following industrial warehouse projects that serve as “distribution” centers for consumer goods: these

<sup>1</sup> The City of Moreno Valley is actively working to grow industrial warehouse/logistics development; the City has a dedicated entity in order to attract these projects. <https://www.morenovalleybusiness.com/industrialbusinesscouncil/> and, <https://4f9d4r2sugfrhh6in4es6d0a-wpengine.netdna-ssl.com/wp-content/uploads/2017/05/Industrial-Logistic-Developer-Business-Council-2017-1.pdf>

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well as an analysis of those site-specific projects for consistency with the goals, policies, and recommendations of the 2021 GPU. Additional measures that can be implemented at the project level have been added to the FEIR in order to facilitate future site design at warehouse and distribution center sites to reduce impacts.

5 The SCAQMD significance thresholds are project-level thresholds. Project-level standards are not appropriate for a program-level analysis, as the thresholds are conservative and intended to ensure many individual projects would not obstruct the timely attainment of the national and state ambient air quality standards. Generally, discretionary, program-level planning activities, such as general plans, community plans, specific plans, etc., are evaluated for consistency with the local air quality plan. In contrast, project-level thresholds are applied to individual project-specific approvals, such as a proposed development project. At the program level, the analysis compares emissions generated by project buildout to emissions generated under buildout of the adopted land use plan to determine if the emissions would exceed the emissions estimates included in the AQMP, and to determine whether it would obstruct attainment. The air quality analysis does come to a conclusion and finds that with implementation of future site-specific air quality analysis for individual projects and application of General Plan and CAP policies, a cumulatively considerable net increase in operational criteria pollutants would not occur and the project would not obstruct attainment of applicable federal or state ambient air quality standards. Detailed model results are included in Appendix B of the EIR.

6 The comment states that the DEIR does not disclose the number of diesel truck trips inclusive of all projects approved pursuant to general plan amendments since 2006. As discussed in response to comment 4, the analysis is based on year 2018 baseline VMT along with 2016 SCAG RTP/SCS growth projections which take into account land use amendments and projects approved since adoption of the 2006 General Plan, and pipeline projects. The traffic modeling conducted for the baseline year and for the buildout year included medium truck and heavy truck percentages specific to each roadway segment included in



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	<p>6 cont.</p> <p>the VMT analysis. Although the air quality section does not indicate the number of diesel trips, the emission calculations and VMT presented in the analysis take into account all existing and future diesel truck trips. Refer to response to comment 5 regarding the program-level of analysis.</p> <p>The comment also provides a list of 13 industrial projects that are approved or are in the process of being reviewed. As discussed, the analysis takes into account land use amendments that were approved since adopted of the 2006 General Plan. Additionally, in developing the 2021 GPU land use map, the City took into account approved and pipeline projects to date, including all of the projects listed in the comment. The analysis uses the appropriate baseline based on the best available information at the time of preparation. The comment incorrectly states that the analysis did not consider cumulative development.</p> <p>Further, the analysis provided is conservative as it does not take into account the recent WLC EIR settlement which includes legally binding requirements to implement a number of additional mitigation measures that would minimize air quality impacts. Measures that would be implemented at WLC would result in lower Citywide air emissions include but are not limited to:</p> <ul style="list-style-type: none"><li>• Provide up to 1,000 eBike subsidies in the amount of \$500 to WLC employees who commit to bike to work at least twice per week on average. The subsidies will be phased proportionately with buildout of the first 15 million square feet of the project.</li><li>• Develop and implement program to ensure knowledge of trip reduction measures by project employees.</li><li>• Provide 40% subsidies for bus passes for tenants' employees who commit to bus to work at least twice per week on average.</li><li>• Require tenants to have trip reduction plans to achieve 1.3 average vehicle ridership as a factor of total number of employees (in tenant leases).</li><li>• Require tenants to have a Transportation Management Association to encourage carpooling (in tenant leases).</li></ul>
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	<p>6 cont.</p> <ul style="list-style-type: none"><li>• Provide bike lockers for 5% or more of building users within 50 yards of employee building entrances.</li><li>• Fund a zero emission shuttle that circulates within the Specific Plan area and has pickup and drop-offs at the closest off-site bus stop no later than the issuance of a certificate of occupancy for 15 million square feet of warehouse buildings.</li><li>• WLC will provide 1,000 Level 1 chargers in WLC parking lots, phased proportionately with project buildout, and will ensure that they function properly for at least 15 years from their dates of installation.</li><li>• WLC will provide 80 Level 2 chargers in WLC parking lots with two ports per charger (for a total of at least 160 ports), phased proportionately with project buildout, and will ensure that they function properly for at least 15 years from their dates of installation.</li><li>• WLC will install signage at each EV parking space stating that the parking space is for EVs only and improperly parked vehicles will be towed.</li><li>• WLC must construct all warehouse buildings to achieve at least <b>LEED Silver Certification</b> for core and shell. If the WLC seeks to advertise a building as having LEED Silver Certification, it shall apply for certification. If certification is granted, notice shall be provided to Petitioners.</li><li>• Warehouse roof areas not covered by solar panels shall be constructed with materials with an initial installation <b>Solar Reflective Index Value of not less than 39.</b></li></ul> <p>As none of these measures were assumed in the EIR analysis, and the WLC represents a large portion of Citywide emissions, the EIR provides a conservative analysis.</p>
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projects are appropriately considered part of the southern-California "goods movement" network<sup>2</sup>, thus they are truck intensive uses:

- March Business Center (2009) - **1,484,407** square feet of industrial warehouse space on 66.9-acres with GPA
- Master Plot Plan PA07-0035 (2010) - **409,598** square foot industrial warehouse
- West Ridge Commerce Center (2011) - **937,260** square foot warehouse distribution building
- VIP Moreno Valley Project (2012) - **1,616,133** square foot warehouse space
- First Inland Logistics Center II Project (2013) - **400,130** square feet warehouse space
- First Nandina Logistics Center Project (2014) - **1,450,000** square feet warehouse space
- Prologis Eucalyptus Industrial Park Project (2015) - **2,244,419** square feet of warehouse uses including GPA changing land use designations from residential to Light Industrial
- World Logistics Center (2015) - **40.6 million** square feet of warehouse logistics development on 3,918 acres in eastern Moreno Valley
- Indian Street Commerce Center Project (2016) - **446,350** square feet of warehouse space
- Moreno Valley Logistics Center (2016) - **1,736,180** total square feet of warehouse space
- Brodiaea Commerce Center (2017) - **262,398** square foot warehouse including a rezone from Business Park-Mixed Use to "Light Industrial"
- Moreno Valley Business Park (2021) - **220,390** square feet of warehouse logistics development including a GPA to change land use designation from commercial to "Light Industrial."
- Moreno Valley Trade Center \*under review; proposal for an industrial warehouse comprising 1,332,380 square feet to include a GPA from residential to "Light Industrial".

Each of these projects must be included in the analysis of the GPU's environmental impacts as they are cumulative projects, and the GPU project is, by its nature, a programmatic document that evaluates the broad environmental effects anticipated from the buildout of the Planning Area. The DEIR cannot examine isolated components of the buildout, particularly as the programmatic EIR will be relied upon by future project-specific EIRs. Currently the DEIR proposes not a single air quality mitigation measure based on the erroneous conclusion that the buildout of a Planning Area with more than 45 million square feet of industrial space, more than 10% of the Planning Area, will have less than significant air quality impacts.

<sup>2</sup> <http://www.moval.org/edd/documents/about-projects.html>

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The DEIR defers analysis of impacts where it asserts that future projects will reduce their respective impacts based on implementation of the “goals, policies, and recommendations of the 2021 GPU.” But the GPU DEIR lacks analysis of air quality impacts of the buildout of the Planning Area, and it contains nothing enforceable by way of mandatory mitigation measures. To the extent that these future projects are able to merely demonstrate “conformance” with the GPU, they may avoid mitigation of impacts altogether. The GPU DEIR is effectively structured to allow avoidance of CEQA mitigation for future implementing projects. This is not the intent of CEQA even with respect to “programmatic” documents.

An EIR’s central purpose is to identify a project’s significant environmental effects and then evaluate ways of avoiding or minimizing them. Pub. Res. Code §§ 21002.1(a), 21061. The lead agency must also adopt *any* feasible mitigation measure that can substantially lessen the project’s significant environmental impacts. Pub. Res. C. § 21002; Guidelines, § 15002(a)(3). This is most essential when the project is a program EIR. The program EIR “[a]llows the lead agency to consider broad policy alternatives and program wide mitigation measures at any early time when the agency has greater flexibility to deal with basic problems or cumulative impacts.” Guidelines, § 15168 (b)(4) (emphasis added).

In accordance with CEQA, the City must impose enforceable mitigation measures particularly measures to address tail pipe emissions insofar as the majority of the Project’s significant air quality emissions are attributable to mobile sources. It is estimated that NO<sub>x</sub> emissions will need to be reduced by approximately two-thirds by 2023 and three-quarters by 2030 to meet applicable emission reduction targets.<sup>34</sup> According to the SCAQMD’s Blueprint for Clean Air (2016), the southern California air basin will require approximately a 65 percent reduction in NO<sub>x</sub> emissions, *above and beyond existing measures*, to meet air quality standards.<sup>5</sup> Hence the City must require the Project to utilize the cleanest available truck technologies. The Project should establish fleet efficiency requirements for vehicle fleets particularly for any future industrial projects. This should include, at a minimum, requirements that industrial tenants shall use exclusively zero emission light and medium-duty delivery trucks and vans; shall use only zero emission service equipment such as forklifts and yard trucks; and shall use near-zero and zero-emission technologies in heavy-duty applications such as “last mile delivery.” As the State moves toward its goal of zero emission goods movement, the City must ensure that the Project is in line with this important objective by also requiring the phase-in of zero emission or clean technology for heavy duty trucks. According to CARB, actions to deploy both zero emission and cleaner combustion technologies will be essential to meet air quality goals in California particularly with respect

<sup>3</sup> <http://rtmseq.scag.ca.gov/Documents/2012/final%2012RTPSCS.pdf>

<sup>4</sup> <https://www.aqmd.gov/docs/default-source/Agendas/agmp/white-paper-working-groups/wp-blueprint-draftfinal.pdf?sfvrsn=4>

<sup>5</sup> <https://www.aqmd.gov/docs/default-source/Agendas/agmp/white-paper-working-groups/wp-blueprint-draftfinal.pdf?sfvrsn=4>

## RESPONSE

7 The City’s process for evaluation of future development that would be implemented would include environmental review pursuant to CEQA. This includes an analysis of consistency with the goals, policies, and recommendations of the 2021 GPU, as well as the evaluation of future development projects air quality impacts using SCAQMD guidelines, regional emissions thresholds, and localized significance thresholds (LSTs). Projects that would exceed the SCAQMD significance thresholds would be required to implement project-level reduction measures to reduce potential impacts. Additional measures that can be implemented at the project level have been added to the FEIR in order to facilitate future site design at warehouse and distribution center sites to reduce impacts.

It is not possible to identify specific mitigation measures for future projects at a program level of analysis as site specific analysis and project details are not available at this time. However, as each future project would be reviewed during a subsequent CEQA review using SCAQMD guidelines, regional emissions thresholds, and localized significance thresholds (LSTs), all feasible project specific mitigation measures would be applied at that time. Additionally, applicable General Plan and CAP policies would apply during subsequent environmental review.

The comment suggests that the EIR include a requirement that tenants shall be required to use zero emission vehicles. State requirements for phasing in of low and zero emission trucks and vehicles would be implemented within the City regardless of a specific mitigation measure or policy. Additionally, as detailed in the prior response, the WLC will be required to incorporate measures that will result in electrification of vehicles and equipment. As one of the largest contributors of air emissions in the city, the requirements of the WLC will significantly reduce air emissions beyond the assumptions in the EIR. Other projects within the City will phase in the State’s clean truck technology in accordance with mandated timelines. Regarding consistency with RTP goals for zero and near-zero emissions transportation technologies, each future project proposed consistent with the General Plan will undergo a site-specific environmental review that will include evaluation of consistency with Regional Plans including any SCAG policies.

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to goods movement<sup>6</sup>. The Project must be fully consistent with SCAG’s 2012-2035 Regional Transportation Plan (“RTP”) including the RTP’s “regional commitment for the broad deployment of zero- and near-zero emission transportation technologies in the 2023-2035 time frame and clear steps to move toward this objective.”<sup>7 8 9</sup> The RTP states,

it is estimated that NOx emissions will need to be reduced by approximately two-thirds in 2023 and three-quarters in 2030. This is a daunting challenge. The level of emission reduction required is so significant that 2030 emissions forecasted from just three sources—ships, trains, and aircraft—would lead to ozone levels near the federal standard. Because most sources, including cars and factories, are already controlled by over 90 percent, attainment of ozone standards will require broad deployment of zero- and near-zero emission technologies in the 2023–2035 time frame. *See, id.*

Additional, feasible mitigation for operational air quality impacts includes the phase-in of electric, hybrid electric, hydrogen electric, or battery operated (*i.e.*, non-diesel) trucks. The GPU should be conditioned to adopt a “Diesel Minimization Plan” whereby zero emission trucks are phased in for all applicable projects, *e.g.*, 10% of truck fleets shall use zero emission technology by 2030, and increase that percentage by 10% per year, until 100% of trucks operating on sites are zero emission. Non-diesel trucks are expected to be deployed in the commercial market and are therefore feasible within the life of the Project.<sup>10</sup> <sup>11 12</sup> For instance, Volvo Trucks demonstrated Class 8 battery-electric trucks in February 2020. *See, id.* The Ports of Long Beach and Los Angeles have a firm goal of transitioning to zero emission technology.<sup>13</sup> *See also*, article describing AQMD studying and working with manufacturers to develop zero emission Class 8 trucks<sup>14</sup>; article describing CARB using cap and trade funds to work with manufacturers to “accelerate the market for next generation of clean, heavy-duty trucks and buses, both those that run on electricity and on hydrogen”<sup>15</sup>. In short, zero emission vehicles (ZVE’s) are a priority in California.<sup>16</sup>

A mitigation measure is feasible if it can be achieved in a reasonable period of time. Guidelines, § 15364. The GPU Project should, at a minimum, require implementing projects

<sup>6</sup> <https://ww3.arb.ca.gov/planning/sip/2016sip/2016mobsrc.pdf>  
<sup>7</sup> [http://rtpscs.scag.ca.gov/Documents/2012/final/2012RTP\\_ExecSummary.pdf](http://rtpscs.scag.ca.gov/Documents/2012/final/2012RTP_ExecSummary.pdf)  
<sup>8</sup> [http://rtpscs.scag.ca.gov/Documents/2012/final/SR\\_2012RTP\\_VehicleTechnology.pdf](http://rtpscs.scag.ca.gov/Documents/2012/final/SR_2012RTP_VehicleTechnology.pdf)  
<sup>9</sup> <http://rtpscs.scag.ca.gov/Documents/2012/final/T2012RTPSCS.pdf>  
<sup>10</sup> <https://www.greenbiz.com/article/8-electric-truck-and-van-companies-watch-2020>  
<sup>11</sup> <https://www.truckinginfo.com/341895/volvo-to-start-selling-electric-class-8-truck-here-at-end-of-2020>  
<sup>12</sup> <https://arstechnica.com/cars/2020/02/charging-into-the-mainstream-volvo-electrifies-its-first-class-8-truck/>  
<sup>13</sup> <https://kentico.portoflosangeles.org/getmedia/a2820d01-54f6-4f38-a3e5-81c228288b87/2017-final-caap-update>  
<sup>14</sup> <http://www.aqmd.gov/home/library/public-information/2016-news-archives/dragage-trucks>  
<sup>15</sup> <https://www.arb.ca.gov/newsrel/newsrelease.php?id=915>  
<sup>16</sup> [http://www.energy.ca.gov/renewables/tracking\\_progress/documents/electric\\_vehicle.pdf](http://www.energy.ca.gov/renewables/tracking_progress/documents/electric_vehicle.pdf)

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8 The comment incorrectly states that the Draft EIR concludes air quality impacts are significant. For clarity, the Draft EIR concludes that construction emissions associated with the project would be significant and identifies feasible mitigation measures to minimize adverse impacts. For operational air quality impacts, the Draft EIR concludes that impacts would be less than significant. The requirement to phase in lor or zero emission technologies is already being mandated at the State level and would be implemented in the City in accordance with State timelines.

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to reevaluate, at periodic intervals, whether some portion of the fleet serving must be zero emission or battery powered. The Governor’s 2016 ZEV Action Plan (October 2016) identifies as a priority “Making ZEV technologies commercially viable in targeted applications the medium-duty, heavy-duty, and freight sectors”. *Id.* Therefore, it is feasible, practical, and necessary to require the use of alternatively fueled trucks presently or at some reasonable time in the future. As goods movement is a major source of emissions that contribute to regional NOx emission levels, steps must be taken to address NOx emissions apart from compliance with existing and future regulations related to diesel engine technology.<sup>17</sup> Again the DEIR tacitly admits that air quality impacts are significant.

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The Project should also incorporate the policies and goals of the State’s Zero Emission Vehicle (ZEV) Action Plan and Executive Order B-48-18 (calling for a target of 5 million ZEVs in California by 2030) where these plans and rules call for increasing the availability of electric vehicle charging stations and other zero-emission vehicle infrastructure including *direct current fast chargers*.<sup>18</sup> EV charging infrastructure is a critical mechanism to help California reach its climate and EV adoption goals by providing opportunities at homes and workplaces as well as overcoming the critical challenge of “range anxiety” associated with EV purchase by consumers.<sup>19</sup> As such, the Project should include requirements of *installation* of electric vehicle supply equipment (EVSE) *charging stations* at public and private facilities. Additional air quality mitigation may include requirements for funding for installation of air filtration units in homes impacted by implementing projects.

9

**D. Greenhouse Gas Emissions**

The WLC alone will generate 751,787 MTCO<sub>2e</sub>/year (Exhibit 5- excerpt of WLC DEIR). It is inconceivable that the GPU project—that is, the buildout of the Planning Area—will not generate GHG emissions above significant thresholds. The analysis of the GHG emissions is, by its nature, an evaluation of a project’s cumulative contribution to GHG impacts. The GPU project cannot, therefore, be viewed in isolation in terms of any alleged “limited” land use changes presented by the GPU; that is, the totality of the buildout of the General Plan, as the GPU will replace the existing General Plan, must be fully disclosed, evaluated, and mitigated pursuant to CEQA. The conclusion of less than significant is unsupported. Moreover, the reader cannot discern the assumptions used to conclude that GHG impacts will be less than significant, such as the number of vehicle trips, including heavy duty diesel truck trips, that were used to calculate mobile emissions. As mobile emissions are the largest contributor to GHG emissions, the data underlying the conclusions must be fully disclosed.

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<sup>17</sup> [http://rtpes.scag.ca.gov/Documents/2012/final/SR/2012RTP\\_GoodsMovement.pdf](http://rtpes.scag.ca.gov/Documents/2012/final/SR/2012RTP_GoodsMovement.pdf)  
<sup>18</sup> <https://business.ca.gov/industries/zero-emission-vehicles/zev-action-plan/>  
<https://www.ca.gov/archive/gov/39/2018/01/26/governor-brown-takes-action-to-increase-zero-emission-vehicles-fund-new-climate-investments/index.html>  
<sup>19</sup> <https://calate.com/wp-content/uploads/2019/10/CAI.Green-2019-Supplement-Cost-Analysis-Final-1.pdf>

9 The CAP incorporates measures that would support emission reductions including transportation measures T-1 through T-10 that would be implemented in order to meet the City’s GHG reduction goals consistent with statewide standards. These measures include implementing Transportation Demand Management strategies and programs identified in Connect SoCal, increasing the use of public transportation and alternative modes of travel, implementing trip reduction programs, and installing electric vehicle stations and other alternative fuel vehicle support infrastructure. The CAP is a Qualified GHG Reduction Strategy, and future development project would be required to demonstrate compliance with the CAP measures. While these measures were designed to reduce GHG emissions, they would also serve to reduce emissions of criteria pollutants including NO<sub>x</sub>.

10 Assumptions of mobile emissions consider buildout of the project as a whole, including build out of the General Plan, recently approved projects, and pipeline projects. The assumptions associated with vehicle usage for build out of the project is contained as an appendix to the VMT Impact Memo, which can be found as Appendix E of the Draft EIR. GHG emission reductions were calculated based on accepted guidance documents including CAPCOA and other sources. Additionally, the analysis is conservative as it did not include any of the recently mandated measures that will be implemented at WLC as a result of a settlement agreement.

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One of the most glaring failures of the DEIR is the lack of enforceable mitigation with respect to reducing GHG emissions. It has been repeatedly stated that actions by local governments are key to addressing the problem of global climate change.

The DEIR and CAP do not demonstrate that GHG emissions are mitigated to a level of less than significant as claimed, as many of the general plan "policies" are not enforceable. CEQA requires that mitigation measures must be "fully enforceable through permit conditions, agreements or other measures" so "that feasible mitigation measures will actually be implemented as a condition of development." *Federation of Hillside & Canyon Ass'ns v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261. In addition, CEQA prohibits the deferred formulation of mitigation measures. Guidelines § 15126.4 (a)(1)(B). The policy measures that are relied upon to purportedly reduce GHG emissions to levels of less than significant are, in most cases, permissive rather than mandatory, meaning they are not enforceable, and many are impermissibly deferred. As a purported qualified greenhouse gas reduction plan, the proposed GPU must meet the requirements for all first-tier documents and impose enforceable requirements with defined performance standards. Because future discretionary projects will rely on the GPU, and any "group of measures, including performance standards" to achieve the specified reductions and forgo further CEQA GHG emission analysis, the GPU's reduction measures must be considered mitigation measures for purposes of CEQA and must therefore comply with CEQA requirements. The DEIR states "[i]f the proposed CAP is adopted, projects that demonstrate consistency with the 2021 GPU and CAP would be subject to a streamlined CEQA review process for mitigation of GHG emissions, pursuant to CEQA Guidelines Section 15183.5. (DEIR p. 3-22).

The DEIR states, "the City would need to reduce emissions by 316,385 MTCO<sub>2</sub>E in order to achieve the 2040 emissions target and be consistent with the 2017 Scoping Plan and Statewide goals." (DEIR p. 4.8-15). The EIR asserts that the proposed CAP's "strategies" would reduce GHG emissions below the standards established in CARB's 2017 Scoping Plan and would reduce impacts below levels of significance. However, to the extent that many of the measures within DEIR Table 4.8-6 are permissive and illusory, the "mitigation program" is ineffective within the meaning of CEQA. The DEIR must be updated to include enforceable GHG emission reduction strategies that are verifiable in terms of ensuring that the asserted reductions in GHG emissions will be achieved in any real sense.

For instance, proposed measure TR-3 states that the City will "encourage" businesses to implement Transportation Demand Management Strategies, and the DEIR claims a reduction of 50,932 MTCO<sub>2</sub>E per year based on purported implementation of this measure. TR-4 states the City will create a Transportation Demand Management Program for City staff to "promote" alternative modes of transportation "to the greatest extent possible." TR-6 states the City will "advocate" for improvements to transit service. I-1 states the City will "actively promote" the use of "energy-efficient building operation systems" with the "goal" of achieving a 40% energy reduction in 30 percent of industrial square footage, and the DEIR

- 11 11 The CAP was prepared as a qualified CAP wherein emissions were calculated based on well documented and accepted guidance for emissions calculations such as CAPCOA and other sources. Emission reduction estimates based on various measures are conservative and account for the low end of emissions reductions in order to provide a conservative analysis. In order for future development to find GHG impacts would be less than significant, future projects would have to demonstrate consistency with the CAP and applicable policies. Appendix C-1 includes Potential Project Level GHG Reduction Measures. As stated in Appendix C-1, implementation of the listed measures are not essential for the City to meet its GHG reduction targets.
- 12 12 The comment references CAP measure TR-3 and other CAP measures and raises concern that the policies do not mandate but only encourage specific actions. The policies are intentionally flexible to allow for appropriate project level implementation. Accordingly, the GHG reductions assumptions used for each measure are appropriately conservative. Appendix B of the CAP provides Table B-1 which identifies the estimated GHG reductions associated with each measure. For TR-1, for example, the City's goal for this measure is to achieve a 10 percent increase in alternative mode use. This conservative assumption accounts for the fact that the policy is not a mandate for every project. The comment also references policy I-1 and questions the emission reduction estimates. Like the example above, the emission reductions are based on accepted guidance (e.g. CAPCOA) and are conservative. Further, the recent mandates for additionally energy efficiency at the WLC resulting from the court settlement, will likely alone achieve the GHG reduction goals in I-1, as these were not anticipated in the analysis.

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claims a reduction of 38,416 MTCO<sub>2</sub>E based on the alleged implementation of this measure. These and other measures in Table 4.8-6 are unenforceable, vague, and illusory because they do not require the implementation of the measure. Moreover, many of the measures could be read as requiring nothing more than conformance with existing regulations, such as compliance with the “energy efficiency” requirements of CalGreen/Title 24. For instance, there is no requirement that new development shall utilize renewable energy sources for some portion of its energy demand, such as solar power energy for new warehouse projects. Achieving “energy efficiency” is not an enforceable standard, and it could mean that projects simply employ the minimum Code requirements. In short, the City has failed to propose enforceable mitigation for significant GHG impacts.

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The State of California has committed to aggressive goals for the reduction of the emissions causing global climate change. Executive Order S-3-05 establishes a 2030 target of a 40 percent GHG reduction below 1990 levels; Executive Order S-3-05 establishes a GHG emission reduction target of 80% below 1990 levels by 2050; and Executive Order B-16-2012 establishes a target for the reduction of GHG emissions from the transportation sector of 80% below 1990 levels by 2050. Given the State’s commitments for reductions of GHG emissions, the City is obligated to identify and adopt all feasible mitigation measures to mitigate significant GHG impacts. Guidelines, § 15126.4.

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There are numerous mitigation measures available to reduce GHG emissions. For instance, the City should consider measures from the California Air Pollution Control Officers Association’s (“CAPCOA”) *CEQA & Climate Change* (January 2008) document,<sup>20</sup> including those in Table 16: MM T-2, MM T-14, MM T-19, MM D-15, MM E-5, MM E-6, MM E-8, MM E-10, MM E-11, MM E-12, MM E-13, MM E-14, and MM E-15. The transportation sector is the largest source of GHG emissions, accounting for roughly 29 percent of GHG emissions in the United States in 2019<sup>21</sup> and over 40 percent of California’s CO<sub>2</sub> emissions (the largest component of GHGs)<sup>22</sup>. The DEIR confirms that transportation is the largest source of GHG emissions (see, Table 4.8-5). The Project must incorporate enforceable transportation measures to reduce fuel use in cars and trucks including reducing vehicle miles traveled (“VMT”). Some example of measures aimed at reducing VMT include: providing carpool incentives to employees, such as free parking, preferred parking or implementing a reward program for carpooling<sup>23</sup>; providing free, low-cost monthly transit passes to employees<sup>24</sup>; creating an online ridesharing program that matches potential

<sup>20</sup> <http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf>

<sup>21</sup> <https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions#:~:text=The%20primary%20sources%20of%20greenhouse,share%20of%20greenhouse%20gas%20emissions.>

<sup>22</sup> <https://www2.arb.ca.gov/ghg-descriptions-sources#:~:text=Transportation%20is%20the%20single%20largest,CO2%20emissions%20in%20California.>

<sup>23</sup> <http://www.cleamairpartnerstx.org/resources/Carpool%20Incentive%20Programs%20-%20EPA.pdf>

<sup>24</sup> [http://rtpscs.scag.ca.gov/Documents/peir/2012/final/20120120PEIR\\_AppendixG\\_ExampleMeasures.pdf](http://rtpscs.scag.ca.gov/Documents/peir/2012/final/20120120PEIR_AppendixG_ExampleMeasures.pdf)

13 Comment noted. The EIR appropriately concludes that implementation of the project would result in less than significant GHG emissions. Implementation of the CAP was found to achieve the required emission reductions to meet State GHG reduction goals. The comment does not identify a specific concern regarding the adequacy of the analysis.



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carpoolers through e-mail; development of a commuter trip reduction plan<sup>25</sup>; transit stops<sup>26</sup>; and promoting accessibility to public transit such as providing a shuttle service to transit service for employees. These types of measures that promote ride sharing and the use of public transportation are feasible mitigation for significant GHG impacts. Furthermore, a measure should be imposed requiring that projects provide the necessary facilities and infrastructure (i.e., EV charging units) to encourage the use of low or zero-emission vehicles.

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**E. Energy Impacts**

The DEIR’s analysis and mitigation of the Project’s energy impacts is inadequate.

14

First, the DEIR does not evaluate the buildout of the Planning Area with any detail that allows the reader to understand the scope of impacts. Instead, it asserts that impacts “would need to be addressed in detail at the time specific projects are proposed.” (DEIR p. 4.6-7) This type of deferral is not permitted under CEQA.

Second, the DEIR’s conclusions with respect to energy resources are not supported. The DEIR asserts that the Project would result in less VMT and less building energy consumption “compared to buildout of the existing 2006 General Plan.” Again the DEIR fails to account for the growth since 2006 that was not anticipated under the 2006 General Plan including the WLC project. It is inconceivable that buildout of the GPU inclusive of more than 50 million square feet of industrial warehouse space will result in a reduction of VMT as well as electricity and natural gas usage compared to the buildout scenario of the 2006 General Plan. (DEIR p. 4.6-9)

Third, the DEIR tacitly acknowledges that the GPU will result in significant impacts, and mitigation is therefore required, where it states that: VMT will be greater with buildout of the Planning Area in that the Planning Area generates 3,144,986 VMT in the existing condition and buildout of the project would generate 4,524,038 VMT; and that existing industrial electricity usage is 99,77,374 kWh and the GPU project will require 754,522,614 kWh (DEIR Table 4.6-2). While the DEIR does not disclose the building area assumptions comprising the “Proposed 2021 GPU (2040)” scenario, this represents a vast increase in building energy demand, constituting a significant impact.

15

State CEQA Guidelines Appendix F provides that “[t]he goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include: (1) decreasing overall per capita energy consumption; (2) *decreasing* reliance on fossil fuels such as coal, natural gas and oil, and (3) *increasing* reliance on renewable energy sources.” (emphasis added) Appendix F puts “particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.” The EIR’s finding of less-than-significant with respect to energy resources is not supported insofar as the City has taken no steps towards

<sup>25</sup> <https://opr.ca.gov/docs/june08-ceqa.pdf>

<sup>26</sup> [http://rtps.scag.ca.gov/Documents/peir/2012/final/2012PEIR\\_AppendixG\\_ExampleMeasures.pdf](http://rtps.scag.ca.gov/Documents/peir/2012/final/2012PEIR_AppendixG_ExampleMeasures.pdf)

14 While page 4.6-7 states “impacts would need to be addressed in detail at the time specific projects are proposed”, a program-level of analysis is also provided. The analysis identifies the total energy consumption that would be associated with buildout of the 2021 GPU. Specifically, the existing and future VMT are disclosed in Section 4.6.5.1(b), and the total existing and future electricity and natural gas consumption is provided in Table 4.6-2. Analysis is not deferred.

15 A future increase in VMT and energy consumption over the existing baseline condition does not inherently imply that the project would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Further, through implementation of the energy-related GHG reduction measures included in the CAP as well as increasingly energy-efficient building code (Title 24 and CalGreen) requirements, future construction would be more energy efficient than existing buildings. Additionally, the building area assumptions are disclosed in Table 3-4 of the EIR.

The comment states that “the City has taken no steps towards energy efficiency beyond the claim that future projects will comply with regulations then in effect such as CalGreen/Title 24.” The CAP contains numerous GHG reduction measures that focus on energy conservation. The CAP is a Qualified GHG Reduction Strategy, and future development project would be required to demonstrate compliance with the CAP measures.

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energy efficiency beyond the claim that future projects will comply with regulations then in effect such as CalGreen/Title 24. Conformance with regulations and statutes such as Title 24 (CalGreen) is not sufficient to reduce impacts to a level of less than significant.

The City can - and must - do more. For instance, the current version of CalGreen/Title 24 requires solar photovoltaic (PV) panels for new homes but not commercial uses. The City must impose measures on the Project to ensure compliance with Guidelines, Appendix F and to advance the policies and goals of Senate Bill 100 which commits to 100% clean energy in California by 2045. Requiring future implementing projects to utilize solar energy for all, or some portion, of applicable future projects is one feasible means to ensure that the State can meet its energy efficiency goals. Additionally, energy efficiency measures are a feasible means to reduce the Project's significant GHG emissions. Electricity generation accounts for approximately 30% of California's GHG emissions.<sup>27</sup> Another potentially feasible mitigation measure is requiring "LEED" certification as a means to address sustainability.

**F. Transportation Impacts**

The DEIR concludes that the GPU project generates lesser impacts compared to the 2006 General Plan. Again the 2006 General Plan does not provide an accurate baseline to the extent that it does not include the millions of square feet of industrial warehouse space approved or in process of approval since 2006. Also, the discussion of VMT (DEIR Section 4.16.5.2) fails to properly disclose VMT associated with truck trips; it is unclear the number of truck trips used to calculate the GPU VMT. It is unclear whether "Industrial Employment" under Table 4.16-4 includes truck trips or whether this is merely employee vehicle trips. In addition, the discussion of VMT appears inconsistent with the SCAG Growth Projections for Moreno Valley (Table 4.14-1) which shows a population increase in 48,303 or a 23.2% population increase over a 22-year period (p.4-14.2). It is difficult to reconcile this population growth with the conclusion that VMT will be less under the GPU particularly when the City expects 10% of the Planning Area to be developed or occupied by industrial warehouse development.

Furthermore, the DEIR asserts the Project has incorporated VMT reducing "goals and policies to the extent feasible." (DEIR p. 4.16-34) This is insufficient. The City must adopt enforceable measures to ensure that the impacts of the GPU are fully mitigated.

**G. Cumulative Impacts**

An EIR must discuss significant cumulative impacts. Guidelines, § 15130 (a). Cumulative impacts are defined as two or more individual effects which, when considered together, increase environmental impacts. Guidelines, § 15355 (a). A legally adequate cumulative impact analysis views a particular project over time in conjunction with other related past, present, and reasonably foreseeable future projects. Guidelines, § 15355 (b).

<sup>27</sup> <http://ripscs.scag.ca.gov/Documents/2012/Final/F2012RTPSCS.pdf>

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16 Refer to response to comment 2 and 4 above for discussion of the appropriate baseline in the EIR. Appendix E VMT Impact memo includes an appendix that discloses assumptions associated with truck trips for the existing plan, proposed plan and build-out of both plans. These numbers include both employee and truck trips from anticipated warehouse development in the City. The SCAG growth projections are the basis for buildout assumptions; however, ultimate growth projections used in the analysis were refined as detailed in Section 3.2.4 of the EIR. The EIR analysis is not inconsistent with SCAG growth projections, rather the analysis refines the projections for Moreno Valley based on more specific information not incorporated into regional projections.

17 CEQA requires lead agencies to incorporate mitigation to the extent feasible. As detailed in Section 4.16.7.2 Topic 2: Vehicle Miles Traveled, compared to the existing 2006 General Plan, implementation of the project would result in lower VMT using several metrics, demonstrating a land use plan that would increase per capita VMT efficiency. However, some metrics showed an increase in VMT based on several metrics (shown in bold in Table 4.16-5).” Although the proposed plan would reduce VMT compared to the adopted plan, VMT would exceed some thresholds resulting in a significant impact. The project includes a number of TDM goals, policies, and actions that would support VMT reductions; however, anticipated VMT reductions associated with proposed TDM measures would not be large enough to reduce VMT to below all significance thresholds. As the plan itself has reduced VMT compared to the existing plan and policies and TDM goals, policies, and actions have been included to support VMT reductions, adequate and feasible measures have been implemented.

18 The EIR analysis appropriately provides an analysis of cumulative impacts. The bulk of the analysis is cumulative as it anticipates build out of the proposed plan, recently approved projects, and pipeline projects.

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An EIR's central purpose is to identify a project's significant environmental effects and then evaluate ways of avoiding or minimizing them. Pub. Res. Code, § 21002.1, 21061. This includes the Project's cumulative impacts.

A programmatic EIR, as here, that will be relied by future implementing projects must fully and accurately evaluate the totality of the Project's anticipated environmental impacts, *i.e.*, the project's "cumulative impacts." Without such analysis, the EIR fails as an informational document. Throughout the EIR, in almost each of the impact areas, the DEIR claims that future implementing projects will evaluate its project-specific impacts. The DEIR thus avoids analysis and mitigation of impacts, when it is precisely at this stage that such analysis is necessary to ensure that the "cumulative" effects of the GPU buildout are appropriately considered. It is *only* at this stage that the cumulative impacts associated with the totality of the subject project will be appropriately considered.

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Cont.

**H. Growth Inducing Impacts**

Amending the land use designations of the area north of State Route 60 (west of "World Logistics Prkwy") to Highway Office/Commercial will result in potentially significant growth inducing impacts that have not been fully evaluated and mitigated. Much of the surrounding area is currently served by septic systems. If the area is converted to "highway/commercial" uses, the area will be subject to the development of infrastructure and utilities (roads, sewer and water utilities, etc.) that may induce growth in the surrounding rural areas.

19

**I. The City Must Adopt the Environmentally Superior Alternative**

To ensure that alternatives are properly assessed and considered, CEQA "contains a 'substantive mandate' requiring public agencies to refrain from approving projects with significant environmental effects if 'there are *feasible alternatives* or mitigation measures' that can substantially lessen or avoid those effects.'" *County of San Diego v. Grossmont-Cuyamaca Community College Dist.* (2006) 141 Cal.App.4th 86, 98 (emphasis added); Pub. Res. Code § 21002. A lead agency may not reject an alternative unless the agency makes findings supported by substantial evidence showing that the alternative is infeasible. Public Resources Code §§ 21081 (a), 21081.5; Guidelines, §§ 15091 (a)(3), 15092. Rejected alternatives must be "truly infeasible." *City of Marina v. Bd of Trustees of Calif. State Univ.* (2006) 39 Cal.4th 341, 369 ("*City of Marina*"; *see*, Guidelines § 15364 (defining "feasible")). Absent findings of infeasibility supported by substantial evidence, the City must adopt the Redistributed Growth Alternative. This alternative would reduce VMT according to the DEIR, and therefore should be adopted as it is feasible.

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**J. Conclusion**

For these reasons we urge the City to revise and recirculate the Draft Environmental Impact Report.

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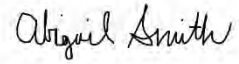
- 19 While areas north of State Route 60 planned for Highway/Commercial are not currently served by sewer, these areas are within the Eastern Municipal Water District service boundaries and service can be provided by connecting to nearby facilities. Section 5.3.2 of the FEIR was revised to clarify the required extension of services. Extension of services to this area would not remove major barriers to growth as facilities are nearby. Additionally, the existing plan has designations north of State Route 60 that would also require the extension of sewer; therefore, the plan does not introduce land uses requiring sewer that do not already exist in the area.
- 20 Comment noted. CEQA Findings fl-1 will be available for review prior to public hearing on the project.
- 21 The comments in this letter did not raise any issues that would require recirculation.

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Sincerely,



Abigail Smith  
Attorney for Sierra Club-San Geronimo Chapter



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Cont.

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**EXHIBIT 1**



Table 4.3-6 Project Peak Operational Emissions Summary

Operational Activities - Summer Scenario	Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>High-Cube</b>						
Area Source	46.46	2.70E-03	0.28	2.00E-05	1.03E-03	1.03E-03
Energy Source	0.33	2.96	2.49	0.02	0.23	0.23
Mobile (Trucks)	19.77	429.96	184.46	1.35	51.09	19.56
Mobile (Passenger Cars)	2.98	3.73	51.43	0.17	16.61	4.46
On-site Equipment	0.95	13.18	4.25	0.02	0.43	0.40
<b>Light Industrial</b>						
Area Source	14.99	9.80E-04	0.10	1.00E-05	3.70E-04	3.70E-04
Energy Source	0.35	3.17	2.66	0.02	0.24	0.24
Mobile (Trucks)	11.28	244.17	107.13	0.78	32.55	11.96
Mobile (Passenger Cars)	4.48	5.60	77.31	0.26	24.98	6.70
On-site Equipment	0.3801	5.27	1.70	6.34E-03	0.17	0.16
<b>Total Maximum Daily Emissions</b>	<b>100.64</b>	<b>689.62</b>	<b>425.85</b>	<b>2.60</b>	<b>125.70</b>	<b>43.17</b>
SCAQMD Regional Threshold	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>YES</b>	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Operational Activities - Winter Scenario	Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>High-Cube</b>						
Area Source	46.46	2.70E-03	0.28	2.00E-05	1.03E-03	1.03E-03
Energy Source	0.33	2.96	2.49	2.00E-02	0.23	0.23
Mobile (Trucks)	20.11	447.95	184.22	1.35	51.10	19.58
Mobile (Passenger Cars)	2.78	3.94	43.52	0.16	16.61	4.46
On-site Equipment	0.95	13.18	4.25	0.02	0.43	0.40
<b>Light Industrial</b>						
Area Source	14.99	9.80E-04	0.10	1.00E-05	3.70E-04	3.70E-04
Energy Source	0.35	3.17	2.66	0.02	0.24	0.24
Mobile (Trucks)	11.46	254.51	111.97	0.78	32.56	11.96
Mobile (Passenger Cars)	4.18	5.02	65.44	0.24	24.98	6.70
On-site Equipment	0.38	5.27	1.70	6.34E-03	0.17	0.16
<b>Total Maximum Daily Emissions</b>	<b>100.66</b>	<b>718.46</b>	<b>420.68</b>	<b>2.57</b>	<b>125.72</b>	<b>43.17</b>
SCAQMD Regional Threshold	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>YES</b>	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Source: (Urban Crossroads, Inc., 2016a, Table 3-7)

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EXHIBIT 2

**TABLE 3-1  
DEVELOPMENT CAPACITY OF ALTERNATIVES 1, 2, AND 3**

Land Use	Units	Quantity		
		Alternative 1	Alternative 2	Alternative 3
Residential – Single Family Detached	DU	61,758	62,922	63,004
Residential Multi-Family Attached	DU	14,662	20,402	19,724
Commercial <sup>1</sup>	GLA	29,677	21,908	21,908
Professional Office	GFA	21,507	19,878	18,743
Public <sup>2</sup>	GFA	9,215	9,215	9,215
Business Park/Industrial	GFA	40,038	46,408	40,391
Park	AC	1,044	1,044	1,044
Open Space	AC	3,927	3,922	3,922
<b>POPULATION</b>		<b>279,697</b>	<b>304,966</b>	<b>302,785</b>

Sources: Urban Crossroads, *General Plan Traffic Study*, June 2004 and P&D Consultants, August 2004.

Since initiation of environmental analysis for the General Plan program, several minor land use amendments have occurred. These amendments have been processed and undergone environmental analysis separate from the General Plan program. Although these amendments are reflected on the Land Use Alternatives maps, they are not incorporated in the development capacities shown in this Table. Nearly all of the amendments are consistent with Alternative 2 and 3.

Notes:

- 1 - includes neighborhood, community, and regional commercial
- 2 - includes schools and government offices

- DU- dwelling units
- GLA- Gross Leasable Area (Thousands of Square Feet)
- STU- Students
- GFA - Gross Floor Area (Thousands of Square Feet)
- AC - Acres

**General Plan Land Use Alternative 1 (Existing General Plan)**

General Plan Land Use Alternative 1 would retain the existing land use plan. **Figure 3-2** depicts Land Use Alternative 1. Alternative 1 includes a few land use categories that were reclassified for mapping purposes: Planned Commercial, Planned Industrial and R5/Office. The Planned Commercial areas are located at the northeast corner of Day Street and Eucalyptus Avenue and the northwest corner of Oliver Street and Iris Avenue. The Planned Commercial areas are shown as Commercial on **Figure 3-2**. The Planned Industrial areas are located at the southeast corner of Theodore Street and SR 60 and the northwest corner of Alessandro Boulevard and Gilman Springs Road. The Planned Industrial areas are shown as Industrial on **Figure 3-2**. The R5/Office designation is located at the southwest corner of Elsworth Street and Cottonwood Avenue. The R5/Office area is shown as Residential/Office on **Figure 3-2**.



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EXHIBIT 3

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**Table 4.3.U: Operational Regional Air Pollutant Emissions (Worst-Case Scenario)**

Scenario	Source	Summer Emissions (pounds per day)				
		VOC	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Buildout, 2012 Factors	Vehicles: Local	283	346	3,861	683	42
	Vehicles: Long-haul trucks	1,129	14,510	5,995	1,473	622
	Area Source	260	7	6	1	1
	<b>Total</b>	<b>1,672</b>	<b>14,863</b>	<b>9,862</b>	<b>2,157</b>	<b>665</b>
	Significance Threshold	55	55	550	150	55
Significant Impact?	Yes	Yes	Yes	Yes	Yes	

- PM<sub>10</sub> and PM<sub>2.5</sub> emissions include exhaust and road dust.  
 - Area source emissions include natural gas, painting, and consumer products. Landscaping emissions are negligible.  
 - Sulfur oxides emissions are under the 150 pounds per day significance threshold and at buildout total approximately 30 pounds per day (24 for long-haul + 6 for local).  
 VOC = volatile organic compounds NO<sub>x</sub> = nitrogen oxides CO = carbon monoxide PM<sub>10</sub> and PM<sub>2.5</sub> = particulate matter  
 Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, MBA January 2013.

Emissions from the existing on-site residences and fugitive dust are not included in this regional analysis. In addition, there may be minor emissions of VOC from the fueling station, depending on what type of fuel is used. However, details regarding the fueling station are currently unknown so the emission source is not estimated.

This is a worst-case analysis because it assumes that the entire project would be built-out in 2012. The motor vehicle and truck emission factors are from 2012, which assumes a "dirtier" fleet than would be the case in later years. The emission factor models assume that later on, the average fleet would be newer as people purchase newer cars, which are more efficient and have fewer air pollutants. In addition, no reductions are taken for the model year 2010 trucks that would be accessing the project pursuant to project design features.

As identified in Table 4.3.U, operational emissions for the proposed project would exceed SCAQMD daily operational thresholds for all criteria pollutants with the exception of SO<sub>x</sub> for the "worst-case" 2012 scenario. Table 4.3.V demonstrates that although the number of vehicles and trucks would increase year by year, the emissions do not increase dramatically because the per-vehicle emission factors decrease over time.

**Table 4.3.V: Operational Regional Air Pollutant Emissions (Year by Year, pounds per day)**

Year	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2014	108	388	645	3	218	25
2015	222	838	1,288	6	462	54
2016	290	1,121	1,643	8	613	72
2017	415	1,838	2,289	11	885	105
2018	554	2,215	2,957	15	1,210	147
2019	626	2,528	3,237	17	1,390	173
2020	678	2,772	3,409	19	1,533	187
2021	721	2,998	3,577	21	1,663	201
2022	733	3,064	3,524	21	1,705	205
SCAQMD Threshold	55	55	550	150	150	55
Significant?	Yes	Yes	Yes	No	Yes	Yes

- Emissions are from local vehicles, trucks, natural gas, painting, and consumer products.  
 - PM<sub>10</sub> and PM<sub>2.5</sub> emissions include exhaust and road dust.  
 - Landscaping emissions are negligible.  
 VOC = volatile organic compounds NO<sub>x</sub> = nitrogen oxides SO<sub>2</sub> = sulfur dioxide CO = carbon monoxide  
 PM<sub>10</sub> and PM<sub>2.5</sub> = particulate matter  
 Source: *Air Quality, Greenhouse Gas, and Health Risk Assessment Report*, January 2013.

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**EXHIBIT 4**

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The 2011 NAIOP provides the more accurate trip generation for the proposed project as the NAIOP study is the most comprehensive trip study performed for high-cube logistics warehouses. As shown in previously referenced Table 4.15 K, when using the NAIOP and derived trip generation rates, project trips are forecast to be lower than if the ITE trip generation rates were used. However, in order to be conservative, this EIR and the TIA utilize the ITE 9<sup>th</sup> Edition trip rates, which has the effect of overestimating project impacts. Therefore, as determined in the TIA, trip generation rates for high-cube warehouse uses (Land Use 152) as published in the 9<sup>th</sup> Edition of ITE's *Trip Generation* manual, and currently widely accepted throughout Riverside and San Bernardino Counties, are the trip rates being utilized to determine the project's traffic impacts. The project trip generation is shown in Table 4.15 L.

**Table 4.15.L: Project Trip Generation of Proposed and Existing Land Uses**

Land Use Type	Unit	AM Peak Hour			PM Peak Hour			ADT
		In	Out	Total	In	Out	Total	
<b>Proposed Land Uses</b>								
High-Cube Logistics Center (ITE 152)	KSF	0.076	0.034	0.110	0.037	0.063	0.120	1.680
Light Logistics (ITE 150)	KSF	0.237	0.063	0.300	0.080	0.240	0.320	3.560
Utilities Servicing Station (ITE 170)*	KSF	0.720	0.080	0.800	0.342	0.418	0.760	8.000
Gas Station w/ Convenience Store (ITE B45)	Pumps	5.08	5.08	10.16	6.76	6.76	13.51	162.76
Convenience Store (ITE 851)	KSF	33.52	33.52	67.030	26.729	25.661	52.410	737.990
<b>Existing Land Uses</b>								
Single-Family Dwellings (ITE 210)	DU	0.180	0.563	0.750	0.830	0.370	1.000	9.520
Utilities Servicing Station (ITE 170)*	KSF	0.720	0.080	0.800	0.342	0.418	0.760	8.000

\* Note: A.M. directionality taken from table for trips/employee. Daily is assumed to be ten time peak-hour rates.  
KSF = Thousand Square Feet  
DU = Dwelling Unit  
ADT = Average Daily Trips  
Source: Traffic Impact Analysis Report for the World Logistics Center, Parsons Brinckerhoff, January 2013.

The project is estimated to generate a net total of approximately 71,085 daily trips with approximately 4,672 occurring during a.m. peak hour and 5,101 occurring during the p.m. peak hour. Daily and hourly trip counts take into account only the trips generated by the project. Refinements to raw trip generation estimated using the ITE rates have been made to provide a more detailed breakdown of trips by vehicle mix, similar to the existing baseline count data. Per City of Moreno Valley standard practice, vehicle mix percentages were obtained from the City of Fontana *Truck Trip Generation Study* (August 2003), a recognized source throughout the County of Riverside and the County of San Bernardino for estimating the vehicle mix associated with industrial and warehouse uses. Although ITE provides truck trip generation information for the high-cube logistics warehouse use, these data are not considered as comprehensive as the data available in the Fontana Study nor are they specific to large warehouses/distribution centers in Southern California. As such, the vehicle-mix from the Fontana *Truck Trip Generation Study* has been applied to ITE trip generation rates in order to determine the proposed project's passenger car and truck trip generation. Table 4.15 M shows the project trips by vehicle type.

Trip distribution represents the probable starting and ending locations of traffic generated by a project. Trip distribution is heavily influenced by the geographical location of a project site in relation to local and regional land uses (i.e., the starting and ending locations), and access to a project site from the local and regional transportation system. The proposed project's trip distribution was developed for both passenger cars and trucks:

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**EXHIBIT 5**

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**4.7.6 Significant Impacts**

**4.7.6.1 Greenhouse Gas Emissions**

Threshold:	Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
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Future development that could occur within the proposed project site could generate GHG emissions during both construction and operation activities. The following activities are associated with the proposed project and could directly or indirectly contribute to the generation of GHG emissions:

- **Removal of Vegetation:** The net removal of vegetation for construction results in a loss of the carbon sequestration in plants. However, planting of additional vegetation would result in additional carbon sequestration and would lower the carbon footprint of the project.
- **Construction Activities:** During construction of the project, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. Furthermore, CH<sub>4</sub> is emitted during the fueling of heavy equipment.
- **Gas, Electric, and Water Use:** Natural gas use results in the emissions of CH<sub>4</sub> (the major component of natural gas) and CO<sub>2</sub> from the combustion of natural gas. Electricity use can result in GHG production if the electricity is generated by combusting fossil fuel. California's water conveyance system is energy-intensive. Preliminary estimates indicate that the total energy used to pump and treat this water exceeds 6.5 percent of the total electricity used in the State per year.<sup>1</sup>
- **Solid Waste Disposal:** Solid waste generated by the project could contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy for transporting and managing the waste, and they produce additional GHGs to varying degrees. Landfilling, the most common waste management practice, results in the release of CH<sub>4</sub> from the anaerobic decomposition of organic materials. CH<sub>4</sub> is 25 times more potent than CO<sub>2</sub>. However, landfill CH<sub>4</sub> can also be a source of energy. In addition, many materials in landfills do not decompose fully, and the carbon that remains is sequestered in the landfill and not released into the atmosphere.
- **Motor Vehicle Use:** Transportation associated with the proposed project would result in GHG emissions from the combustion of fossil fuels in daily automobile and truck trips.

**Construction Emissions.** The project would emit GHGs mainly from direct sources such as removal of vegetation and combustion of fuels from worker vehicles and construction equipment, as shown in Table 4.7.E. The GHG emissions are from all phases of construction and assume a one-time change in the carbon sequestration capacity of the land. The project may also generate construction waste, which in turn, could emit greenhouse gases. These emissions are not estimated because it is unknown how much construction waste the project would generate. The California Green Building Standards require that the project divert at least 50 percent of construction waste.

**Table 4.7.E: Construction Greenhouse Gas Emissions**

Year	Annual Emissions (mt CO <sub>2</sub> e)
2013	95,692
2014	37,927
2015	31,634

<sup>1</sup> California Energy Commission (CEC), 2004. *Water Energy Use in California* (online information sheet). Sacramento, CA. August 24. Website: [energy.ca.gov/energy/industry/water.html](http://energy.ca.gov/energy/industry/water.html). Accessed July 24, 2007.

**World Logistics Center Project  
Draft Environmental Impact Report**

**Table 4.7.E: Construction Greenhouse Gas Emissions**

Year	Annual Emissions (mt CO <sub>2</sub> e)
2016	26,947
2017	94,510
2018	41,743
2019	34,665
2020	26,818
2021	26,818
Refrigerant installation	849
Land use change (conversion from crop to urban)	16,523
<b>Total</b>	<b>434,126</b>
<b>Averaged over 30 years</b>	<b>14,471</b>

mt CO<sub>2</sub>e = metric tons of carbon dioxide equivalents  
 Source: Table 61, MBA 2013, of year by year emissions: CalEEMod unmitigated output and summary prepared by Michael Brandman Associates (MBA 2013, Appendix A)  
 Source of refrigerant emissions: refrigerant spreadsheet prepared by Michael Brandman Associates (MBA 2013, Appendix A)  
 Source of land use change: CalEEMod output for area sources.

**Operational Emissions, Worst-Case Scenario.** Operational or long-term emissions occur over the life of the project. However, CEQA requires an analysis of project buildout superimposed over existing (baseline) conditions. Therefore, operational emissions for this worst-case buildout condition are shown in Table 4.7.F. The vehicle emissions in the table represent travel within the South Coast Air Basin, the long-haul trucks travel an average of 50 miles per trip and the local vehicles travel between 9.6 and 15.4 miles per trip. The emissions do not take into account project design features to reduce emissions, such as the use of model year 2010 and later medium and heavy-heavy duty trucks on the project site. As shown in the table, the project emissions are well over the SCAQMD's significance threshold of 10,000 mt CO<sub>2</sub>e per year. Therefore, emissions are potentially significant.

The analysis presented in Table 4.7.F also represents a worst-case analysis because the emission factors do not take into account full reductions from regulation or reductions from newer trucks and cars.

**Table 4.7.F: Project Operational GHG Emissions, Buildout over Existing (Worst-Case Analysis)**

Source	Emissions Prior to Mitigation (mt CO <sub>2</sub> e/year)
Local vehicles	85,593
Long-haul trucks	380,401
Electricity	112,885
Natural gas	1,379
Water	2,325
Waste	153,318
Refrigerants	1,412
Construction	14,471
<b>Total</b>	<b>751,787</b>
<b>Significance Threshold</b>	<b>10,000</b>
<b>Significant Impact?</b>	<b>Yes</b>

Letter I-1

**From:** [Oscar A. Alvarez](#)  
**To:** [Chris Ormsby](#)  
**Subject:** Initial Comments on the MV2040 General Plan Update (GPU), Housing Element (HE), Climate Action Plan (CAP) and EIR (Published in April 2021)  
**Date:** Sunday, May 16, 2021 12:11:13 AM  
**Attachments:** MV2040 General Plan - Climate Action Plan Comments Final.docx

**Warning: External Email – Watch for Email Red Flags!**

Dear Mr. Chris Ormsby,

Thank you and your team for your hard work in preparing the subject documents.

The MV2040 GPU, HE, CAP and EIR present us with a great opportunity to meet the challenges of the present and future with innovation, determination and leadership in the County of Riverside, while we assure minimum impact on the short- and long-term quality of life and well-being of the residents in the City, and at the same time providing a sustainable future for our next generations.

Attached please find my comments to these documents. I do not represent any organization. I am a long-time resident of this city, and I prepared my comments using current applicable scientific, engineering and policy reports, and my own experience obtained during my 32-year public service career for the largest municipal utility in the country in the areas of system resilience, reliability and planning.

I believe my comments balance the City's objectives of economic growth and project development with the overarching core values of the City, which have been the safekeeping of a healthy and self-sustaining environment, protecting and promoting the health and well-being of current and future generations, and fully promoting democracy and encouraging citizen involvement.

Finally, I respectfully request that you consider my comments fully, and provide me with brief responses to my recommendations and questions before the Planning Commission public hearing meeting, to be held on May 27th, 2021.

Thank you in advance for your time and consideration  
- Oscar Alvarez

1a

1a Introductory comment noted.



**MoVal 2040 (MV2040) General Plan Update (GPU), Housing Element (HE),  
Climate Action Plan (CAP) and EIR Comments**

**Oscar Alvarez – 5/15/21**

PROLOGUE: I have been living in Moreno Valley since 1990. I have three children who grew up here, and four small grandchildren, and they all live in the area. The MV2040 GPU, HE, CAP and EIR present us with a great opportunity to meet the challenges of the present and future with innovation, determination and leadership in the County of Riverside, while we assure minimum impact on the short- and long-term quality of life and well-being of the residents in the City, and at the same time providing a sustainable future for our next generations.

My comments are provided for the April 2021 published version of the subject plans and reports, and are informed by the proposals themselves; current applicable scientific, engineering and policy reports; and my own experience obtained during my 32-year public service career for the largest municipal utility in the country in the areas of system resilience, reliability and planning.

My comments balance the City's "objectives of economic growth, ample housing options, livability, and stewardship of environmental resources" with the overarching core values of the City: to safekeep a healthy and self-sustaining environment, protect and promote the health and well-being of current and future generations, and to fully promote democracy and encourage citizen involvement.

I believe my comments, respectfully submitted, are consistent with these objectives and core values, will help my children and grandchildren lead a healthier and better life, and will make the City better place to live in the future.

1b

1b Comments noted. The comment does not raise issues regarding the adequacy of an EIR. Issues of environmental justice are addressed within the proposed Environmental Justice Element of the General Plan.

**Summary of Comments**

1. CLIMATE CHANGE FACTS, FEDERAL AND CALIFORNIA COMMITMENTS TO GREENHOUSE GAS (GHG) EMISSIONS MITIGATION, AND CURRENT STATE OF THE AIR QUALITY IN MORENO VALLEY – The UN Intergovernmental Panel on Climate Change Report requires the world to maintain increase of temperature within 1.5 degree Celsius (to avoid irreversible damage to the planet) by cutting in half fossil emission by 2030, and becoming carbon neutral by 2040 (or 2050 with a greater risk to fail).

In May 2021, the EPA reported in its latest data that global warming is making life harder for Americans, and threatens their health, safety, communities and way-of-life. The combination of rising temperatures and melting polar ice is causing sea levels to rise on the East Coast and Gulf Coast; in some areas the sea levels rose more than 8 inches from 1980 to 2020, the number of days when water has inundated communities has increased, and the rate of flooding is accelerating.

In April 2021, the American Lung Association issued its “State of the Air 2021” report, which continues to find San Bernardino, Riverside and Los Angeles counties ranking first, second and third as the nation’s smoggiest counties, and have had the worst air quality for most of the last 20 years.

The CalEnviroScreen tool shows that Moreno Valley already experiences heavy burdens of pollution and vulnerabilities, including ozone, PM2.5 and diesel particulate matter levels of burden that contribute to asthma, lung cancer, high blood pressure and cardiovascular disease (heart attacks and strokes). All of us living in Moreno Valley suffer with this unhealthy air, but even worse, people of color are two or three times more likely to be breathing the most polluted air than (are) white people

In April 2021, President Biden committed the nation to reduce GHG emissions from by 50-52% below 2005 levels by 2030. The State of CA has already an overall goal of carbon neutrality by 2045, with intermediate steps.

In May 2021, the South Coast Air Quality Management District approved the Warehouse Indirect Source Rule (PR 2305) which requires warehouses, and indirectly diesel-fueled trucks serving them, to cut chronic air pollution linked to asthma, cancer and deaths in Los Angeles, Orange, Riverside and San Bernardino counties. The district report on the rule confirms what we already know: diesel exhaust from trucks aggravates breathing problems and heart problems, and cancer, and neighborhoods close to warehouses already face substantially higher burdens of pollution than other neighborhoods, with most affected communities having higher poverty rates and the majority being Hispanics and African Americans.

2. MODIFICATIONS ARE NECESSARY TO THE MV CLIMATE ACTION PLAN TO BE CONSISTENT WITH FEDERAL AND STATE COMMITMENTS AND PROJECTIONS TO MITIGATE THE EXISTENTIAL THREAT OF CLIMATE CHANGE – Despite that Moreno Valley already experiences heavy burdens of pollution and vulnerabilities that affect very seriously the health and quality of life of its inhabitants, the current MV Climate Action Plan does not decrease the total amount of emissions in the City in 20 years. It estimates the total emission in the City at 100% in the year 2018 (866, 410 MTCO2E), and calculates a “mitigated” total

2 Comments noted. The comment does not raise issues regarding the adequacy of an EIR. Issues of environmental justice are addressed within the proposed Environmental Justice Element of the General Plan.

3 The comment incorrectly states that it is necessary to reduce total mass emissions in the City in 20 years. Emissions will inherently increase in the City due to planned growth. The appropriate metric for consideration is per capita reductions in GHG. The CAP appropriately demonstrates reductions in per capita GHG consistent with State reduction targets. Issues of environmental justice are addressed within the proposed Environmental Justice Element of the General Plan. The comment does not raise issues regarding the adequacy of an EIR.

emissions with the CAP strategies at 105.4% (913,365 MTCO2E) by 2040, an actual increase of about 5.4% in total emissions (See figure below).

The City of Moreno Valley has the authority and ethical imperative of requiring any proposed project to mitigate its emissions on a downward trajectory throughout the life of the project, and reaching net-zero emissions at a time certain to protect the well-being and quality of life of the Moreno Valley residents. By taking this bold and necessary action, the City leaders will protect the environment and the well-being of the people in Moreno Valley, and will implement emission mitigation approaches consistent with those requested from the United Nations Intergovernmental Panel on Climate Change, and federal and state governments.

Thus, a new MV CAP needs to be developed that approximates the downward GHG trajectory as proposed by the State of CA and president Biden commitments. The following MV CAP will mitigate GHG emissions: Baseline of 100% (866,410 units) in 2018, 40% below 2018 (519,846 units) by 2030, 52% below 2018 (415,876 units) by 2040, and 100% below 2018 by 2045.



The new MV CAP, as any other plan, requires corresponding project review mechanisms, including emissions measurements/projections, effective mitigation, use of on-site solutions, and monitoring progress with GHG goals on an annual basis. This plan is responsive to the needs of the residents of Moreno Valley, calls for environmental justice to vulnerable communities of color, and takes action consistent with existing scientific evidence to avert climate change disaster.

*Key Questions: a) The Final EIR, GPU and new MV CAP will need to be coordinated and fully explain how the City's emissions will meet the downward trajectory as projected by federal and state goals, otherwise these documents will be inadequate; how will the City accomplish this? b) The Final EIR, GPU and MV CAP must fully explain how progress will be monitored and verified over the next 25-30 years, how will this be done specifically? c) What will be the specific steps the City will take to inform the public every two years (as recommended in Section XII) that the City is meeting its fair share of reducing Greenhouse Gases(GHG), and in what form will it be reported?*

Further, investments to achieve these goals will bring jobs to MV in the areas of energy efficiency, electrification of trucks (and its charging infrastructure) and buildings; extensive use of solar panels and other renewable resources; changing homes and buildings from natural gas to electricity, smart city growth, and other advanced technological solutions that may be developed in the future and that are consistent with or better than the state and city goals. Training of workers in the fossil and other industries needs to get started now, to timely effect this transformation.

3. THE MV UTILITY INTEGRATED RESOURCE PLAN AND CLEAN ENERGY GOALS NEED TO BE COORDINATED WITH THE MODIFIED MV CAP, AND FEDERAL AND STATE COMMITMENTS AND PROJECTIONS - The State of California requires utilities to achieve 50% renewable resources by 2030 (SB 350) and 100% by 2045 (SB100). President Biden has committed the nation to reach 100% of renewable energy (carbon free energy sources) by 2035.

The MV Utility 2018 Integrated Resource Plan shows the possibility of the City to reach 100% of renewable energy by 2030, using an accelerated scenario. To achieve this goal and support GHG mitigation efforts, the City needs to update its 2018 IRP to consider the future changing demand characteristics for the next 20 years, which will include by 2040 extensive use of solar panels, electric passenger cars and charging infrastructure, appliances and heating equipment switching from natural gas to electric, potentially utility solar/wind energy and storage, and other technical and reliability matters.

*Key Questions: a) What methodologies and tools will the EIR, GPU and MV Utility use to study and project the most effective investments and methodologies to use to reduce GHG emissions in our area under various assumptions; to meet the downward trajectory of state and federal goals? b) How will this be documented? c) What methodologies and tools will the EIR, GPU and MV Utility use to perform sensitivity analysis, such as allowing maximum coverage of all commercial/warehouse buildings with solar, instead of the current 50% discussed in this paper, to quantify the additional GHG emissions mitigation for our City and region?*

It should also investigate building its own renewable energy resource(s), to energize the City 100% by 2030, or earlier. Excess energy could be sold to the market for additional revenue. Clearly, this energy transition will bring extensive improvements in air quality and health across all areas in the city, both to disadvantaged and non-disadvantaged, and as the City transitions to a 100% renewable energy, many jobs will be created as further described in Sections II and V.

4. ENVIRONMENTAL JUSTICE AND PROJECT APPROVAL PROCESS ISSUE CONCERNS - Environmental justice issues should be considered and a modified CAP be implemented to mitigate GHG emissions, with trajectories consistent with the President commitment and the overarching policies of the State of CA. By taking this bold and necessary action, the City leaders will provide relief to neighborhoods already suffering from substantially higher burdens of pollution, communities that generally have higher poverty rates, and Hispanics and African Americans residents.

4

5

4 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

5 Issues of environmental justice are addressed within the proposed Environmental Justice Element of the General Plan. Regarding public participation, the City conducted numerous public outreach efforts and provided materials in Spanish where feasible. The comment does not raise issues regarding the adequacy of an EIR.

LETTER

RESPONSE

*Key Questions: a) What are the short- and long-term plans that MV will use to reduce the number of residents living/working within state designated Disadvantage Community? B) How does the City propose to use the GPU and new CAP to monitor these plans?*

Furthermore, every resident should be given a fair chance to participate in the review of proposed projects, with enough time and complete information, in their own language (at least in English and Spanish - per the US Census Bureau, MV population is around 58% Hispanic), and with the City providing responses to comments on a written basis. Too many times we have seen incomplete information provided, not enough time to review, and convoluted and confused changes to projects which make the review process difficult, if not impossible. If this process is not improved, we are making a mockery of our democratic process.

5. JOBS CREATION – As we prepare for the future, jobs should be diversified and with emphasis on healthcare, robotics, medical equipment, electric vehicles and component parts, logistics, energy efficiency, electrification of homes from natural gas to electricity, semiconductor industry, and other advanced technology developed. Balancing these jobs, emphasizing all of them, will bring prosperity to the City, and is the way to the future for our younger generations.

Also, businesses related to health (e.g. yoga studios, health food stores and supermarkets) need to be incentivized, and more regional cultural (e.g. Moreno Valley Film Festival) and sports (e.g. AYSO regional soccer tournaments) events should be coordinated and incentivized to bring people and business to the City.

6. TREES, TREES, TREES - Trees provide environmental benefits that directly improve human health and our quality of life by cleaning GHG and lung-damaging chemicals while cooling the City. As we all know, this is done by (amongst other things): absorbing NOx and SO2, capturing dust and smoke, releasing oxygen, shading building surfaces and street pavement which lowers local air temperatures, and reducing the demand for heating and A/C units.

The City needs to establish a 3-year program to plant trees along our main boulevards, avenues and streets, as they are an effective way to fight Climate Change, can work as noise barriers, and improve property values, amongst other many things.

7. BUILD CITIES FOR PEOPLE, NOT CARS – Bicycles will be one of the keys to fight Climate Change and Air Quality issues in the future. If the City of Moreno Valley makes it easier for people to walk, bike and take the bus, fewer GHG and lung-damaging chemicals will be emitted by oil-burning transportation.

The City must protect bicyclists by educating residents on the right of way, safety and respect for bicyclist; the City must also triple bike lanes within the next 5 years, creating a strong network - they will come if you build them.

*Key Questions: Our City continues to be designed for cars and not people. The proposed EIR, GPU and CAP fail to significantly change this pattern. a) What significant changes will be added to the documents to make walking and riding bikes more friendly to the population, and also encourage them to use public transportation? b) How many more miles of multi-use trails will be added? c) The Final*

6

7

a

6 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

7 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

8 A focus of the land use plan was to focus density along major transportation corridors where services are available and accessible to residents. The General Plan Circulation Element addresses the bicycle network and connectivity. The comment does not raise any issues regarding the adequacy of an EIR.

LETTER

RESPONSE

EIR must show how close each multi-family/high density zoning is to shopping locations, and if there are sidewalks/bike paths/multi-use trails connecting them, otherwise it will be inadequate.

8. SENIORS – The City needs to plan implementation of new facilities and expanding existing and new programs to accommodate the increasing Senior population in the City (Senior population in the state is projected to increase around 50% by 2030); work and coordinate with the State to obtain additional resources to meet expected increase in demand for Senior services by 2030; and work and coordinate with county, state and federal agencies to facilitate access to the treatment of mental health (e.g. depression and loneliness) issues.

9. CITY SHOULD PLAY A STRONGER ROLE IN HELPING WITH THE HEALTH AND FUTURE OF LOW-INCOME CHILDREN, AND RETHINK LIBRARY USE TO HELP MORE WITH OVERALL EDUCATION CHILDREN - Researchers have found within the last 15 years that poverty and home struggles correlate with children’s brain development, including limiting the areas of language, impulse control, learning and memory, and the ability to avoid addictions and become a contributing member of the society. The City should establish a pilot project to help single mothers with young children living in poverty that provides them with a monthly stipend (\$100-300 for 5 years), and monitor how it helps the healthy development of their children by comparing with others not receiving the help. If it shows promise, the project can be expanded.

The City should devote certain parts of our libraries to provide our children with working spaces and technology, where they can pursue activities that encourage self-learning, curiosity, explorations and project building; this can be done with the help of staff, or in coordination with local schools. Libraries can also offer workshops and short area trips for all children in Moreno Valley so they can learn about nature, the environment, climate, science and urban development. All these actions will strengthen the possibility that we will have adults who are physically and mentally healthier, and contributing members of society.

10. HOUSING CRISIS AND SOLUTIONS FOR YOUNG FAMILIES - Conduct workshops in the City for first time home buyers on programs available at the local, state and private levels. Require developers to set apart a good percentage of units and homes for first-time, young family buyers. Pursue alliances with the state and federal government to obtain funds and loans for MV residents, and propose and/or support new legislation to attain these goals.

11. COMMUNITY CHARACTER - INCREASE AWARENESS AND PRIDE OF THE CITY BY CREATING HARMONY AND UNITY AROUND IT - The City needs to improve its community character by pursuing the following approaches: providing residents information on City activities on its website, and markers at the entrance of trails and locations with historical importance; establishing a mobile City Hall; facilitating more accessibility to the Mayor and City Council members by conducting meetings “for coffee” or “at the park” with constituents; setting banners around the City for important events or City activities (e.g. Film festivals, soccer tournaments, General Plan Update, Moreno Valley Utility prizes) – we need to “blow our horn”, and loud, otherwise the City is invisible to its residents.

9 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

10 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

11 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

12 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

LETTER

RESPONSE

12. GOALS AND ACTIONS – CREATING RESPONSIBILITY AND ACCOUNTABILITY - Goals and Actions as stated in the GPU, HE, EIR and CAP should be monitored for progress no later than every two years with public participation, and with assigned responsibility and accountability to a City Department/Group, and with measurable objectives and due dates.

*Key Question: What document and process will be implemented to monitor progress of Goals and Actions as stated in the GPU, HE, EIR and CAP, no later than every two years with public participation, and with assigned responsibility and accountability, measurable objectives and due dates?*

I. CLIMATE CHANGE FACTS, FEDERAL AND CALIFORNIA COMMITMENTS TO GREENHOUSE GAS (GHG) EMISSIONS MITIGATION, AND CURRENT STATE OF THE AIR QUALITY IN MORENO VALLEY

The United Nations IPCC Report and US Environmental Protection Agency Data - According to the United Nations Intergovernmental Panel on Climate Change (IPCC) 2018 Report, to avoid passing the 1.5 degrees Celsius (2.7 degrees Fahrenheit) limit over pre-industrial levels would require a "rapid and far-reaching transformation of human civilization at a magnitude that has never happened before". What is needed in the world to limit climate change is to effect sweeping changes in energy, transportation and other systems that have "no documented historic precedent".

Nevertheless, the report is hopeful that staying within the 1.5 degrees Celsius change is still possible. It is important to keep this limit in the Earth's average temperature because some places in the world have already crossed that limit, and the climate crisis is already here. These higher temperatures are already causing droughts and hunger, glaciers are melting, storms and hurricanes are getting stronger and more devastating, etc. Because of this evidence and many studies, scientists have determined that the 1.5 degrees limit may be seen as a general indicator of where many climate impacts – on balance – go from destructive to catastrophic.

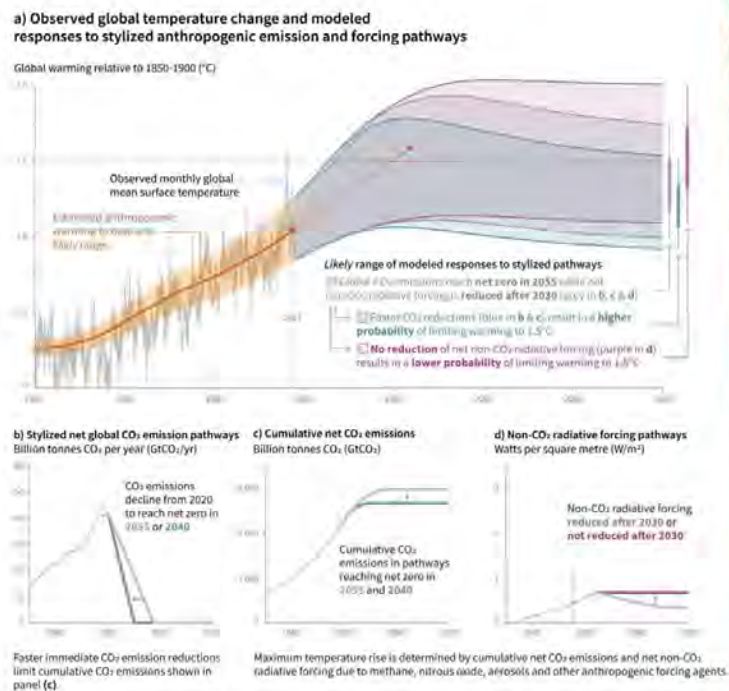
The IPCC projects that going from 1.5 degrees to 2 degrees will make billions of people on earth experience severe heatwaves at higher rates, the seas will rise on average about 4 inches, several hundred million additional people will become more exposed to poverty, the ocean's health will be compromised, and fishing volumes will continue to decline further, amongst other things.

The report also notes that human activities (i.e. mainly burning fossil fuels) have already caused about 1 degree of global warming (see Figure 1 below), and in conjunction with all the greenhouse gases we have already emitted, average temperatures will keep rising.

13

13 Comment noted. This comment cites information unrelated to the EIR analysis.





13 cont.

**Figure 1.** Levels of Cumulative Emissions of CO<sub>2</sub> Determine Ability to Limit Warming to 1.5 Degrees Celsius (2.7 degrees Fahrenheit) – from IPCC Report

**Panel a** in above figure shows that it is possible to hold the temperature change within the desired limit, but it will take CO<sub>2</sub> emissions to decline at rates shown on **Panel b** (net global CO<sub>2</sub> emissions to reach 0 by 2040 or 2055). As an example, the world's annual carbon dioxide emissions (approximately 40 billion tons per year), would have to be reduced this decade (2020-2030) at a rate higher than 1 billion tons per year (cutting fossil fuel emissions in half by 2030 will be a big part of this effort). Again, by around 2040-2055, the report calls for a total phaseout of the burning of coal.

**US Environmental Protection Agency Data** - In May 2021, the EPA compiled the latest up-to-date data showing that global warming is making life harder for Americans, and threatens their health, safety, communities and way-of-life. According to the data, heat waves in large US cities has tripled, from two to six each year, and nights are becoming hotter, making it difficult

for plants, animals and people to cool down; the Arctic sea ice cover in 2020 was the second smallest on record.

According to the EPA, the combination of rising temperatures and melting polar ice is causing sea levels to rise on the East Coast and Gulf Coast; in some areas the sea levels rose more than 8 inches from 1960 to 2020, and the number of days when water has inundated communities has increased, and the rate of flooding is accelerating.

County of Riverside - No matter how it is presented, it is a fact that Riverside County has one of the worst air qualities in the nation. In fact, San Bernardino, Riverside and Los Angeles counties rank first, second and third as the nation's smoggiest counties, and have been with the worst smog levels for most of the last 20 years, according to the American Lung Association (ALA) "State of the Air 2021" issued in April 2021.

According to the report, climate change causes increase in wildfires and heat, and are contributing to ongoing air quality challenges, with the transportation sector continuing to be the primary factor. Scientists have been asking state lawmakers to invest \$1 billion in zero-emission vehicle infrastructure, and for stronger zero-emission rules for a wider range of vehicles and trucks. According to the ALA report, "[m]ore than 40% of Americans — more than 135 million people — are living in places with unhealthy levels of ozone or particle pollution," and "[t]he burden of living with unhealthy air is not shared equally. People of color are more than three times more likely to be breathing the most polluted air than (are) white people."

13 cont.

Although there has been some progress in Riverside County as "orange" (unhealthy range) and "high ozone" days have generally dropped, more than 80% of Riverside County residents (including the City of Moreno Valley) continue to live with unhealthy air, especially during the summers, creating risks for the general population and greater challenges for the vulnerable population (those diagnosed with child and adult asthma, chronic pulmonary disorders and cardiovascular disease).

For instance, in the summer of 2018, the South Coast Air Basin (Los Angeles, Orange, Riverside and San Bernardino Counties) "violated federal smog standards for about 87 consecutive days, the longest stretch of bad air in at least 20 years": [state monitoring data show](#). See also Table 1. "The streak is the latest sign that Southern California's battle against smog is faltering after decades of dramatic improvement". The ozone pollution lasted from June-September, and exceeded the federal health standard of 70 parts per billion somewhere across Los Angeles, Orange, Riverside and San Bernardino Counties (we need to keep in mind that inland communities ozone levels are worse than in Los Angeles and Orange, most of the time).

Health experts agree that ozone and other regional air pollutants continue to contribute to asthma and other lung diseases, as well as heart disease, reproductive and developmental issues, and respiratory infections, even below their regulatory limits. The persistence of dirty air throughout the last 20 years has been a troubling sign that demands cities in CA to curb these pollution levels too decrease risk on our population, including the most vulnerable.

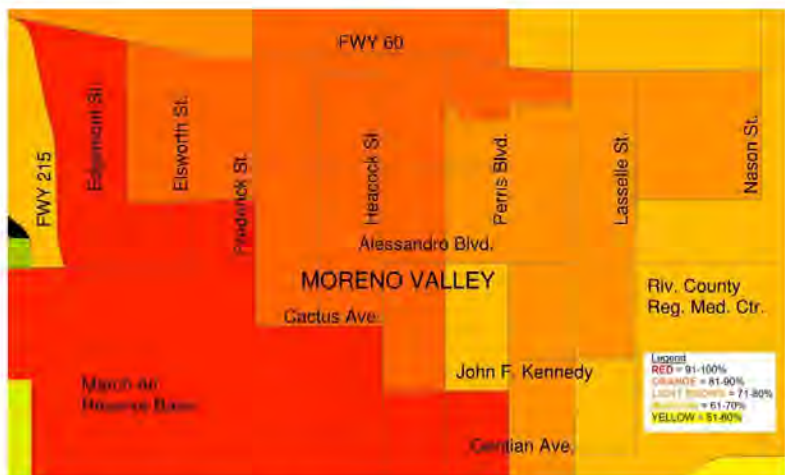
Furthermore, air quality experts further agree that even simple activities, such as walking to school or playing outside after school have turned into health threats; "this is a public health threat that's out of their control."

Note: This AQMIS Ozone page reflects the 2015 National 8-Hour Ozone Standard of 0.070 ppm

South Coast Air Basin Daily Max 8 Hr Overlapping Avg Ozone - Nati at Highest Site 2018 Parts Per Billion ( ppb )												
Day	Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	Oct	Nov	Dec
1	55.0	64.0	48.0	74.0	56.0	73.0	79.0	86.0	91.0	50.0	52.0	42.0
2	48.0	59.0	42.0	57.0	46.0	100.0	88.0	86.0	76.0	41.0	53.0	45.0
3	40.0	59.0	47.0	63.0	61.0	100.0	81.0	87.0	73.0	35.0	70.0	47.0
4	49.0	66.0	48.0	77.0	74.0	91.0	75.0	87.0	82.0	39.0	67.0	47.0
5	45.0	69.0	51.0	76.0	84.0	82.0	96.0	92.0	84.0	50.0	63.0	38.0
6	43.0	54.0	52.0	69.0	85.0	75.0	88.0	111.0	87.0	56.0	59.0	42.0
7	42.0	49.0	48.0	56.0	83.0	87.0	99.0	113.0	92.0	54.0	59.0	38.0
8	34.0	49.0	54.0	62.0	102.0	104.0	78.0	73.0	107.0	53.0	60.0	41.0
9	45.0	57.0	58.0	66.0	104.0	86.0	77.0	88.0	83.0	57.0	53.0	40.0
10	37.0	49.0	33.0	80.0	78.0	84.0	79.0	77.0	81.0	52.0	55.0	35.0
11	39.0	51.0	38.0	62.0	46.0	100.0	74.0	81.0	90.0	51.0	66.0	41.0
12	45.0	45.0	44.0	60.0	51.0	97.0	78.0	74.0	77.0	54.0	46.0	43.0
13	50.0	48.0	37.0	59.0	57.0	80.0	75.0	82.0	74.0	43.0	45.0	45.0
14	52.0	44.0	44.0	74.0	68.0	80.0	86.0	93.0	68.0	53.0	45.0	39.0
15	52.0	50.0	49.0	68.0	68.0	67.0	76.0	91.0	72.0	55.0	40.0	42.0
16	47.0	52.0	45.0	53.0	68.0	54.0	86.0	84.0	68.0	51.0	47.0	49.0
17	51.0	54.0	50.0	58.0	62.0	50.0	104.0	92.0	73.0	53.0	56.0	45.0
18	54.0	56.0	48.0	67.0	57.0	66.0	83.0	89.0	75.0	52.0	62.0	44.0
19	53.0	46.0	53.0	50.0	64.0	98.0	80.0	99.0	80.0	57.0	49.0	42.0
20	45.0	48.0	55.0	61.0	61.0	106.0	84.0	90.0	72.0	60.0	54.0	45.0
21	47.0	49.0	50.0	74.0	46.0	105.0	80.0	81.0	79.0	67.0	56.0	39.0
22	44.0	47.0	37.0	84.0	52.0	125.0	72.0	74.0	88.0	65.0	41.0	48.0
23	47.0	49.0	53.0	76.0	63.0	96.0	106.0	77.0	71.0	64.0	41.0	43.0
24	45.0	49.0	52.0	72.0	61.0	80.0	112.0	80.0	68.0	65.0	40.0	54.0
25	44.0	53.0	53.0	77.0	56.0	94.0	114.0	85.0	75.0	71.0	44.0	42.0
26	46.0	58.0	52.0	74.0	46.0	98.0	101.0	87.0	74.0	71.0	45.0	40.0
27	50.0	46.0	54.0	67.0	61.0	88.0	111.0	81.0	85.0	80.0	47.0	42.0
28	47.0	50.0	56.0	73.0	83.0	85.0	96.0	74.0	73.0	79.0	49.0	44.0
29	44.0		67.0	61.0	82.0	75.0	83.0	72.0	59.0	80.0	42.0	44.0
30	40.0		72.0	50.0	64.0	76.0	92.0	77.0	54.0	60.0	42.0	45.0
31	55.0		73.0		56.0		85.0	96.0		52.0		44.0
MAX:	55.0	69.0	73.0	84.0	104.0	125.0	114.0	113.0	107.0	80.0	70.0	54.0
MIN:	34.0	44.0	33.0	50.0	46.0	50.0	72.0	71.0	54.0	35.0	40.0	35.0

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Table 1. The Above Matrix Shows Ozone Levels Exceeding 70 parts per billion Federal Standard in Areas that include Riverside County - from the Air Quality and Meteorological Information System (AQMIS)



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**Figure 2.** Screenshot of the City of Moreno Valley from the CA EPA CalEnviroScreen tool, as updated in June 2018. High percentages (Red/Orange/Light Brown/Maroon colors) indicate higher pollution burden and vulnerability as compared to other cities in the State.

**Moreno Valley** - The CA Environmental Protection Agency (EPA), with its CalEnviroScreen tool, evaluates scientifically the various ways many communities in California are burdened by environmental problems and pollution. The CA EPA has determined that the residents of Moreno Valley are already experiencing ozone at rates higher than 97% of the State, and PM2.5 at rates higher than 92% of the State. Diesel particulate matter are experienced at rates higher than 33-80% of the State, depending as to whether you are on the west side and/or close to the freeways, were the rates are already high (close to 50-80%).

Based on the above scientific determinations by the AQMIS and the CA Environmental Protection Agency of ozone, PM2.5 and diesel particulate matter levels of burden, it is clearly shown that Moreno Valley residents are already being exposed to air contaminants that contribute to asthma, lung cancer, high blood pressure and cardiovascular disease (heart attacks and strokes).

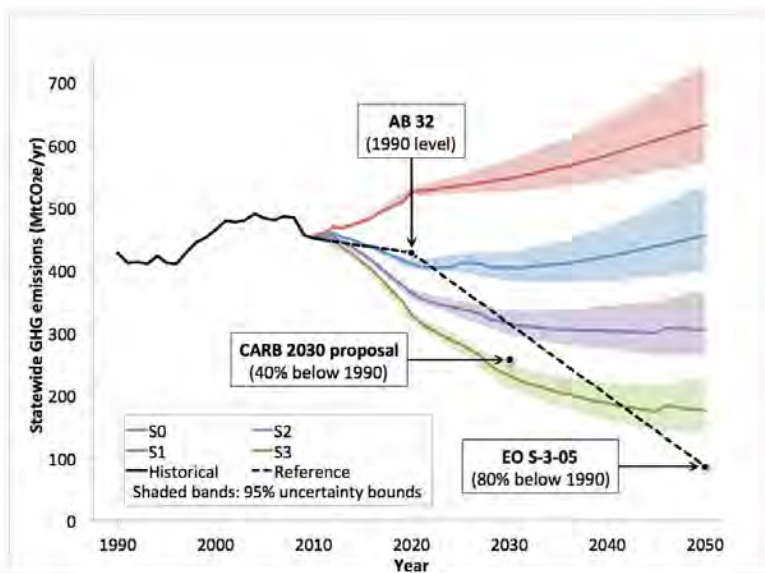
**President Biden GHG and Climate Change Proposals** – In April 2021, the White House committed to:

- Reducing GHG emissions 50-52% below 2005 levels by 2030,
- Power the nation with 100% renewable energy (carbon free energy sources) by 2035,
- Funding 500,000 vehicle-charging stations by 2030,

- Creating well-paid union jobs to mitigate Climate Change by making infrastructure more resilient, improving air and water quality, and innovating in American technology.
- Integrate all levels of government (municipal, county and state) and community leaders (religious, cultural, health) to confront together the existential threat of Climate Change.

These are tall commitments that need to be taken into consideration as plans are laid out for the future of the City of Moreno Valley.

California Efforts on Climate Change – California, consistent with its leadership in addressing world and human challenges, has recognized the threat of climate change and has taken action for several decades now.



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Figure 3. Legislation and Policy Steps Taken by the State of California to Mitigate GHG Emissions

To reduce the potentially catastrophic effects of climate change, California has recognized the science and understands that we must dramatically reduce our annual statewide GHG emissions, and has taken steps to accomplish this objective.

- Assembly Bill (AB) 32 requires CA to reduce its total statewide GHG emissions to 1990 levels by 2020.
- Senate Bill (SB) 32 requires CA to reduce its total statewide GHG emissions 40% below 1990 levels by 2030.
- Further, the Governor's Executive Order (EO) S-3-5 directs state agencies to reduce statewide GHG emissions to 80% below 1990 levels by 2050.

To achieve these ambitious but necessary goals, the State of California will have to reduce GHG emissions from various sectors of the economy.



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Figure 4. California GHG Emissions by Sector (Percentage of Carbon Dioxide Equivalent) – from the California Energy Commission Using Data from the California Air Resources Board

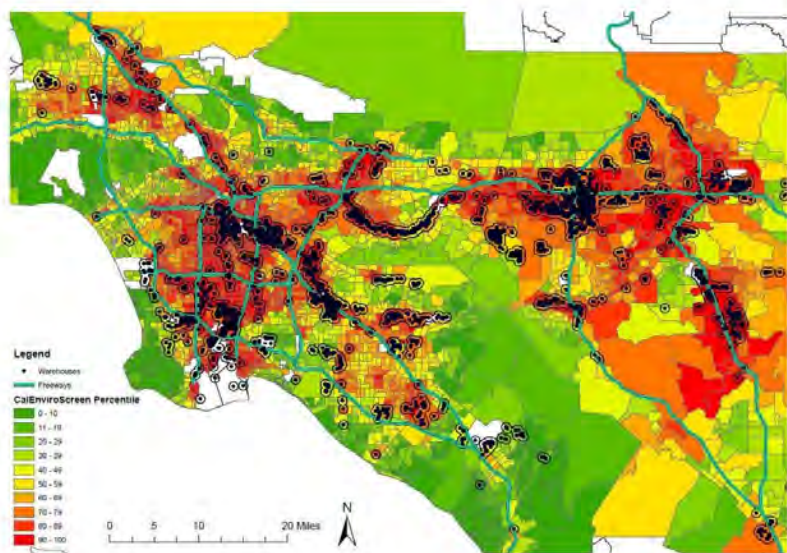
As shown on above figure, the Transportation and Industrial (including electricity generation) sectors are the top contributors to the State's total GHG emissions.

In April 2021, the California Governor Newsom used his gubernatorial power to order no new state fracking permits to be issued starting 2024. He also ordered the California Air Resources Board (CARB) to plan for the phase out of oil extraction no later than 2045, which is consistent with former Governor Brown's 2018 order requiring the California Air Resources Board (CARB) to reach carbon neutrality by 2045 (requiring any remaining emissions be offset by equivalent net removals of carbon dioxide (CO<sub>2</sub>) from the atmosphere, including through sequestration in forests, soils and other natural landscapes).

In May 2021, the South Coast Air Quality Management District (SCAQMD) approved the Warehouse Indirect Source Rule (PR 2305) which requires warehouses, and indirectly diesel-fueled trucks serving them, to cut chronic air pollution linked to asthma, cancer and deaths in Los Angeles, Orange, Riverside and San Bernardino counties. If the district does not comply with federal standards, costs will be greater than those associated with the rule. The rule will

phase-in mainly between 2022-2024, and will impact warehouses greater than 100,000 square feet. The rule sets up a system where warehouses can choose from: acquiring zero-emissions or near-zero-emissions trucks, installing charging infrastructure, solar panels, and/or filter systems in schools, hospitals, community centers, and other locations. Warehouses could also pay a mitigation fee to fund air quality improvements in communities affected.

The district report on the rule confirms what we already know, diesel exhaust from trucks aggravates allergies and lead to breathing and heart problems, and cancer. The report further confirms that neighborhoods close to warehouses already face substantially higher burdens than other neighborhoods, including higher rates of asthma and heart attack, and most such affected communities have higher poverty rates, with Hispanics and African Americans being the majority in population.



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Figure 5. Current Environmental Burden on Communities near PR 2305 Applicable Warehouses as Demonstrated by CalEnviroScreen's Percentile 80<sup>th</sup> Analysis

Above figure shows that South Coast AQMD communities (including Moreno Valley) currently living close to (greater than 100,000 square feet) warehouses rank within the 80<sup>th</sup> percentile (orange/red) of pollution. The ranking process es based on pollution burden, the higher the score (out of 100%) means they experience a higher burden. This again confirms that Moreno

Valley and many other communities are already experiencing the highest localized pollution burdens.

During the public comments for the South Coast AQMD meeting, a member of the public stated: "It does not matter what the economic benefits are if no one's around to spend it".

II. MODIFICATIONS ARE NECESSARY TO THE MORENO VALLEY CLIMATE ACTION PLAN TO BE CONSISTENT WITH FEDERAL AND STATE COMMITMENTS AND PROJECTIONS TO MITIGATE THE EXISTENTIAL THREAT OF CLIMATE CHANGE

13 cont.

As noted above, President Biden has committed to lower the country's GHG emissions by 50-52% below 2005 levels by 2030, and the State of CA intends to lower the State's emissions by 40% below 1990 levels and by 2030, and 80% below 1990 levels by 2050 (Figure 3), along with a current (and previous) Governor's overarching goal to reach carbon neutrality in the State by 2045.

All municipalities and counties in the State are part of these national and state GHG mitigation efforts, and by properly decreasing cumulative GHG impacts of existing and proposed projects, there will come to fruition real, measurable improvements to the health and quality of life in CA, and the City of Moreno Valley inhabitants in particular.

**A. Modifications Required to the Current Proposed MV CAP:** The City of Moreno Valley has the authority and ethical imperative of requiring any proposed project to mitigate its emissions on a downward trajectory throughout the life of the project, and reaching net-zero emissions at a time certain to protect the well-being and quality of life of the Moreno Valley residents. By taking this bold and necessary action, the City leaders will protect the environment and well-being of the people in Moreno Valley, and will implement emission mitigation approaches consistent with those requested from the United Nations Intergovernmental Panel on Climate Change, and federal and state governments.

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14 Refer to response to Comment 3 above.

The MV CAP "Mitigated" as Currently Proposed has the following emission baseline and trajectory estimates: Baseline 100% (866, 410 units) in 2018, and 105.4% (913, 365 units) by 2040 (an actual increase of about 5.4% in total emissions). Trajectory was extended to year 2045 to compare with the new MV CAP. (See Figure 6 below).

A new MV CAP to Mitigate GHG needs to be developed that is generally consistent with the downward GHG trajectory as proposed by federal and state commitments, with an overarching goal of carbon neutral by 2045: Baseline 100% (866, 410 units) in 2018, 40% below 2018 (519,846 units) by 2030, 52% below 2018 (415, 876 units) by 2040, and 100 below 2018 by 2045. (See Figure 6 below for comparisons).





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Each and every project that is submitted to the City needs to be reviewed and required to mitigate GHG emissions with a downward trajectory as determined with the new MV CAP Required to Mitigate GHG (new MV CAP), so that additional cumulative GHG effects do not continue to contribute to the already existent respiratory ailments, cardiovascular disease, and early death of the residents of the City, and that have had a disproportionate impacts on vulnerable populations such as children, the poor, the elderly, individuals with existing health conditions, and communities of color.

This transition will not only be implemented to protect the health and well-being of all the residents and the surrounding environment of the City, but jobs will be created in the areas of energy efficiency, renewable energy, electric vehicles and its charging infrastructure, electrification of homes that change from natural gas to electricity, and their components, and other advanced technological solutions that may be developed in the future and that are consistent with or better than the state's goals. Training of workers in the fossil and related industries needs to get started now, to be part of this transformation in a timely manner.

**B. Important Matters to be Addressed by Future Projects:** Key questions that need to be addressed by new projects in the area of Moreno Valley are as follows:

- How will the mobile and stationary emission sources being proposed will impact the State's and Moreno Valley GHG targets (e.g. Baseline 100% in 2018, 40% below 2018 by 2030, 52% below 2018 by 2040, and 100% below 2018 by 2045)?
- How will the mobile and stationary emission sources being proposed will impact the already unhealthful air found in the area of MV, the current and future MV residents - including those already most vulnerable (young and adult asthmatic, and adults with chronic respiratory illnesses)?
- How will the project impact environmental surroundings, including parks, protected areas, and protected species? Does the project need to seek approval of any plans

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15 Future projects proposed within the City will be required to undergo a site specific environmental analysis that considers air quality impacts. This would include an analysis of consistency with the goals, policies, and recommendations of the 2021 GPU, as well as the evaluation of future development projects air quality impacts using SCAQMD guidelines, regional emissions thresholds, and localized significance thresholds (LSTs). The comment does not raise issues regarding the adequacy of an EIR.

16 Impacts related to biological resources are addressed in Section 4.4 of the EIR. Adoption of the proposed plans does not require approval from state or federal regulatory agencies; however, future projects implemented under the General Plan may require State or Federal agency approvals depending on the resources identified during subsequent environmental review. The comment does not raise issues regarding the adequacy of an EIR.

developed to protect plants and species from appropriate state and federal regulatory agencies?

**C. Use of Offsets and/or Carbon Credits Should be Limited and as a Last Resort (less than 5% of required GHG mitigation by project):** Every project proposal that mitigates GHG emissions by using offsets and/or carbon credits should limit its use to no more than 5% or less, as these offsets do not necessarily benefit the area of Moreno Valley directly.

It is important to recall that "CARB recommends that lead agencies prioritize on-site design features that reduce emissions, especially from [vehicle miles traveled], and direct investments in GHG reductions within the project's region that contribute potential air quality, health and economic co-benefits locally". Therefore, every project must be required to first fully consider and implement direct reductions before it purchases offsets and/or carbon credits.

**D. GHG Mitigation Methods and Investments, and Jobs Created:** Every project needs to consider and include the following mitigation approaches being pursued by federal and state governments, as the most effective ways to fight climate change at the national, state and local levels:

- Energy efficiency,
- Decarbonization and electrification of mobile and stationary sources (e.g. acquiring zero-emissions or near-zero-emissions trucks and installing charging infrastructure; changing homes and buildings from natural gas to electricity),
- Smart City growth,
- Renewable energy (e.g. extensive use of solar panels, biofuels, other renewable resources),
- Hydrogen derived from renewable energy,
- Installing filter systems in schools, hospitals, community centers, and other locations, and
- Other advanced technological solutions that may be developed in the future and that are consistent with or better than the state's goals.

As noted above, these methods and investments should be required to be on-site improvements with appropriate monitoring mechanisms, while offsets and carbon credits should be used as a minimum and last resort (and <5% of total use).

Figure 5 below shows how these different methods and investments are projected and recommended by the State to be used by all municipalities and counties to effectively mitigate their GHG footprint. It also shows the resolve of the State to decrease emissions to very low levels by the decade 2040-2050, generally consistent with the United Nations Intergovernmental Panel on Climate Change (Figure 1).

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17 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

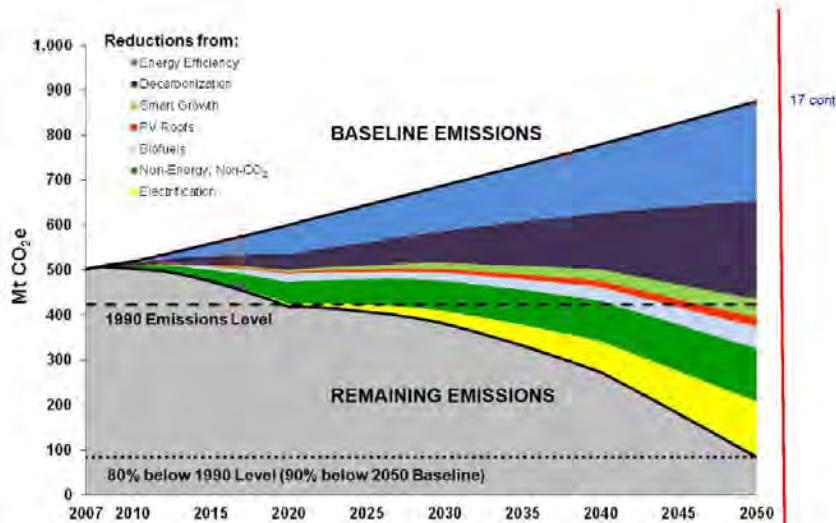


Figure 5. State of California Recommended Methods and Investments to Decrease a City GHG Footprint.

Also, as noted above, these methods and investments will bring jobs to the City of Moreno Valley, and the training of workers in the fossil industry and related areas needs to get started now, to timely effect this transformation.

**E. Projects Modeling and Monitoring:** These targets will be as good as they are enforced. Any proposed project with a GHG footprint will need to be modeled as accurate as possible to determine its impact to the goals stated by City policy. Developers should be required to make necessary corrections/improvements to their plans to keep the City within the GHG emission levels and goals.

Further, the City leaders should provide updates to the public on an annual basis on how it is doing to reach its GHG goals, and actions taken for any corrections.

III. THE MORENO VALLEY UTILITY INTEGRATED RESOURCE PLAN AND CLEAN ENERGY GOALS NEED TO BE COORDINATED WITH THE MODIFIED MV CAP, AND FEDERAL AND STATE COMMITMENTS AND PROJECTIONS

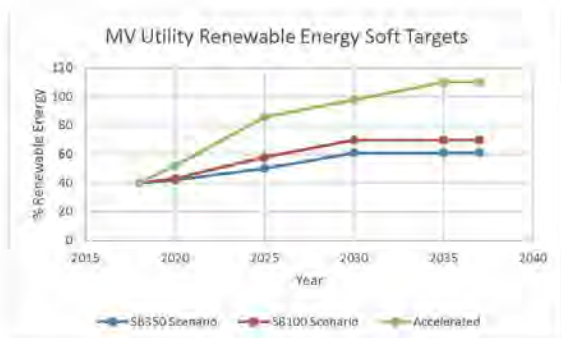
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Figure 6. California's Clean Energy Goals – Past and Future

Ensuring access to affordable, reliable, sustainable and state-of-the-art energy for all is a key goal for an enhanced quality of life and well-being of the Moreno Valley residents. Further, the MV Utility will play a key role in mitigating GHG emissions by using renewable energy to power the City.

Figure 6 above shows the State of California's goals to achieve 50% renewable resources by 2030 (SB 350) and 100% by 2045 (SB100). Furthermore, as noted above, President Biden has committed the nation to reach 100% of renewable energy (carbon free energy sources) by 2035.



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Figure 7. MV Utility Renewable Energy “Soft” Targets (with Procurement Margin) to Reach 100% for Various Scenarios

As the State and cities are moving towards becoming carbon neutral in the future, the Moreno Valley Utility (MVU) is working towards 100% clean energy under various scenarios, as shown on the 2018 Integrated Resource Plan (IRP) (Figure 7 above). The MVU 2018 IRP clearly shows the possibility of the City to reach 100% of renewable energy by 2030, using an accelerated scenario.

As the Moreno Valley Utility updates its IRP to achieve its 100% renewable energy goal, it will be important that it considers the transitional characteristics that the demand will be undergoing through the next 20 years, which will include by 2040 (cases with different assumptions will have to be modelled as sensitivities):

- Extensive use of solar panels for residential, commercial and industrial use, within the confines of system reliability,
- Potential use of utility solar/wind energy and storage,
- Increased use of interruptible load,
- Higher than 50% of passenger cars on the road within the City are plug-in electric by 2040,
- Higher than 50% of residents have access to residential charging, and 40% access to workplace charging to encourage more daytime charging by 2040,
- Appliances and heating equipment within existing and new buildings that switch from natural gas to electric,
- Reduce energy consumption by 15% compared to 2020 by 2030, and by 30% compared to 2020 by 2040,
- Assume other potential advanced technology solutions that may be available within the study horizon that assist in reaching the MVU clean energy goals.

As suggested above, the City needs to start investigating the feasibility of building its own energy resource(s), based on solar, wind, batteries and other advanced clean technology, to energize the City 100% by 2030, or earlier. Any excess energy could be sold to the market for City revenue, and to pay for these investments. The current prices and state of technology make this investigation appropriate and highly feasible at this time.

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Monitoring the advancement of technology and costs on an annual basis to accelerate above goals will be very important.

Clearly, electrification (decarbonization) of vehicles, industry and buildings (which are the top contributors to the State's total GHG emissions - see Figure 4), and the use of renewable energy and other advanced technology consistent with the city's clean energy goals will bring extensive improvements in air quality and health across all areas in the city, both to disadvantaged and non-disadvantaged. Furthermore, as the City transitions to a 100% renewable energy, many jobs could be created as described in Sections II and V.

IV. ENVIRONMENTAL JUSTICE AND PROJECT APPROVAL PROCESS ISSUE CONCERNS

As we know it, environmental justice covers fairness in the distribution of environmental benefits and burdens, it also entails the ability of people to be involved in the decision-making process around projects that will impact them, and a recognition of the role of historical events that have placed certain sectors of our society in marginalized status.

Before the current pandemic, the City had already been experiencing high rates of statewide poverty and unemployment, and inability to reach home ownership due to out-of-reach Real Estate prices. Furthermore, the socioeconomic situation of the poor residents in Moreno Valley affects their ability to deal with the pollution burden they already experience.

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Environmental justice requires that a modified MV CAP be implemented to mitigate GHG emissions, with trajectories consistent with the President commitment and the overarching policies of the State of CA. By taking this bold and necessary action, the City leaders will provide relief to neighborhoods already suffering from substantially higher burdens of pollution, communities that generally have higher poverty rates, and with Hispanics and African Americans as residents.

Concurrently, governmental regulations require that jurisdictions "with disadvantaged communities" identify policies that reduce the "compounded health risks" and that include (amongst other things) "reduction of pollution exposure, including the improvement of air quality ...". Thus, every project that is to be approved by the City needs to be provided to all residents with the following

1. With full information and sufficient time for review. There have been instances when a project is modified, with not enough time given to perform a fair review, with no explanations on what the changes were and the reasons for the changes, and to top it all, creating additional inconsistencies and illegal issues as related to previous versions of the project.

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18 Issues of environmental justice are addressed within the proposed Environmental Justice Element of the General Plan. Materials were provided in Spanish were feasible. The comment does not raise issues regarding the adequacy of an EIR.

- 2. With GHG mitigating measures that are local, measurable, verifiable, and real, with the impact of improving the quality of life and well-being of all.
- 3. The City should provide responses to all comments provided; comments may be aggregated if similar.
- 4. When a project is several hundreds of pages or more, the residents should be given briefing documents (20 pages or less) that summarizes the project, explains changes that have occurred since last update, and how previous comments provided were handled. These documents should be printed in English and Spanish (according to the US Census Bureau, 58% of residents are Hispanic) and any other language that the City deems appropriate, and City staff must be available by phone or in person to answer questions in Spanish.

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Not addressing these matters is inconsistent with the vision and core values of the City, which envision our City to: fully promote democracy and invite citizen involvement on matters that may impact their way of life, be a safekeeper of a healthy and self-sustaining environment, and protect the health and well-being of current and future generations. Doing otherwise would be making a mockery of our democratic process.

V. JOBS CREATION

A. As we move forward to fight Climate Change and become part of the extraordinary change in working environment that is taking place now and for years to come, it will be important for the City to balance and emphasize the jobs of the future that mainly fall in the categories of healthcare, robotics, medical equipment, electric vehicles and renewable energy and components, logistics, energy efficiency, electrification of homes that change from natural gas to electricity, semiconductor industry, and other advanced technological solutions that may be developed in the future.

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This diversification, along with being well-paid jobs, will bring a strong revenue stream to the City, and support an optimum quality of life for residents. Focusing on a few jobs that may only automatize the activities of individuals will make life difficult for such workers, and decimate the future of the City.

It is also time now to start preparing the Moreno Valley workforce for this transition.

B. Continue to promote hiring locally. This is a great program that brings benefits directly to the City. Furthermore, the new Moreno Valley Business & Employment Center (BERC) is a good hub for businesses, local employers, and residents to connect for jobs and opportunities.

C. Years ago there used to be annual AYSO regional soccer tournaments (this is just one example) in Moreno Valley that would bring people and business to the City's restaurants and hotels for a weekend or two. It would also bring people awareness of the City and its services and beauty. Why are we not doing more of this, for this and other sports and cultural events?

D. The City needs to bring businesses that contribute to the residents' health and well-being. I still need to go to Riverside to find a good, and fully stocked health food store (we have been without one for several years now), and also for a health food supermarket. Additionally,

19 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

LETTER

RESPONSE

services that focus solely on self-improvement and health (e.g. yoga, meditation, etc.) are sorely needed and need to be encouraged to come.

VI. TREES, TREES, TREES

Trees provide environmental benefits that directly improve human health and our quality of life. Trees clean GHG and lung-damaging chemicals while cooling the City, by:

- \* Absorbing gas pollutants (e.g. O<sub>3</sub>, nitrogen oxides [NO<sub>x</sub>], and sulfur dioxide [SO<sub>2</sub>])
- \* Capturing particulate matter on their surfaces (e.g. dust, ash, pollen, and smoke)
- \* Freshening the air we breathe by releasing oxygen as a byproduct of photosynthesis
- \* Transpiring water and shading building surfaces and street pavement, which lowers local air temperatures, thus reducing ozone levels.
- \* Cooling urban heat islands they can reduce ozone formation.
- \* Directly sequestering CO<sub>2</sub> as woody and foliar biomass as they grow.
- \* Reducing the demand for heating and air conditioning units, thereby reducing emissions from electric power generation.

Trees also:

- Increase property values,
- Slow water runoff and prevent soil erosion,
- Help buffer noise pollution and cool our homes, streets, and cities
- Can save you money on energy costs, and
- Just simply, they are beautiful.

These benefits obviously depend on tree species, size, health, and location. Due to these proven benefits, the General Plan needs to include the following action items:

- A three-year project should be started now to plant trees along Perris Blvd, Heacock St, Sunnymead Blvd, Cottonwood Ave., Allesandro Blvd., Cactus Ave. John F. Kennedy Dr., and other projects should be planned for other streets once this is completed.
- Offsetting GHG can be substantially increased by ensuring that tree planting, care, and preservation are part of the General Plan, and should be fully supported and financed.
- Parking lot tree planting should also be part of the City strategy to improve current air quality. For example, there should be a parking lot ordinance specifying a certain amount of planted area per space, and without allowing clustering in islands.

Trees are an effective and beautiful way to fight our existential threat: Global Warming.

VII. BUILD CITIES FOR PEOPLE, NOT CARS

Bicycles will be one of the keys to fight Climate Change and Air Quality issues in the future, and thus, able to provide a healthier lifestyle. If the City of Moreno Valley makes it easier for people to walk, bike and take the bus, fewer GHG and lung-damaging chemicals will be emitted by oil-burning transportation.

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20 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

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21 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.



Frankly, sometimes it is scary to bike due to the behavior of car and truck drivers, they blow their horns onto you, tail you or pass you very closely without caring ... it is a risk every time one bikes, it does not have to be this way.

The City needs to at least triple existing bike lanes within the next 5 years (and at the end start a new cycle of construction for a new area), and provide riders with truly protected curb-level bike lanes to the greatest extent possible, like in Copenhagen; further, it is important the City educates the public that bicycle riders should be respected and provided the right of way when in doubt.

It is but logical that if Moreno Valley had a good and strong network of protected bike lanes, more people would use them.

VIII. SENIORS

According to State projections in 2017, by 2030 around 9 million Californians will be over the age of 65, around 3 million more than there are today (6 million). Within a decade, more than 20% of the state's residents will be seniors. While California's working-age population is projected to grow by about 6% by the mid-2030s, California's 65-plus population will grow by more than 65%.

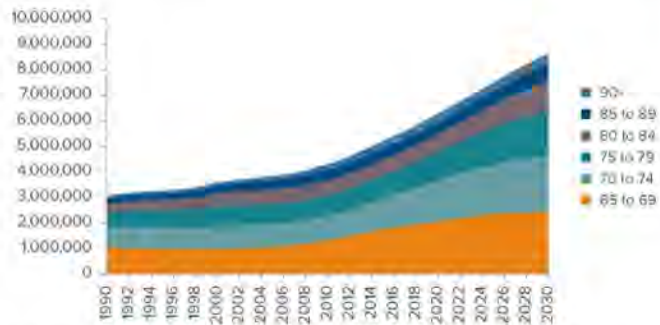


Figure 7. California's Growth Projections (and Past) for People over 65 of Age

The figure above shows how approximately the different senior-age ranges have grown through the years, and how they are expected to grow by 2030.

The over-65 population will become much more racially and ethnically diverse, with the fastest growing population being the Hispanic population (2017-2030): approximately 106% growth.

22 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

Finally, the current State senior population could possibly double in the next two decades, and will also become more racially and ethnically diverse, signaling a growing need for culturally competent services, and a significant impact on senior support services provided by the City.

The General Plan needs to include and pursue the following actions:

1. The City should start pursuing plans for budgeting to construct a new Senior Center to accommodate the projected increase of senior population in the State, as Moreno Valley will certainly be impacted. Note that this projection only mentions population over 65, and our Senior center provides services for people over 50, and disabled individuals. This new Senior Center should be constructed within the next five years, with current and future bilingual personnel, and with room to grow to accommodate for the next decade, as senior population may increase by 50%, as noted above.
2. The City needs to continue working closely with the State to receive the needed additional resources to meet the demand that will be required from this increase in senior service requirements.
3. The City needs to support incoming health-related businesses in the area, including nursing care facilities and health care professionals, as may be needed in the future.
4. The City leaders should work closely with county, state and federal officials to facilitate at the Senior Center programs that directly assist older people feelings of depression and loneliness.

IX. CITY SHOULD PLAY A STRONGER ROLE IN HELPING WITH THE HEALTH AND FUTURE OF LOW-INCOME CHILDREN, AND RETHINK LIBRARY USE TO HELP MORE WITH OVERALL EDUCATION OF CHILDREN

Impact of Poverty on Children – Within the last 15 years, researchers have found correlational proof that poverty affects children via their brains, including the areas of language and impulse control (surface area of brain's outer layer is smaller) and learning and memory (hippocampus volume is smaller). According to this latest research, these differences are not inborn or inherited traits, but rather due to the circumstances in which children grew up in.

As poverty brings malnutrition, higher stress levels, and lower-quality education, researchers have found that these aspects of living directly influence children's cognitive development, via their brains.

Additional research confirms that the emotional health and development of young children begins early in life, and in fact, prolonged emotional distress (such as found in poverty and/or troubled homes) may impact the child's well-being later in life, including the child's ability to avoid addictions, have good social and work relationships with others, and be a contributing member of the community.

Some cities have been conducting pilot programs to help single mothers with newborns and young children living in poverty with a monthly stipend for a few years, and monitoring whether this aid helps in the healthy development of their children, by comparing with others not receiving the help. Results have been encouraging.

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23 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

Based on the above scientific facts and the potential for helping underprivileged children, the City should initiate a pilot project to help single mothers with young children with a monthly stipend (\$100-300 for 5 years), and expand the project if it is successful.

Improving Educational Approach and the Role of Libraries– Research has found that there is a correlation between lower quality education and lower brain and cognitive development.

As we are recovering from the pandemic, we need to reformulate how we are using our libraries. They should be a place with tools that create in all children passion, curiosity, imagination, and persistence while learning through hands-on exercises and outside trips. Technology now allows libraries to have project-based learning with exercises that will expand the ability of children and young minds to collaborate with each other, learn critical thinking skills, and understand each other cultural differences and commonality, abilities that are required for survival 21<sup>st</sup> century.

23 cont.

Therefore, the City should create spaces and tools in our libraries where kids can perform these activities, with the assistance of staff, or in coordination with local schools. Libraries can also offer workshops and short area trips for all children in Moreno Valley so they can learn about nature, the environment, climate, science and urban development.

Through hands-on projects and field trips, libraries can complement education of children and young people to allow them to take ownership of a sustainable way of life, and to develop themselves into contributing members of society.

X. HOUSING CRISIS AND SOLUTIONS FOR YOUNG FAMILIES

The City needs to take stronger steps to provide more assistance for young families to obtain a home. The current situation and prices do not allow young people to establish this American dream, and to shelter their families for life.

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- A. Information and Workshops - Provide booklets (and other information) and conduct workshops to inform first-time buyers with young families of available assistance and programs that may allow them to obtain a home (e.g. County of Riverside Economic Development Agency, Home Buyers Clubs, others).
- B. Establish Policies that Lower Costs of Housing – The City should establish policies and support existing and new local laws that require developers to build a higher percentage of affordable housing devoted to first-time buyers with young families.
- C. Be Creative – The City needs to be creative and use state and federal government aid to establish funding and loan programs to assists new families on this extreme crisis, and keep informing them on an-ongoing basis.

24 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

XI. COMMUNITY CHARACTER - INCREASE AWARENESS AND PRIDE OF THE CITY BY CREATING HARMONY AND UNITY AROUND IT

There are various inexpensive ways to create initiatives to improve the relationship of the Moreno Valley residents and the City, and its image. The General Plan needs to include the following actions:

1. Establish City websites that give the following information to residents and visitors:
  - a. "Best things to do in Moreno Valley this week" (Events),
  - b. "Best places to go in MV as voted by its citizens" (food, cultural sites, trails, etc.),
  - c. This information should be updated on an annual basis.
2. Place a marker at the entrance of all MV trails, with a placard describing the name of the trail, any historical significance to the area/City, and flora and fauna that may be found in the area.
3. Establish a historical website where different buildings/locations of the City are depicted and with a click of a building, you get the picture and a brief historical description of the place (e.g. where the former raceway in MV was, where original indigenous people lived). There should also be a physical placard on any location that may have the historical significance to the City.
4. A mobile City Hall, where services are provided to the residents. "You do not need to come to City Hall – City Hall comes to you". The key will be to make sure residents get a definite benefit out of it (e.g. reporting city maintenance issues, crime, homelessness, information on how to get permits and even getting those permits on the spot, etc.)
5. The Mayor and all City Council members should provide the citizens with an opportunity to meet, "for coffee", "at the park" or wherever. These meetings are extremely useful and make residents feel part of the City, and enable them to resolve their issues without having to go to City Hall. A sense of belonging!
6. In addition, with all the digital platforms that are used to provide information to residents, it is very important that the City also uses low-tech technology (banners, big letter announcements) on the streets, fences and public places (libraries, City Hall, Senior Center, etc.). People (20-40 years old) are generally too busy to handle all information on technology, but they drive around and are able to see signs on the road; further, people over 50 generally have the time to go to public places. Previous events and information that would have benefited from this low-tech approach:
  - a) First Moreno Valley Film Festival (I was the only one who attended, along with the organizers at the Harkins theater some years ago – it was a fabulous experience!);
  - b) This General Plan Update – very few people know about it;
  - c) Moreno Valley Utility – this is a great utility, winner of several prizes and with a great management team; very few people know about it; we need to "blow our horn" in newspapers and other platforms more frequently on this one!

This approach is currently used in several cities and works effectively: Los Angeles (museums banners on the streets), Palm Springs (foreign film festival banners across streets), etc. It is successfully used here in MV for high GPA students.

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25 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

LETTER

RESPONSE

XII. GOALS AND ACTIONS – CREATING RESPONSIBILITY AND ACCOUNTABILITY

Every goal and action stated in the General Plan, Housing Element, EIR and Climate Action Plan needs to have a:

- Clear and short description of the item.
- Department/Group responsible,
- Measurable action, and
- Due date.

This will assign responsibility, accountability, transparency, and clarity of goal and action. Updates should be provided to the public at least every two years to gauge progress, and to correct direction as may be necessary.

26

26 Comment noted. The comment does not raise issues regarding the adequacy of an EIR.

LETTER

RESPONSE

Letter I-2

**From:** [Lynne Ashley](#)  
**To:** [Chris Ormsby](#)  
**Subject:** Sterling Ranch  
**Date:** Tuesday, May 4, 2021 4:53:46 PM

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Warning: External Email – Watch for Email Red Flags!

I am just sending in my email to oppose the changes to Sterling ranch... It is ridiculous! that is the only area with large lots in Moreno Valley! (With very few exceptions)... You cannot put 10 houses per acre near our beautiful homes, and change it all to commercial area, business offices, and warehouses please please I implore you to deny this change.

Lynne Ashley  
Deep Valley Trail  
Sent from my iPhone

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City's RHNA allocation in accordance with State Housing laws.

LETTER

RESPONSE

Letter I-3

From: concepcion.barrionuevo@concepcionbarrionuevo.com
To: Chris Ornelas
Subject: 2021 General Plan, Draft EIR, and Climate Action Plan
Date: Monday, May 17, 2021 4:19:28 PM

Warning: External Email - Watch for Email Red Flags!

I Concepcion Barrionuevo am a resident of Moreno valley in the Northeast Sterling Ranch homes of Deep Valley Trail/ Cloverdale Moreno Valley, CA.

I would like to make known my official objection statement to the 2021 General Plan, Draft EIR, and Climate Action Plan. These proposed new general plan land use changes I fully oppose and demand that the zoning changes proposed be rejected totally from this or any other non-citizen generated changes in this quadrant of the city I am a resident of and that I would like the current 2006 General Land Use Map to be retained/ kept for this area.

For loss or diminish of property value there also are some legal theories that can be asserted like spot zoning. Illegal spot zoning typically applies when land use zoning is applied only to a specific parcel and not a general geographic area that can be a stance to sustain a civil lawsuit against the city.

I would like my questions to be addressed by all appropriate parties as they are followed in this email

Our sleep and quality of life have been severely negatively impacted by the paper company and the city has not helped. What will be different if you add more commercial to our area? Arbitrary numbers on paper are not real life comparisons so how will this be displayed and discusses with us residents and citizens of Moreno Valley?

How will Sterling ranch residents and surrounding areas be impacted by users of the mixed use/ commercial areas? And how will us residents of Moren valley be protected from these such intrusions on quality of life?

Since under California State Law it prohibits any developers or parties from building or developing on a fault zone/ earthquake fault zones without a professional and accredited state approved geologist to investigate and map faults to set safety zones of 500 feet on either side of any development how is the city officials attempting to implement a NE General Plan for Moreno valley plan which zones for large commercial plots on the most active fault in Southern California the San Jacinto Fault zone apart of the San Andreas Fault system?

How are the city of Moreno Valley officials providing a NE general 2021 plan that is illegal plot zoning which eliminates prominent categories of residential housing and in legal theory causes loss and or diminish of property homes that can be asserted and stance to sustain a civil lawsuit by residents against the city and environmental organizations or federal wildlife protection agencies?

Our areas are earmarked for executive housing and animal keeping (large lots) in 2006 general plan proposal, the current proposal for 2021 does not mention either. What happened to those designations as both are critically important for diversity of housing?

Why has the city officials refused to and not hosted a meeting open to the public to establish the city's goals and objectives for future group and implemented or encouraged all public comments and perspective input in changes that directly impact quality of life of residents of Moreno Valley?

In the 2021 General plan have you addressed the severe quality of help effects and impact and environmental impact on wildlife in a crime free area of the city in companson to other sections?

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- 1 Introductory comment. See responses to specific comments below.
2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City's RHNA allocation in accordance with State Housing laws.
3 See responses to specific comments below.
4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
5 Section 4.7.5.1.a of the Draft EIR states the following:
Title 8, Chapter 8.21 Grading Regulations of the Municipal Code specifies that a geotechnical report is required for all grading projects, and a preliminary soil report, preliminary engineering geology report, and/or seismicity report may be required depending on site specific conditions.
Additionally, 2021 GPU Safety Element includes the following policy that was presented in Section 4.7.5.1.a of the Draft EIR:
S.1-1 Continue to restrict the development of habitable structures within Alquist-Priolo Earthquake Fault Zones consistent with state law.
Therefore, future projects proposed within the San Jacinto Fault Zone would require geotechnical investigations to determine the seismic site characteristics and appropriate safety measures, and habitable structures would be restricted within Alquist-Priolo Earthquake Fault Zones consistent with state law.
6 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
7 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

	<p>8 As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initial outreach included stakeholder interviews, six ‘pop-up’ outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members (Draft EIR page 2-9). The City formed the General Plan Advisory Committee (GPAC), as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU. Additional community-wide surveys and multiple public meetings were held between December 2019 and May 2020, with close to 1,000 community members participating in the 2021 GPU process. This comment does not suggest an inadequacy in the analysis of the Draft EIR.</p> <p>9 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Impacts associated with biological resources are presented in Section 4.4 Biological Resources of the Draft EIR. Impacts associated with police protection are presented in Section 4.15 Public Services and Recreation.</p>
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LETTER

RESPONSE

Why does the Mayor of Moreno Valley refuse to appoint NE residents of the city in the update committee for this critically impactful proposed plan while appointing his donors, supporters, and developers which is a conflict of interest in legal terms ?

The politicians and city officials that stand for Moreno Valley I have never seen promote anything for the greater of the community and only for self-gain. Why not instead host holiday or fall festivals, city country clubs for resident uses, equestrian centers to volunteer or interact with wildlife, sports parks, walking trails and routes, community parks or gardens, or other events in our city area of Moreno Valley, as well as protection for the beautiful wildlife (Donkeys which is something you shouldn't take for granted because it ceases to exist in most cities).

Why not make this city somewhere where people would enjoy the journey of witnessing do you only see the future of it as industrialized without hearing residents thoughts and considerations or perspectives. There is not a decrease in employment rates. You are supposed to look into the best interests of your constituents. There is value in the quality of life for people who live amongst you in this city.

There is value in the quality of life for people who like amongst you. I was fascinated when I first arrive to this city to see the beautiful wildlife that is something you shouldn't take for granted because it ceases to exist in most cities. These changes would effect all parts of the community who have health issues and our families ?

Concepcion Barrionuevo  
Phone (909)566-9278

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10 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

11 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Impacts associated with biological resources are presented in Section 4.4 Biological Resources of the Draft EIR.

LETTER

RESPONSE

Letter I-4

From: Barbara Baxter  
To: Chris Ormsby  
Subject: General Plan Update  
Date: Monday, May 17, 2021 4:59:26 PM

Warning: External Email – Watch for Email Red Flags!

Dear Mr. Ormsby, council staff and planning commission,

My husband Don Baxter and I are writing to voice our opposition to the proposed general plan update and draft EIR and ask that this document be entered into the public record (and actually read by staff, planning commission and staff). CEQA identified two alternatives that protect the NE end of Moreno Valley, 6.4 Reduced Growth Alternative and 6.5 Redistributed Growth Alternative which has been identified as 6.6 Environmentally Superior Alternative. Both of these alternatives retain our 2006 general plan land uses in the NB and are the appropriate actions.

The city has repeatedly been unwilling/unable to protect residents from significant negative impacts related to but not limited to noise, truck traffic, pollution, and crime created by unethical and improper rezoning. We can't trust the city to protect the NE area therefore we respectfully request that the CEQA alternatives be adapted. There needs to be a balance between the more urban and rural lifestyle to maintain city growth, and options for potential residents. Our health and quality of life need to override developers profit.

Thank you,  
Don Baxter, Retired USAF  
Barbara Baxter, Former USAF

Sent from my iPad

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- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 2 All comments will be provided to the decision makers for consideration. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 3 Comment noted. While the comment expresses concern about significant negative impacts related to noise truck traffic, pollution, and crime, the comment does not raise a specific issue or concern about the content of the Draft EIR therefore a more detailed response cannot be provided. Refer to the following Draft EIR Sections for discussion of impacts related to noise (4.13), air quality (4.3), and transportation (4.16).
- 4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

Letter I-5

From: tomchelbana@comcast.net  
To: Chris Ormsby  
Subject: Change in zoning for north east Moreno Valley  
Date: Friday, May 14, 2021 12:19:56 PM

Warning: External Email - Watch for Email Red Flags!

Hi Chris,

My name is Tom Chelbana, and my wife of 53 years, is Teri. I was born at March Air Force Base in April of 1948 and am a life long resident of Moreno Valley. Teri moved here in 1953 and is also a life time resident. We both graduated from Moreno Valley HS myself part of the 1st graduating class in Moreno Valley in 1966. I returned to Moreno Valley HS in 1972 being the first returning graduate to teach there, and I was a career/vocational education instructor for 36 years MV. My wife was also a Moreno Valley teacher and she taught at Bear Valley for 22 years. My father, Frank Chelbana, was mayor of Moreno Valley in 1992 when he passed away in office. For many years there was the Frank Chelbana Community Service Award, which I chaired, to recognize citizens for their service to the city. Frank Chelbana always was thinking of the citizens of MV and what was best for MV. The changes to the general plan from 2006 isn't best for the city or residents in this area of MV. As a resident in this area where the zone changes are proposed, we want to voice our strong opposition to zone change. We have lived in Moreno Valley for 65 plus years and these changes wouldn't be best for our citizens, but it would be great for developers who will benefit from the Iddo Benzevvi loaded city council and planning commission. This section of MV doesn't need to have commercial and high density of 10 homes per acre. The area has for over 50 years been zoned for large lots and allowing animals on their property. We ask to not change the zoning for the north east section of Moreno Valley.

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

Letter I-6

From: [Cipriano Castellano](#)  
To: [Chris Ormsby](#)  
Subject: General Plan concern  
Date: Thursday, May 13, 2021 11:34:13 AM

**Warning: External Email – Watch for Email Red Flags!**

hello there, I am Cipriano castellano  
& I do live in Moreno Valley in the Northeast.

I would like to KEEP the 2006 General Plan in place!  
I moved to this area for the open area & love it.  
The changes in the 2021 General Plan will bring  
to many variables & this will change OUR community  
especially the possible road enhancements which will  
bring more housing changes with "R" zoning.

2006 GENERAL PLAN is for me & my family.

thanks for your time,

Castellano Family

1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

Letter I-7

From: Ronald Dudeck  
To: Chris Ornela  
Cc: obbaque@gmail.com; Ulises Cabrera  
Subject: GRU/CAP meetings and documents  
Date: Thursday, April 29, 2021 5:57:16 PM

Warning: External Email - Watch for Email Red Flags!

Hi Chris,

Shortly after moving to Moreno Valley in 1996, I served on the PAC, [Redevelopment] Project Area Committee and later the Traffic Safety Commission and during those years AquaBella was planned and zoned for over 4000 homes, apartments and perhaps medical operations.

During these past 10 or so years council members when asked, informed me that AquaBella was basically a dead project, but we did see Nason extended and strategically wind from Cactus to Iris through the project area with property East of Nason said to be zoned for Medical use and that West remaining Residential.

We now see the latest MCC-4 Proposed General Plan includes "AquaBella" as a Specific Plan completely zoned Commercial.

Would that zoning include warehouse operations, manufacturing, corporate offices both single and multilevel buildings in addition to various medical and retail operations, or is the zoning "very" specific?

Where can we receive a summary copy of the "AquaBella" specific plan detailing commercial plans for the area bordered by Cactus, Iris, Oliver and LaSalle?

Please continue to keep us notified of all meetings relating to General and Specific Plan Updates, Climate Action Plan and related documents.

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1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. City staff followed up with commenter regarding the questions in the letter.

LETTER

RESPONSE

Thanks for all you do.

We hope to hear from you soon, be safe.

Ron and Barbara Dudeck  
15670 Oliver Street

*sent from my MacBook Pro*

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Cont.

Letter I-8

From: Ronald Dudeck  
To: Chris Ormsby  
Cc: ulfesci@moval.org; gbhague@gmail.com  
Subject: Dudeck; AquaBella Question  
Date: Sunday, May 2, 2021 11:42:38 AM  
Attachments: Screen Shot 2021-05-01 at 7:06:53 PM.png  
Screen Shot 2021-05-02 at 11:10:34 AM.png

Warning: External Email – Watch for Email Red Flags!

Hi Chris,

We found SP-218 at [MV CDD Specific Plans \(moreno-valley.ca.us\)](http://MV.CDD Specific Plans (moreno-valley.ca.us)).

The AquaBella specific plan as SP-218 was City Council adopted in December of 2005 as Ord #703 as a specific primary planned zoned residential single family, multi-family gated community with lakes, recreational bike trails, club house areas on approximately 97% of project's 760 acres with small retail commercial support zones. [attachment]

Question; has there been city approved amendments to SP-218 changing the Specific Plan from primary residential zoning to commercial, but have yet to be made available on the City's Web Online posting for public viewing?

Satellite images of the SP-218 area shows grading changes made since 2005 that appear to be commercial building pads adjacent to and North of Kaisers Hospital property toward the University Medical Center. [attachment]

Hope to hear from you soon.  
Again, thanks for all you do.

Regards,  
Ron and Barbara Dudeck  
15670 Oliver Street

*sent from my MacBook Pro.*

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1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. City staff followed up with commenter regarding the question in the letter.

Letter I-9

From: Eric Dunn
To: Chris Ormsby
Subject: RE: GP Land Use
Date: Friday, April 9, 2021 2:57:34 PM

Warning: External Email - Watch for Email Red Flags!

Chris: Thanks. A few preliminary comments:

- 1. What is driving the recommendation for R10 on the parcels I mentioned, i.e., whose idea is that?
2. The development of the industrial projects south of the 60, coupled with the WLC, will have dramatic impacts on truck traffic and air quality.
3. Moreno Valley is due to receive some \$50M in ARP funds. I have lived here since being stationed at March in 1982.
4. District 2 does not currently have representation after the untimely death of Ms. Thornton.

-----Original Message-----
From: Chris Ormsby <chriso@moval.org>
Sent: Wednesday, April 7, 2021 5:40 PM
To: Eric Dunn <edunn@awattorneys.com>
Subject: RE: GP Land Use

\*\*\* EXTERNAL SENDER \*\*\*

Eric,

I am following up with regard to your comments. The consultant may have not responded to your questions because questions/public comments should be forwarded to staff.

Chris

Chris Ormsby
Senior Planner
Community Development
City of Moreno Valley
p 951-413-3229 | e: chriso@moval.org

[City of Moreno Valley] - http://www.moval.org - Original Message
From: Eric Dunn [mailto:edunn@awattorneys.com]
Sent: Monday, April 5, 2021 6:43 PM



- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City's Regional Housing Needs Assessment (RHNA) allocation in accordance with State Housing laws.
2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Traffic congestion as measured by level of service is no longer an issue that requires evaluation under CEQA.
3 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The City's RHNA allocations are not defined by the City or the County, they are established by the State and municipal planning organizations (e.g. SCAG).
4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.



LETTER

RESPONSE

To: Chris Ormsby <chriso@moval.org>  
Subject: RE: GP Land Use

Warning: External Email - Watch for Email Red Flags!

Chris: Thanks for the info. I do have additional questions, and I emailed the GP consultant but haven't heard back. I'm not a Planner but I've worked with many planners over the years. (In addition to Ferris I'm also the city attorney for Hesperia.) I stopped on my way home and took the attached picture from the north side of the 60 looking toward Ironwood. Those are the parcels we're talking about. There is no way they should be R10. Every part of any city needs to have some different character and attributes. I lived in the neighborhood behind the MV library for 12 years on a 5000 s.f. lot on Old Farm Street. Raised 3 kids there for 12 years, but then moved to this area with larger lots and a more rural character. We need to preserve that for future residents.

-----Original Message-----

From: Chris Ormsby <chriso@moval.org>  
Sent: Monday, April 5, 2021 6:02 PM  
To: Eric Dunn <edunn@awattorneys.com>  
Subject: RE: GP Land Use

\*\*\* EXTERNAL SENDER \*\*\*

Eric,

Just following up with regard to your email on Friday. There have been no entitlement applications submitted yet on the property. If you have any additional questions, please let me know.

Chris

Chris Ormsby  
Senior Planner  
Community Development  
City of Moreno Valley  
p: 951.413.3229 | e: chriso@moval.org <<mailto:chriso@moval.org>> w: [www.moval.org](http://www.moval.org) <<http://www.moval.org>>  
14177 Frederiek St., Moreno Valley, CA 92553

[City of Moreno Valley] <<http://www.moval.org>> -----Original Message-----

From: Eric Dunn [<mailto:edunn@awattorneys.com>]  
Sent: Friday, April 2, 2021 4:37 PM  
To: Chris Ormsby <chriso@moval.org>  
Subject: RE: GP Land Use

Warning: External Email - Watch for Email Red Flags!

OK, thanks. I appreciate it. I got your email from a neighborhood facebook group post (sigh) so please let me know if I should ask someone else.

-----Original Message-----

From: Chris Ormsby <chriso@moval.org>  
Sent: Friday, April 2, 2021 4:34 PM  
To: Eric Dunn <edunn@awattorneys.com>  
Subject: Re: GP Land Use

\*\*\* EXTERNAL SENDER \*\*\*

Eric,

5 See response to comment 1 above.

6 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

Thanks for your input. I am not aware of any development applications that have been submitted on these parcels. I am working remotely so I will need to confirm on Monday with our current planning staff. I will followup with you on Monday

Chris

Sent from my iPhone

Chris Ormsby  
Senior Planner  
Community Development  
City of Moreno Valley  
p: 951.413.3229 | e: [chriso@moval.org](mailto:chriso@moval.org) | <mailto:chriso@moval.org> | w: [www.moval.org](http://www.moval.org) | <http://www.moval.org>  
14177 Frederick St., Moreno Valley, CA 92553

[City of Moreno Valley] | <http://www.moval.org> | On Apr 2, 2021, at 4:27 PM, Eric Dunn  
<[edunn@awattorneys.com](mailto:edunn@awattorneys.com)> wrote:

?  
Warning: External Email - Watch for Email Red Flags!

Hi Chris: I saw the proposed land use plan on the website. Can you please tell me who owns the parcels circled in red, and if they have submitted any applications? I've seen people out on the sites doing borings or perc tests, which seems to be putting the cart before the horse since the GP and zoning haven't been changed yet. Also, from a planning standpoint it does not seem appropriate to put R10 directly across the street from R2 without some sort of buffer in between. At most that should be R5. Full disclosure is I have been the City Attorney for Perris for nearly 20 years, and I have lived in this area of Moreno Valley for over 20 years. So I have an interest in preserving the rural character of NE Moreno Valley, but I also know how the development world works. I would like to know what is being proposed there and who the owner/developer is. Thanks.

<image001.png>

Eric L. Dunn | Partner  
Aleshire & Wynder, LLP | 3880 Lemon Street, Suite 520, Riverside, CA 92501  
Tel: (951) 241-7338 | Fax: (951) 300-0985 | [edunn@awattorneys.com](mailto:edunn@awattorneys.com) | <mailto:edunn@awattorneys.com> | [www.awattorneys.com](http://www.awattorneys.com) | <http://www.awattorneys.com>

7

7 See response to comment 1 above. City staff followed up with commenter regarding the question in the letter.

## Letter I-10

**From:** Eric Dunn  
**To:** Dr. Yustian A. Gutierrez; Victoria Baca; David Marquez; Ulises Cabrera  
**Cc:** Mike Lee; Chris Ormsby; City Attorney  
**Subject:** General Plan Update  
**Date:** Friday, April 23, 2021 5:31:54 PM

**Warning: External Email – Watch for Email Red Flags!**

Hi All: I've been a resident since 1982 when I was stationed at March. We lived for 12 years in the tract behind the Library, and moved to the Northeast area over 20 years ago. Our 3 kids all graduated from Valley View. I see there is a General Plan update underway and I have sent some comments to Chris. I request that you publicly confirm you will not be taking any action on the GP until we have a new Councilmember to represent District 2. With the untimely passing of Ms. Thornton, and the lack of an appointment, the 50,000 Moreno Valley residents in District 2 have no representation on the Council. You should put off any action until after the election in November as a matter of public trust.

I'm not sending this to you as an attorney, although I have been the city attorney for Perris for the last 20 years so I know how this works. I'm asking you as a resident. Please don't make decisions for District 2 until someone is on the dais to represent District 2.

Thanks.

**Eric L. Dunn** | Partner  
**Aleshire & Wynder, LLP** | 3880 Lemon Street, Suite 520, Riverside, CA 92501  
 Tel: (951) 241-7338 | Fax: (951) 300-0985 | [edunn@awattorneys.com](mailto:edunn@awattorneys.com) | [awattorneys.com](http://awattorneys.com)

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The City has provided opportunities for participation of all residents, including District 2 residents. As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initially, the City “focused on community outreach to identify the most important issues to address within the General Plan and to establish a vision for the future of Moreno Valley. This phase included stakeholder interviews, six ‘pop-up’ outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members” (page 2-9). The City also formed the General Plan Advisory Committee (GPAC), who “served as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU” (page 2-9).

The City then conducted a second community-wide survey and multiple public meetings, which allowed City staff to explore and refine the pros and cons of six different concepts “with input from the community, GPAC, and Planning Commission. Between December 2019 and May 2020, close to 1,000 community members participated in the 2021 GPU process. In June 2020, the City Council provided input on and concurred with the Preferred Plan Concept, which is now part of the proposed 2021 GPU” (page 2-9).

Letter I-11

From: Elaine Farmer  
 To: Chris Ormsby  
 Subject: Mo Val General plan update comments  
 Date: Monday, May 17, 2021 1:39:22 PM  
 Attachments: Mo Val General plan letter.docx

**Warning: External Email - Watch for Email Red Flags!**

Dear council, staff & planning commission,

I am writing to voice my opposition to the proposed general plan update and draft EIR and ask that this document be entered into the public record. The significant negative impacts to my neighborhood would be extreme and not mitigated which will damage my health and quality of life. It is important to maintain our community character and we add to the diversity of housing that was ignored in the new plan. Within the draft EIR, CEQA identified two alternatives that protect the NE end of Moreno Valley, **6.4 Reduced Growth Alternative and 6.5 Redistributed Growth Alternative which has been identified as 6.6 Environmentally Superior Alternative**. Both of these alternatives retain our 2006 general plan land uses in the NE and are the appropriate actions. Please consider these alternative options

I am wanting to know how the truck traffic will be dealt with. There are already trucks on non-truck areas of Ironwood, which cause giant pot holes, noise & traffic issues. I was behind a semi at a red light, due to slight incline on Ironwood it took the semi so much time to get up to speed that it was the only vehicle that made it through the light. Are we going to have truck police? How will trucks coming and going all hour's impact residents in this area? People will no longer be able to sleep with windows open during nice weather.

Looking at the NE 2006 General plan & then the 2021 general plan, I'd like to know what happened. Why was there limited participation allowed for residents? Why were there no residents from NE Mo Val appointed to the committee?

Why aren't there any minutes available for the public to read on the committee meetings? It makes it appear there is something to hide. We are tax payers, we live in this community, and we should be able to know what was discussed throughout this plan, why weren't we kept informed?

People who choose to live in NE Mo Val embraced the large lots, these were protected and promoted. As executive style housing & semi-rural. What diversity is there in 2021 plan for large lots? What about NE Mo Val being the only area left for large animal keeping? The bulk of the other areas like this are gone. WLC took over south of the 60.

How can there be any way to keep the noise down, there are no new technologies for noise pollution? Sound walls don't work, sound bounces. What about protecting our night sky? Yes light are supposed to be lower but reality is traffic all night coming & going will affect the area.

The 2021 plan mentions "could" be such things as fine dining & attractive retail. Why won't it clearly be stated instead of could be? Ironwood & Heacock said could be... & then once again they built nothing but warehouses, it is an eyesore that blocks views. How can our city allow the public to be misled by saying possibly retail, possible fine dining & we end up with warehouses? Traffic will be horrendous when trucks start coming and going. Plus the added noise all hours.

Moreno Valley is becoming a warehouse community, it takes away from our quality of life. NE Mo Val attracted people because it was large lots, large animal, protected night sky, and the quiet of having a home on large lot.

We have very bad air quality in this area of the Inland Empire and this will increase bad air quality further, due to all of us being in the parking lot called HWY 60. We have very few east

- 1 Comment noted and will be part of the public record. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 2 The General Plan includes policy EJ.1-9, to "Designate truck routes that avoid sensitive land uses, where feasible." Regarding truck routes, the draft General Plan Circulation Element states, "Truck traffic on City streets is restricted to specific routes that are designated for thru traffic of trucks over three tons; the truck network system is identified in the City's Municipal Code. These truck routes help to facilitate the movement of goods throughout the city, while providing a connection between major highway facilities (i.e., SR-60 and I-215) to local roadways, such as Alessandro Boulevard and Heacock Street." This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 3 All public outreach events, and materials from meetings are available to the public on the City's website for the General Plan Update <http://www.moval.org/cdd/documents/general-plan-home.html>. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 5 This comment does not raise an issue regarding adequacy of the EIR, bur poses several concerns and questions. Regarding comments about methods to reduce noise, for existing noise sensitive land uses, possible noise-reduction measures would include retrofitting older structures with acoustically rated windows and doors featuring higher Sound Transmission Class ratings, which is a measure of exterior noise reduction performance. However, as stated in the EIR, there is no mechanism in place for implementing such a retrofit program. Because the significant noise impacts would be to existing homes and other noise-sensitive uses in an already urbanized area, there is no feasible mitigation and the EIR concluded that impacts would be significant and unavoidable. Notwithstanding this conclusion, future development would be required to undergo a site specific environmental review to identify site design and other measures to minimize noise and light pollution to the extent feasible.

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west roads in Mo Val already, what will be done to not further the terrible congestion we already have? It takes as long to get out of Mo Val now on the 60/215 due to truck traffic as it does to then get to Arlington Ave exit after we get past the slow drive leaving Mo Val. Our residents sit on the freeway due to trucks now, how will this congestion increase help us? Grants for electric trucks does nothing for the cars stuck in traffic due to congestion. What is the plan to prevent further congestion this will cause?

5  
cont.

Plan mentions trucks can't idle more than 5 minutes, a indoor area for drivers will be available, some drivers have dogs traveling with them, will those dogs be allowed inside during out hot summers as trucks can't idle?

6

The peace & quiet that we enjoy in NE Mo Val has been a blessing to us, we feel like we live in the country while being in town. The state of California has caused us to think of leaving yet we want to stay, regardless that friends have left the state. Destroying our semi-rural lifestyle will probably be the last nail in the coffin to just leave California. Please consider the alternate options.

7

Why doesn't the plan include the negative impacts of WLC and MV Trade Center?

8

Again, please consider these alternative options Within the draft EIR, CEQA identified two alternatives that protect the NE end of Moreno Valley, **6.4 Reduced Growth Alternative and 6.5 Redistributed Growth Alternative which has been identified as 6.6 Environmentally Superior Alternative.** Both of these alternatives retain our 2006 general plan land uses in the NE and are the appropriate actions.

9

Elaine Ferrier

Resident of NE Moreno Valley

6 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

7 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

8 The EIR analysis assumes build-out of the WLC and MV Trade Center. See Section 3.2.4 of the DEIR for a description of the methodology used for Buildout Projections.

9 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

Letter I-12

From: [Sam & Shirley Fuller](#)  
To: [Chris Ormsby](#); [David Marquez](#)  
Subject: North East Moreno Valley - General Plan  
Date: Sunday, May 16, 2021 4:07:47 PM

**Warning: External Email – Watch for Email Red Flags!**

Dear City Council members,

We are residents of North East Moreno Valley (Moonlight Rim) and disagree with any change to 2006 general plan.

We object to the following in our NE Moreno Valley neighborhood:

1. Additional warehouses
2. Truck Stops/Truck fueling stations
3. New homes on less than a half-acre
4. Loss of neighborhood right to keep animals

We purchased a home in NE Moreno Valley because it did not have warehouses and the pollution that warehouses bring. We do not want to be like Mira Loma, Bloomington or Ontario. Our area is one of the best places to live in Moreno Valley and we chose to live here because it is rural. We are not against homes built on a half-acre or progress that fits our neighborhood culture.

A winery would have brought business to Moreno Valley and provided jobs not trucks.

Also, the 60 Freeway cannot handle the traffic it has now from Gilman Springs to Riverside. It is a horrible drive now to Riverside and the trucks from the 215 freeway merging on the 60 freeway is a nightmare.

Respectfully,

Samuel & Shirley Fuller  
11165 Raymond Rd  
Moreno Valley, CA 92555

1

2

1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Traffic congestion as measured by level of service is no longer an issue that requires evaluation under CEQA. Impacts associated with transportation are presented in Section 4.16 Transportation of the Draft EIR.

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Letter I-13

**Chris Ormsby**

**From:** George Hague <gbhague@gmail.com>  
**Sent:** Tuesday, March 30, 2021 3:49 PM  
**To:** Chris Ormsby  
**Cc:** Claudia Manrique; andrew@dyettandbhatia.com; City Clerk  
**Subject:** AG letter to add to the General Plan Update (GPU) and Climate Action Plan (CAP) public record  
**Attachments:** AG warehouse-best-practices March 21.pdf

Good afternoon Mr Ormsby,

Please confirm the attached letter from our former attorney general will be part of the public record for the Moreno Valley General Plan Update and Climate Action Plan. The letter was released to the public earlier this month.

Stay safe,

George Hague

1 Comment noted. The letter from the attorney general that was attached to this email has been received and is included in the record of comments on the Moreno Valley General Plan Update and Climate Action Plan.

XAVIER BECERRA  
Attorney General

State of California  
DEPARTMENT OF JUSTICE



**Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act**

In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)<sup>1</sup> regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies, and in rare cases the Bureau has filed litigation to enforce CEQA.<sup>2</sup> This document builds upon the Bureau's comment letters, collecting knowledge gained from the Bureau's review of hundreds of warehouse projects across the state. It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.<sup>3</sup> While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, the overwhelming majority of which have been adapted from actual warehouse projects in California.

**I. Background**

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.<sup>4</sup> California, with its ports, population centers, and transportation network, has found itself at the center of this trend. For example, in 2014, 40 percent of national container cargo flowed through Southern California, which was home to nearly 1.2 billion square feet of warehouse facilities.<sup>5</sup> In the Inland Empire alone, 150 million square feet of new industrial space was built over the last decade,<sup>6</sup> and 21 of the largest 100 logistics leases signed in 2019 nationwide were in the Inland

<sup>1</sup> <https://oag.ca.gov/environment/justice>.

<sup>2</sup> <https://oag.ca.gov/environment/ceqa/letters>; *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).

<sup>3</sup> Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.

<sup>4</sup> As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short or long term basis for later distribution to businesses and/or retail customers.

<sup>5</sup> Industrial Warehousing in the SCAG Region, Task 2. Inventory of Warehousing Facilities (April 2018), [http://www.scag.ca.gov/Documents/Task2\\_FacilityInventory.pdf](http://www.scag.ca.gov/Documents/Task2_FacilityInventory.pdf) at 1-1, 2-11.

<sup>6</sup> Los Angeles Times, *When your house is surrounded by massive warehouses*, October 27, 2019, <https://www.latimes.com/california/story/2019-10-27/fontana-california-warehouses-inland-empire-pollution>.



Empire, comprising 17.5 million square feet.<sup>7</sup> This trend has not slowed, even with the economic downturn caused by COVID-19, as e-commerce has continued to grow.<sup>8</sup> Forecasts predict that the Central Valley is where a new wave of warehouse development will go.<sup>9</sup>

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO<sub>x</sub>)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particulate matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.<sup>10</sup> Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.<sup>11</sup> The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents. These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts.

<sup>7</sup> CBRE, *Dealmakers: E-Commerce & Logistics Firms Drive Demand for Large Warehouses in 2019* (January 23, 2020), <https://www.cbre.us/research-and-reports/US-MarketFlash-Dealmakers-E-Commerce-Logistics-Firms-Drive-Demand-for-Large-Warehouses-in-2019>; see also CBRE, *E-Commerce and Logistics Companies Expand Share Of Largest US Warehouse Leases, CBRE Analysis Finds* (Feb. 25, 2019), <https://www.cbre.us/about-media-center/inland-empire-largest-us-warehouse-leases> (20 of the largest 100 warehousing leases in 2018 were in the Inland Empire, comprising nearly 20 million square feet).

<sup>8</sup> CBRE, 2021 U.S. Real Estate Market Outlook, Industrial & Logistics, <https://www.cbre.us/research-and-reports/2021-US-Real-Estate-Market-Outlook-Industrial-Logistics>; Kaleigh Moore, *As Online Sales Grow During COVID-19, Retailers Like Montee Swim Adapt And Find Success*, FORBES (June 24, 2020), available at <https://www.forbes.com/sites/kaleighmoore/2020/06/24/as-online-sales-grow-during-covid-19-retailers-like-montee-swim-adapt-and-find-success/>.

<sup>9</sup> New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), available at <https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html>.

<sup>10</sup> California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health> (NO<sub>x</sub>); California Air Resources Board, Summary: Diesel Particulate Matter Health Impacts, <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>; Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf> (DPM).

<sup>11</sup> Noise Sources and Their Effects, <https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm> (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

## II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically address warehouse development, we encourage governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and guide sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

Proactive planning can take any number of forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors can help avoid conflicts between warehouse facilities and residential communities.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.<sup>12</sup>

The Bureau is aware of four good neighbor policies in California: Riverside County, the City of Riverside, the City of Moreno Valley, and the Western Riverside Council of Governments.<sup>13</sup> These policies provide minimum standards that all warehouses in the jurisdiction must meet. For example, the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors, and it requires a number of design features to reduce truck impacts on nearby sensitive receptors. The Riverside County policy requires vehicles entering sites during both construction and operation to meet certain California Air Resources Board (CARB) guidelines, and it requires community benefits agreements and supplemental funding contributions toward additional pollution offsets.

The Bureau encourages jurisdictions to adopt their own local ordinances and/or good neighbor policies that combine the most robust policies from those models with measures discussed in the remainder of this document.

<sup>12</sup> For more information about SB 1000, see <https://oag.ca.gov/environment/sb1000>.

<sup>13</sup> <https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf> (Riverside County); <https://riversideca.gov/planning/pdf/good-neighbor-guidelines.pdf> (City of Riverside); [http://qcode.us/codes/morenovalley/view.php?topic=9-9\\_05-9\\_05\\_050&frames-on](http://qcode.us/codes/morenovalley/view.php?topic=9-9_05-9_05_050&frames-on) (City of Moreno Valley); <http://www.wrcog.co.gov/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId=> (Western Riverside Council of Governments).

### III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The information should be in a format that is easy to navigate and understand for members of the affected community.
- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community relations officer to the surrounding community.

### IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near other sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local

communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per CARB guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.<sup>14</sup>
- Creating physical, structural, and/or vegetative buffers that adequately prevent or substantially reduce pollutant dispersal between warehouses and any areas where sensitive receptors are likely to be present, such as homes, schools, daycare centers, hospitals, community centers, and parks.
- Providing adequate areas for on-site parking, on-site queuing, and truck check-in that prevent trucks and other vehicles from parking or idling on public streets.
- Placing facility entry and exit points from the public street away from sensitive receptors, e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Locating warehouse dock doors and other onsite areas with significant truck traffic and noise away from sensitive receptors, e.g., placing these dock doors on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Screening dock doors and onsite areas with significant truck traffic with physical, structural, and/or vegetative barriers that adequately prevent or substantially reduce pollutant dispersal from the facility towards sensitive receptors.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

#### V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers

<sup>14</sup> California Air Resources Board (CARB), Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted under varying scenarios; this document may be found on CARB's website and is entitled: "California Sustainable Freight Initiative: Concept Paper for the Freight Handbook" (December 2019).

should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as regulations tighten and demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation. CEQA Guidelines § 15369.
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is a baseline expectation.
- Fully analyzing impacts from truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin. Emissions beyond the air basin are not speculative, and, because air pollution is not static, may contribute to air basin pollution. Moreover, any contributions to air pollution outside the local air basin should be quantified and their significance should be considered.
- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California's Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be zero-emission, where available, and all diesel-fueled off-road construction equipment, to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable

bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.

- Prohibiting off-road diesel-powered equipment from being in the “on” position for more than 10 hours per day.
- Requiring on-road heavy-duty haul trucks to be model year 2010 or newer if diesel-fueled.
- Providing electrical hook ups to the power grid, rather than use of diesel-fueled generators, for electric construction tools, such as saws, drills and compressors, and using electric tools whenever feasible.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than two minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.
- Requiring on-site equipment, such as forklifts and yard trucks, to be electric with the necessary electrical charging stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all

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dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the air district, and the building manager.

- Installing and maintaining, at the manufacturer’s recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer’s recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Constructing electric truck charging stations proportional to the number of dock doors at the project.
- Constructing electric plugs for electric transport refrigeration units at every dock door, if the warehouse use could include refrigeration.
- Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building’s projected energy needs.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Achieving certification of compliance with LEED green building standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency’s SmartWay program, and requiring tenants to use carriers that are SmartWay carriers.

- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

#### VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

#### VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if



truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

**VIII. Other Significant Environmental Impacts Analysis and Mitigation**

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.

- Using full cut-off light shields and/or anti-glare lighting.
- Using cool pavement to reduce heat island effects.
- Installing climate control in the warehouse facility to promote worker well-being.
- Installing air filtration in the warehouse facility to promote worker well-being.

**IX. Conclusion**

California's world-class economy, ports, and transportation network position it at the center of the e-commerce and logistics industry boom. At the same time, California is a global leader in environmental protection and environmentally just development. The guidance in this document furthers these dual strengths, ensuring that all can access the benefits of economic development. The Bureau will continue to monitor proposed projects for compliance with CEQA and other laws. Lead agencies, developers, community advocates, and other interested parties should feel free to reach out to us as they consider how to guide warehouse development in their area.

Please do not hesitate to contact the Environmental Justice Bureau at [ej@doj.ca.gov](mailto:ej@doj.ca.gov) if you have any questions.

Letter I-14

From: [George Harner](#)  
To: [Chris Ormsby](#)  
Cc: [City Clerk](#)  
Subject: Comments on Moreno Valley Community Survey #1 GPJ/CAP/DEIR  
Date: Monday, May 17, 2021 11:34:55 AM

Good morning Mr Ormsby,

RE: General Plan Draft EIR (DEIR) and Climate Action Plan (CAP) comments

Community Survey #1 "received a total of 597 responses." While the public told the the staff and consultants that questions related to the warehouse/logistic center industry needed to be on the survey, they were purposely left off. Despite that, almost 100 comments related to warehousing and their impacts were freely offered as you can read below.

As shown below from the survey from the question "What do you like least about living in Moreno Valley?" the first three responses are related to warehousing and their impacts on our community.

**Below the following Community Survey #1 responses are some of my questions which require responses:**

What do you like least about living in Moreno Valley?

In response to what they liked least about living in Moreno Valley, survey respondents generally concurred that the following issues were major factors:

- prevalence and growth of warehouses
- heavy traffic especially due to trucks
- poor air quality and pollution
- crime and lack of police response
- homelessness
- lack of public involvement in civic decision processes, coupled with a strong distrust of local government
- poor maintenance of infrastructure and facilities
- lack of a town center with good shopping, dining, and entertainment

The topic of warehouses and the repercussions of increasing activity related to this land use were especially emphasized as a detractor to community identity and a sense of place. The expansion or

- 1 Comment noted. The letter from the attorney general that was attached to this email has been received and is included in the record of comments on the Moreno Valley General Plan Update and Climate Action Plan.

revitalization of shopping centers, cultural venues, and entertainment corridors was identified as a better way to serve the needs of current residents. There was a particularly strong desire for more leisure activities and the provision of programs, facilities, and events to include options for all age groups. Others were concerned that the addition of warehouses would limit job industries in Moreno Valley and encouraged investment in strategies that would diversify the economy with more professional and technical jobs.

Another major topic was the perception and reputation of Moreno Valley, with respondents pointing to high amounts of crime, homelessness, illegal trash dumping, and poor conditions of roads. As such, survey respondents called for more regular maintenance and infrastructure improvements, stricter code enforcement, and more responsive police service or the establishment of the city's own police department.

"Moreno Valley 2040 General Plan Update: Community Survey Report

Appendix: Open-Ended Responses

1. What do you like most about living in Moreno Valley? (496 Responses Total)

- 1 Proximity to natural spaces and easy access too freeways for commute
- 2 The surrounding hills and open spaces.
- 3 The geography. We have scenic 360 of surrounding hills and uneven terrain.
- 4 The location is great to get to L.A, the beach, the desert or the mountains.
- 5 Like the surrounding hill/mountains and open space to explore. Like the more laidback suburban feel of our community.
- 6 Housing affordability, suburban living and lifestyle.
- 7 open spaces to be out doors, affordable housing.
- 8 Location and accessibility to southern California activities -- beach, mountains, etc.
- 9 The large, unoccupied plots of land
- 10 It had promises as a desirable location in the late 1980's
- 11 All the stores

1  
Cont

## LETTER

## RESPONSE

12 I enjoy living in the rural east end of Moreno Valley. I moved here for the ability to have acreage, to keep animals, and fewer neighbors.

13 I enjoy hiking in the surrounding mountainous areas, the views of Mt. San Jacinto, and the pleasant winter weather.

14 Friendly residents & hard-working small business owners.

15 My house, most of my neighbors and the weather

16 I like the Eastern part of Moreno Valley where I live, because its still open. Also, our city is not crowded and congested like Riverside.

17 I have a lot of family there so I like the close community

18 I live on the Northeast section of the city. I like the open areas, large lots for houses.

19 I like that we are close to all freeways we have a nice Mall and many stores.

20 nothing

21 Smaller city, with open areas

22 The NE end of Moreno Valley

23 It's Moreno Valley, it's home.

24 The rural nature of the NE end of Moreno Valley

25 Love having close things around

26 Close friends and many activities to be apart of.

27 Close community

28 The rural NE Moreno Valley. That is the reason we moved here. It is nice to have space between our properties. I like seeing the vistas, feeling the breezes, and darker skys. I also like the fact that by not having high density, business, and horrible ugly and noisy warehouses makes this area safer to live in.

29 Love the close community.

30 On my neighborhood is pretty safer we don't have any problem

31 I like the availability of semi-rural living on the perimeter of the city, not too crowded but still close enough to convenience like a Walmart at each end of town

32 It be a great city if high tech, medical, and real manufacturing jobs were made available to citizens.

33 A potential to create jobs that will afford people careers in hi tech, medical, and real manufacturing areas. Warehouses do not provide this opportunity.

34 Location

35 Trails, parks, open spaces, close shopping centers, and similar.

36 Mall

## LETTER

## RESPONSE

37 I like living in Moreno Valley because of the Peacefulness and quiet neighborhood  
38 It's quite and affordable where I live.  
39 Lake  
40 The weather  
41 Variety of living options. Open space reserves. Convenient shopping options.  
42 Home and Backyard  
43 The location  
44 The location  
45 Proximity to desert, mountains, beach, LA and SD  
46 I grew up here. I want this to be a good place to live, but there isn't much to like at this time.  
47 Park's  
48 What I like the most about Moreno Valley are the parks and the mall.  
49 What I like most about living in Moreno Valley are the schools in the Moreno Valey Unified School District.  
50 The beautiful hills we hike in and the wild life  
51 The quiet rural east end where we have protected our large animal keeping lots, trails, wild animal corridors, night sky, low crime area.  
52 The quite and tranquil rural felling of the east end of town.  
53 It's home  
54 Openess and beauty of hillsides, Lake perris.  
55 That is surrounded by beautiful mountains, the proximity to the mall and shopping areas  
56 Vast spaces.  
57 Rolling Hills, open space, hiking trails within short distance. No graffiti.  
58 Views, weather, and not as expensive as other southern california cities.  
59 The clime  
60 Nice place  
61 Open land north of 60  
62 MV is kind of a bedroom community, quiet and friendly but with close access to shopping and entertainment. It is NOT LA, thankfully.  
63 It's home  
64 Today? Nothing. This town is an absolute dump these days.  
65 Open spaces  
66 Oh I like the surrounding and the community here in Moreno Valley.  
67 The weather and the convenience of having certain things nearby  
68 I like the food, the people  
69 Affordability  
70 central location to beaches, mountains & desert

## LETTER

## RESPONSE

71 Away from big city  
72 church  
73 Small & Quiet for the most part  
74 Close to work, affordable real estate  
75 Central location  
76 Its parks and safety  
77 That my job is located in Riverside, so I'm relatively close to it.  
78 Close to work  
79 The City is relatively small, better traffic than LA, close to UCR and other cultural centers  
80 That I can live here and get away from where I work  
81 That I've met a lot of great friends here. Also, proximity to many hiking trails in the area and open spaces.  
82 Location  
83 work is near to home and has a lot of restaurants/shopping centers to offer and still growing  
84 The people, that we are surrounded with beautiful mountains  
85 The great opportunity for growth and expansion that our city have in the limited land portion designated to create a job base.  
86 All my family lives here  
87 That my family lives here.  
88 The natural beauty of open space, surrounding mountain and hills.  
89 It's not Orange County.  
90 It's hard to think of something I like about Moreno Valley. It has changed so much for the worst.  
91 The rugged setting, the proximity to mountain resorts, the bird sanctuary east of Lake Perris.  
92 Not much these days...  
Possibly, only impressed with the Annual Fourth of July events and fireworks.  
93 My new home. Fwy access.  
94 Open Space with awesome scenic views. A sense of history that is not yet obliterated by suburban sprawl and "logistic"  
95 The Legacy of Land and beautiful mountains, with the most amazing nature of Roadrunners and Donkey 's of all size .  
96 The beautiful nature and landscaping.  
97 Affordability of homes, shopping, location conveniently located between multiple freeways/highways.  
98 I don't know

## LETTER

## RESPONSE

- 99 There's still some open space on the outskirts of town So there still a country city  
vibe here
- 100 Living on the MV Ranch Lake.
- 101 Good location between major cities
- 102 Being in Sunnymead Ranch
- 103 Being up in Sunnymead Ranch
- 104 It's quiet in the Northeast
- 105 Affordable housing and the driving proximity to the mountains, the beaches,  
and to Disneyland.
- 106 Wild donkeys, hiking, and family city events.
- 107 Knowing my surroundings and long time friends
- 108 The variety of housing offered. This allows people to move up to more  
expensive homes on larger  
lots as they do better financially without moving out of town.
- 109 Cost of living. Close to work.
- 110 Having open spaces to walk.
- 111 It has been a nice place for a long time.
- 112 Near hiking trails
- 113 I basically grew up here. My family and church is here.
- 114 the rural feeling
- 115 I love living next to Box Springs Mt. and the natural environment. I also love  
being close to Riverside.
- 116 The nature sites and parks.
- 117 I like being close to my family, I like my neighbors and the street I reside on.
- 118 Shopping malls
- 119 Open spaces on the N/E end of town!
- 120 Cheap rent
- 121 Small city. Mild traffic.
- 122 I'm not living on the streets of Moreno Valley
- 123 There's not a whole lot I like about MoVal. Most of it has gone down hill in the  
past decade to 15 years.
- 124 The diversity
- 125 Close to the lake and outdoor activities. there is almost every major store here
- 126 Open spaces, freeway proximity, graffiti removal
- 127 The rural open areas of the east end and the convenience of a big city within a  
few miles.
- 128 The abundance of parks and schools close by.
- 129 Low key city with affordable prices in housing.
- 130 The familiarity of where I grew up.
- 131 I've lived in Moreno Valley for a majority of my life. I always liked how  
Moreno Valley was a small  
city and not a huge busy town like Los Angeles or New York.
- 132 Winter weather



LETTER

RESPONSE

133 I like that we have a mall and that only 4 miles up Pigeon Pass you have wild donkeys running on the mountains. We also have so many shopping centers that we have a little bit of everything without traveling far.  
134 Its cultural diversity.  
135 O like towngate area were I live. Pretty convenient location.  
136 It is my hometown I lived here before it was even named Moreno Valley  
137 Prices are better than surrounding areas. Still has some wide open spaces.  
138 Diversity  
Scenery  
Location  
139 I love the North East of town. The quietness in the morning and evening. The wild life is alive and well.  
140 Cost of living. Lower taxes than other cities.  
141 Location - Being between San Diego and LA  
142 Relatively low cost of living and being close to nature in the hidden springs area.  
143 Job opportunity for my kids  
144 Wide variety of stores and restaurants, plus many evenings of cool breezes.  
145 Weather  
146 Our home. It is peaceful and quiet.  
147 One Acre housing for zoned for horses, decent stores, clean parks, wild donkeys  
148 All of the open land in Rancho Belago.  
149 Educational programs, college assistance and somewhat affordable houses  
150 The quiet yet suburban style of Moreno Valley. The diverse population and the proximity to many different areas.  
151 Nothing !  
152 It was close to my job in Riverside. Now I stay because my house is paid off. I like my neighborhood, too, though some aspects are concerning. Surrounding open space is a plus.  
153 Good store variety  
154 Nothing  
155 The mountains  
156 There's nothing to like. It's no longer a safe city  
157 Shopping and restaurants are close by  
158 It's clean and quiet  
159 My neighborhood seems very calm so far.  
160 My community is quiet.  
161 Being far away from family, community events for families, how close schools

## LETTER

## RESPONSE

are

162 Location and house prices

163 Has the potential to grow

164 Quiet

165 Not that much traffic as other bigger cities.

166 Clean community

167 My house on the lot with a gorgeous view of the valley and "Shadow

Mountain" up here in Western

Ridge.

168 Many shopping opportunities.

169 Availability of the hiking trail

170 I like that the city is small with everything you need is close, such as grocery stores, thre mall and shopping centers.

171 Close to where I work

172 Close to my job

173 The distance it is from anywhere you want to go

174 My commute to work.

175 Rural areas

176 Fwy access

177 At least where I live it's quite.

178 I have lived here most of my life so has my little family we love our city all of it.

179 Location

180 Open space/land to build future businesses and homes

181 The parks and community events.

182 Beautiful desert nearby although poorly maintained not cared for.

183 the beauty of all the surrounding hills

184 I have lived here for 37 years and enjoy the small town and country side in some areas.

185 Clean streets, cameras community events

186 Geographic location

187 The wife open area on the N.W. End of town.

188 Close to work.

189 I like the parks, the sense of community and wide open fields so we can enjoy the gorgeous mountains

around us.

190 Cost of Living

191 Quick Access to everything from food to services

192 I used to like how moreno valley was a pleasant town, affordable, the community had everything one needed.

193 My home.

## LETTER

## RESPONSE

194 It was an affordable place to live and raise a family  
195 The M mountain  
196 Affordable cost of living good location  
197 Large City  
Close To California Attractions  
Great Community  
Variety  
Diverse  
Great Place To Raise Family  
Many Schools  
198 Our schools and variety of businesses  
199 Its centralized  
200 It's my hometown!  
201 Its one of the cheapest cities  
202 Location to everything  
203 Small market stores. The accesible pharmacies. No major clubs. Farm market  
204 I don't. The violence in this city is out of control. The streets are filthy, the sense of community is gone.  
205 Mountains- birds- clear sky's and friendly and respectful customer service  
206 I like to see the M lit up at night on box springs mountain.  
207 Close to family  
208 Living near family  
209 Moreno Beach area  
210 Near my job.  
211 Homes are affordable  
212 I love my home  
213 I like the weather and the variety of stores, dining, and places around.  
214 The great school district  
215 Close to family  
216 Diverse community  
217 Location  
218 The thing i like the most is living near all the shopping areas near my house how the parks are kept clean and how secure the police make me feel.  
219 My view  
220 Shopping areas are close to each other  
221 Diversity  
222 The weather. Convenient stores near by. The mountain view  
223 The open area's and scenery, the parks, the view of the mountains  
224 1. It is free of graffiti  
2. It is a diverse cultures city  
3. The parks are kept in excellent condition

## LETTER

## RESPONSE

225 Nothing.  
226 Close to lots of things  
227 The constant mismanagement of taxpayer money  
228 It's clean streets  
229 Close to work  
230 Everything is close and easy access to.  
231 My neighborhood with large plot.  
232 Location  
233 Scenery. Location.  
234 I Enjoy Working and Living in the Same City  
235 The members of city hall are proactive about keeping the community looking  
its Best  
236 The donkeys  
237 Near Lake Perris  
238 Location.  
239 School district  
240 Somewhat affordable  
241 Shopping centers  
242 I'm close to work.  
243 Rural areas still left, undeveloped hillsides  
244 Area  
245 Affordable and close to the beach, desert, mountain and is a growing city  
246 It's whether and it a reference point close to other major cities and activities.  
247 The school district, the offerings of the city at the rec center and for continuing  
education for business  
owners  
248 Rural areas still left  
249 Affordable part of Southern Cali  
250 Moreno Valley's geographical placement.  
251 Location, I am about an hour away from everything.  
252 Close to work  
253 Nothing.  
254 The community.  
255 Beautiful hills, mountains and valley. Big sky. Lake Perris, Perris Auto  
Speedway, March Air Museum.  
256 Moreno Valley is not over popular yet, the traffic is not too bad and the house  
prices are reasonably  
compared to L.A.  
257 Having multiple places to shop that are all near by  
258 community  
259 rent price, it's not as expensive as Anaheim and not as far as Hemet  
260 I love the people and the leaderships of the City.  
261 I like how quickly Graffiti is removed

## LETTER

## RESPONSE

262 In our neighborhood its quiet. Bethune park area.  
263 They're building more places.  
264 The new buildings. New housing. Nice views  
265 The cost of my home.  
266 Diverse community  
267 Open space, nice neighbors, quiet area  
268 The mountains and open spaces. I used to love the dark evenings to be able to see the stars, but in the last few years it has become too bright to see almost all of them.  
269 The M, mountains,hiking trails, keep lighting it up and keep it clean please  
270 We are centrally located to a lot of entertainment and dining  
271 The Beautiful panoramic view of the mountains.  
272 The scenery and large homes.  
273 Lake perris.  
274 The short distance of the shopping areas, grocery stores and parks  
275 The new developments  
276 The general pace of life and cost of living  
277 I grew up in the area. I can't see myself living any where else.  
278 The wonderful views we have all around our city  
279 I like living with my family  
280 The feeling of being a part of a community and having access to it' elected leaders.  
281 Housing values  
282 calm quiet for the most part  
283 Its close to mayor freeways and can travel to many places from here  
284 It is a very well planned community. It has underground utilities and wide surface streets with meaningful safety regulations.  
285 The Beautiful Homes  
286 The people here and our parks. I also love the proximity to the beach, the mountains, and interesting areas in general.  
287 The open spaces and natural environment found in the northeast area which enticed us to move here 30 years ago  
288 Clear views of the mountains  
289 It's location.  
290 Everything I need or want is in the city and I don't have to go elsewhere  
291 people  
292 The availability of larger 1/2 lots at the east end where I have room for my RV and other toys.  
293 parks - walking track at LaSalle sports Complex. Need more walking tracks in other parts of town.

LETTER

RESPONSE

One new City Hall. Graffiti cleanup and cart removal teams!!!  
294 California weather  
295 The weather and proximity to mountains, desert and ocean.  
296 This is the place I was born and raised. This is my home.  
297 Centrally located with a rural feel. Close to the mountains.  
298 Beauty of area  
299 Newness of city and new homes and warehouses  
300 At least for now, it is located on the outskirts of open country with outstanding vista aesthetics.  
301 We have most amenities that we need. Nice mountain views. Like the diversity  
302 Affordable home and close to work  
303 Weather  
304 My little home that is near hospital and shopping.  
305 My neighborhood  
306 Quiet suburban atmosphere, a bit of country and city lifestyle. The best of both world's!  
307 Affordable home, kid's private school, the Church and active mayor.  
308 I like that even tho its big city it still has a small town feeling.  
309 central location  
310 The mountains and landscape  
311 More affordable than LA and OC, while still within driving distance to most places we want to go.  
312 That it used to be a bit rural  
313 Affordable housing  
314 What I like the most is the "M" mountain.  
315 Low cost of living  
Outdoor space parks  
316 Quiet neighborhood, underground utilities such as no telephone poles visible on east side of city.  
317 Location  
318 Availability of rural areas  
319 Lower cost of living.  
320 Reasonable home prices, our beautiful house in Rancho Belago  
321 I like the beauty and the nature that surrounds us. I like that we blend city and rural together. I like that we are diverse in race and economic status. I like the abundant parks, horse and bike trails, finally the golf course again, and an impressive State Park bringing in recreational people from out of the area, which helps out economy. I like how some areas look like some of the pricier city not far from here with the greenery along the streets making the areas look vibrant and cared for.

LETTER

RESPONSE

322 I don't know  
323 People are nice in this city. Also the parks are nicer.  
324 Not much  
325 Weather in the winter.  
326 Close to Riverside  
327 Central location  
328 It is quiet. The city traffic isn't bad. Beautiful location and scenery, especially when the hill are green.  
Shopping is very convenient.  
329 City camera system.  
330 It used to be a quiet little community, but now it's gotten way too big. With lots of homeless people and gangs  
331 cleaner air and not as crowded as riverside  
332 Affordable housing  
333 I like the affordable housing. My family has lived in Moreno Valley since 1990. It was the affordable home prices that brought us here. Today, median home prices here are less than Riverside, Temecula, and several other cities in the county.  
334 I like the diversity, public schools, Family Fun Fest, shops and restaurant choices, the "M" on the mountain, weekly online communication from the mayor, the amount of parks and walking/biking trails.  
335 Libraries  
336 The cost of my home  
337 The city is dedicated to maintaining a good image for my neighborhood  
338 Close proximity to my work.  
339 Closer to mountains  
340 Freeway access  
341 Community  
342 The clean streets and clean parks  
343 Quiet east end.  
344 It's close to the mountains, beach, city and desert.  
345 Close to shopping and freeways.  
346 Fairly quiet suburban setting  
347 It's quiet and safe from the section where I live  
348 farthest from OC we could get  
349 Nice, open spaces  
350 Surrounded by similarly growing communities...  
351 Close to work and family  
352 New job opportunities, programs to help people succeed, nice community

LETTER

RESPONSE

calendar, fireworks  
parade, March ARB musuem and annual show, and show, and nice senior citizen  
complex, lack of  
graffiti,  
353 housing cost  
354 I like living on the rural outskirts. It is an area that has maintained being  
relatively quiet  
355 Houses  
356 The serenity of living on the side of the mountains with a beautiful view.  
Living in nature.  
357 located near mountains, desert, beach, and good weather.  
358 Family and current safety! Accessibility to many nice areas!  
359 It's a smaller community than Los Angeles; the city officials listen to issues and  
try hard to fix them  
quickly.  
360 Low cost housing and rural environment  
361 Nice people  
362 Close to the freeways  
363 Low cost rent.  
364 I love that our community is small enough to feel like a family but large enough  
to provide a place of  
business, opportunity, and events!  
365 The friends I have made here.  
366 Medical  
367 Where I'm at is nice and quiet, but still close to shopping and town if I need  
anything  
368 OPEN SPACES, FLAT DEVELOPMENT, EASY TRANSIT WITHIN THE  
CITY. SMALL TOWN  
ASTMOSPHER.  
369 natural beauty of its geographic setting, diversity of the populace  
370 Good store plazas.  
371 Shadow Mountain is a quiet neighborhood.  
372 Low traffic, low population.  
373 The pocket of place I live in is quiet and peaceful.  
374 Availability of stores and restaurants  
375 The rural area we live in which is Moonlight Rim, northeast Moreno Valley.  
376 The overall general quietness and safety of my neighborhood.  
377 Affordable Housing most necessities are within city limits  
378 I like the quietness and being able to drive fast on the street. I like having real  
neighbors to talk to  
and share.  
379 The affordability  
380 Not as crowded as other places



## LETTER

## RESPONSE

381 The special services for my son with Down syndrome, shopping  
382 It's still quiet and not as crowded as the bigger cities  
383 Affordability  
384 The rural area I live in  
385 The open spaces and sense of community. The mayor is doing a great job so far too.  
386 My home is in Moreno valley  
387 Family has owned property here since the 1950's.  
388 The affordability of life here.  
389 We like the rural area of where we live. On the East end of town.  
390 It used to be a quite reprieve from the busy city I moved a way from but the quiet space is now gone as truck traffic rolls down the 60 freeway. The traffic is horrible as this city has now become a smoggy ugly mess like the area I left.  
391 Not much  
392 Open spaced living, not in the heart of the city life with all of the traffic and noise.  
393 The views and how quiet it is.  
394 diversity of people, cultures, ages,  
395 Location  
396 I like living in the rural area of town, and this is why we purchased our home.  
397 quiet, unpopulated, space to grow  
398 It's family oriented.  
399 The quiet atmosphere in the ne area of the city  
400 Location is important. In the NE part of MoVal, it is quiet and friendly. Not so much in other areas.  
401 My neighbors  
402 not much  
403 Quiet on North side  
404 The low cost of housing.  
405 The quiet area I live in the Northeast  
406 Proximity to beaches, mountains and desert. Backdrop of hills surrounded by snow capped mountains in the winter.  
407 Close to work  
408 Affordable housing options and room for all my horses.  
409 Easy access to being outdoors  
410 It's an up and coming city that has a lot of potential.  
411 A beautiful area and easy access to mountains and desert.  
412 Wide open spaces on the east end of town.  
413 We are not in LA  
414 Safe & Quiet

## LETTER

## RESPONSE

415 Location. Close to mountains, deserts, and beaches.  
416 underground utilities on east side.  
417 That my parents also live in the same town and I still have a rural location to live  
418 Where I live (north East), the peace and quiet.  
419 hmmm, can't really think of anything.  
420 That it's still rural in the east end where I have lived for over 55 years  
421 The people, how open it feels in the valley and generally not crowded  
422 The remote area I live in.  
423 My Church Community  
424 Affordable home prices.  
Very centralized, LA, San Diego, Palm Springs and the mountains  
425 small city in a Big City  
426 Space! I'm from LA so I appreciate the 2-3 lane roads. So many parks and I never have to fight for parking. Love it.  
427 The open nature areas, mountains. Moreno Valley has great potential to be the best city in California because of it's location.  
428 I can still have some elbow room. I'm not right on top of my neighbor.  
429 Rural large lots  
430 The quietness and good scenic views.  
431 the friendly people and the schools  
432 The peacefulness of living in 'horse country'.  
433 Close to UCR  
434 The wide open spaces that we still have around us  
435 That there are still wide open spaces around.  
436 Have been born here in 1948 and graduated and taught at MVHS for 36 years the open areas are what we like most. Most of our friends are our neighbors and living here in the north east area for almost 40 years this is our home Moreno Valley.  
437 Weather, proximity to ocean, mountains and desert.  
438 Small community with uncongested quiet areas.  
439 The remaining semi-rural nature of some of town.  
440 Location  
441 What I like about living in Moreno Valley is the peacefully living were I currently live. It is like a bit of country living outside the city life.  
442 Open space  
443 The open space that we have still in Moreno Valley. The wild life.  
444 Not much any longer.  
445 Quite neighborhood, open space, central location to mountains, desert and

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ocean.  
446 The rural area side of it.  
447 The north end has Ruel setting which makes it very peaceful.  
448 The many small business centers spread throughout the city and the close proximity it provides to the residents near each center. I really like that we have a level 4 trauma center and state of the art NICU at the county facility. I really like how the city has maintained a strong rural area while developing other areas for multi-family residences, and making room for both business and industrial parks, and encouraging warehousing development near transportation infrastructure.  
449 The open spaces and the large residential lots in the northeast part of the City. I also love the rural open areas of the City designed go livestock and agricultural needs.  
450 I live by the mountains, so the peacefulness and quietness  
451 It used to be Open spaces and a "rural" atmosphere  
452 Weather  
453 The beauty of the hills surrounding us and the sense of open space.  
454 being in northwest Moreno Valley on horse property with few lights so we can see the stars  
455 Diversity of housing options to include defined urban and rural areas of the City which allow those moving into the City and those moving within the City a variety of housing options to meet their needs and desires  
456 Affordable housing; easy access to freeway and shopping centers; hiking trails in surrounding mountains and hills; bike lanes around cities;  
457 Affordable living in Southern California.  
458 That there are a lot of parks.  
459 The physical geography of MoVal is really stunning. There are the Box Springs Mtns to the west, the Reche Hills to the North, the Badlands and beyond to the east and on a clear day, you can see all the way to the Elsinore Hills. If you are driving South from the most northerly portion of Perris Blvd., the view out over the valley floor is stunning. I also like the fact that a connection remains to the March Air Reserve Base. This city developed on the backs of those who served at March Air Base through the year and many of us still have connections to that proud past.

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460 Small town feeling  
461 A way from LA and the super busy resident streets that have a liquor store at every corner. Quieter streets where I live in MoVal.  
462 I love my house and the area to walk my dogs.  
463 Quality of affordable homes for sale and business growth  
464 The responsiveness of my counsel member and mayor.  
465 Lots of stores to shop at  
466 affordable housing / proximity to Riverside and Public transportation  
467 Convenience to work, reasonable housing prices.  
468 Friendly people, open space, good schools and nice parks.  
469 The weather, and location. So close to mountains, deserts, and beaches.  
470 The scenery  
471 More restaurants such as Cracker Barrel's and Grocery stores  
472 Close to family and friends.  
Newer communities  
473 The small-town feel compared to the size. I also love our central location to the southern California area points of interest.  
474 It's away from the big city.  
475 Peaceful community  
476 I like the weather and I like that I can walk my dog to the park or go bike riding with my family. We have a park that is walking distance. Towngate park. I also love that I have everything close to my home. Stores like Target, Costco, Winco etc....  
477 I like that our city still feels small in a sense. It's not overly crowded like L.A. It also seems like there are more improvements being done like road repairs.  
478 I like how quiet it is sometimes.  
479 The people! I find most of the time people are kind to each other like opening doors at the store, saying good morning and even many drivers letting you go first. Not something I experience in other cities.  
480 Affordable housing options.  
481 Nice small town feel with new exciting businesses  
482 Nothing unfortunately  
483 Close to where I work so my commute isn't horrible.  
484 New roads  
485 It is quiet  
486 If the where I grew up  
487 Close to college, close to restaurant, etc.

## LETTER

## RESPONSE

488 The wildlife, the amazing sunsets.  
489 How it is growing.  
490 Cost of living  
491 The cost  
492 That people can move from a starter house to a larger one with more land. We need to keep larger lots (1/2 and larger) to keep people in Moreno Valley instead of them moving away when they become successful.  
493 It's close to my work. I love the donkeys and my family and friends live here.  
494 Diversity  
495 The slower pace of life.  
496 city hall

### 2. What do you like least about living in Moreno Valley? (506 Responses Total)

1 Cannot make a life - low paying jobs, high housing costs  
2 Density  
3 The 60 freeway. It's not just problematic during the work day week, but on the weekends too.  
4 The traffic is horrific both on city streets and the surrounding freeways. Not enough outdoor friendly experiences, such as dining, outdoor adult activities.  
5 Despise that many residence consider it acceptable to dump trash and garbage where ever they please. Don't like that the city leader only seem fixated changing land uses to permit warehouses.  
Don't like the heavy financial connection between one local developer and three of our council members.  
6 Traffic, road conditions and poor maintenance. BUT MOSTLY- That the city government wants to ruin our quality of life by turning a significant portion of our open space into warehousing and truck traffic. I commute to work in several areas with high density warehousing that no one chooses to live by. Every one of my friends and acquaintances I know from living in Moreno Valley for the last 32 years do not want this type of development. We want good higher paying industries that we could grow with.  
7 the city council who favor warehouses over clean air, taking away the open spaces and causing

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heavy traffic.  
8 No central downtown area. Would like to see owners maintain their properties better  
9 Warehouses and corporate buildings  
10 Crime, homeless camps, elected officials. Too many people living in the city that have a disregard to respect others peace and privacy, especially loud noises. People living in houses that can't afford weekly and daily maintenance which directly affect property values and attract the wrong type of neighbors.  
11 It's ghetto on sunnymead, around the mall, down alessandro. It's kinda scary and I feel like so might run over someone when they jaywalk  
12 The warehouses are the absolutely worst thing about living in Moreno Valley. They bring more traffic congestion, pollution, not to mention the eyesore they present on the landscape.

13 Crime  
Streets  
Truck Traffic  
City council owned by Benzeevi  
14 The overcongestion of the freeways and major streets and the development of the unsightly warehouses near our housing. We also need to work on revitalizing areas of town in disrepair and address increasing homelessness.  
15 Too many warehouses; warehouses next to homes; truck route on Heacock going past 3 schools where children and parents walk; semi-trucks exceeding the speed limit on city streets; traffic, polluting diesel trucks; a city council that only listens to developers; poor land use planning; too many polluting trucks on freeways.  
16 The crime, lack of adequate police, the MANY warehouses with the numerous trucks, the deplorable streets and the poor choice of good stores and restaurants.  
17 I feel the city does not have a vision of what it's identity will be. right now, it's a bedroom community.  
18 Not enough jobs  
19 I do not like the emphasis on building warehouses.  
20 Commuting a lot due to lack of jobs and construction projects in the City.  
21 nothing

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22 Too busy, too much traffic,with poor road conditions  
23 The pollution, crime, warehouse, lack of action and help getting homeless off private property.  
24 Lack of ECO friendly solutions.  
25 The bias of our city council, planers and staff. The traffic, the noise, the deisel polution. I don't like the priority the developers get that Joe public doesn't. We live here... have lived here... and we are not listened. to.  
26 There isn't enough jobs.  
27 Not enough jobs for teens  
28 High crime  
29 I hate the politically compromised city coucil and staff who cater and show favortisim to those with the most money, those who donate to campains, and whom they let sit on the general plan survey, or other venues where they always favor Benzeevi, Highland Fairview and other rich developeres who don't have any emotional or residential investment, like we do having lived here since Feburary 1984.  
All the poorly made changes in the way warehouses have brought cancer causing desiel emmissions to a thus far unpresidented high. The traffic is clogged further by the big rig trips in and out of our  
Moreno Valley 2040 General Plan Update: Community Survey Report  
47  
city making it impossible to predict when you should venture to the stores to advoid it. This has led to an increase in on line shopping so as not to have to deal with it. Which hurt local small bussiness.  
All the ware houses are doing is bringing down the value of our homes. The automation they use to operate are not bringing in enough jobs despite how loudly the developers tout that they are doing us a favor by bring in all these jobs. Another hug problem is the warehouses are being filled with businesses that are incressing the noice polution with the industry they are. In the NE Moreno Valley the Paper Plant can be heard two miles north and you can't sleep with your windows open at night because it is that loud! Also we are fast becoming a city with more pot shops that any other type of small business. Crime is being increased as a result by alarming numbers. We do

## LETTER

## RESPONSE

not have enough  
police coverage to properly protect our citizens.  
30 Too much crime  
31 We have a big problem with the homeless hope you can resolve it asap  
32 Streets are in horrible condition in a lot of places, especially out on east end of  
town. traffic is very  
difficult on the 60 E and W frequently  
33 Warehouses, pollution, and traffic congestion  
34 Warehouses and pollution, traffic congestion  
35 Gangs  
36 Piece meal zoning, little diversity in local employment, large amounts of traffic,  
blight, and  
homelessness.  
37 Homeless  
38 The Violence caused by gangs and drugs  
39 The transient population, especially around the freeway around Heacock. Also,  
lack of good eateries  
like BJ's and not sprouts or trader joes.  
40 Crime, need a new mall better quality.  
41 To many homeless  
42 All the truck traffic. Too many planned warehouses that will make traffic worse.  
How Council  
kowtows to one developer. Property crime is rising (state laws contribute to that).  
Lack of more  
profession-level jobs (people want to do more than work in warehouses).  
43 Rapid Growth and lack of City Leadership response in kind to increased need for  
Police, road repairs  
and control of high wage of City Manager, Attorney, Finance to Dept Directors all  
earning 6 figure  
wages plus CALPERS.  
44 Not having enough condos  
45 No having enough condos  
Moreno Valley 2040 General Plan Update: Community Survey Report  
48  
46 No defined downtown, lack of west end restaurants, crime, the ghetto areas, the  
city is fragmented  
on multiple levels. Our main shopping area off Day is actually Riverside which  
does nothing for tax  
revenue.  
47 Traffic, crime, homeless encampments, slow police response times, not feeling  
safe in many parts of  
town.  
48 Violence and homeless



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49 What I like least about living in Moreno Valley are the broken streets and homeless people.  
50 What I like least about living in Moreno Valley is the traffic in certain areas. Also the lack of resources for the homeless.  
51 The homelessness is out of control and causing businesses to close.... and homeowners to feel insecure on their own property. It is beyond REDICULOUS the number of panhandlers allowed to infringe on our movement within the city.  
Loitering Not Allowed is a crock now.  
52 Iddo Benzeevi and Nelson Chung and their political bribery used to destroy the city. Too many warehouses in areas that were never intended to be warehouses that are ruining our health and quality of life. Corrupt politicians and city staff who care more about their campaign funds/under the table funding then the residents and don't respond/listen to/or treat residents fairly and equally unless we're Highland Fairview supporters or campaign donors.  
53 City staff and the city council going overboard with zone changes and/or general plan amendment to permit high cube warehouse limiting the opportunity for other industrial uses.  
54 High Crime rates. High homeless population.  
55 Warehouses and freeway congestion. Big rigs driving in residential and local streets damaging city streets.  
56 The homeless community makes our city look ghetto, the lack of bakeries and prestige restaurants  
57 Needs an update/renovation.  
58 Too many warehouses pollute our city with MACK trucks. Also, the fact that the city does not keep up street sidewalks free of weeds. We need more trees in our city. Lots of trees to beautify our city.  
59 Seeing shopping centers/buildings on Alessandro & Sunnymead that are not kept up in appearance, and safety concerns.  
60 a lot of homeless on the city  
61 There is lot Homeless in Moreno Valley in that is not good for are city.  
62 Traffic on interstate 60 is awful. The logistic centers make it unbearable. I suggest that everyone working in Moreno Valley government try driving West everyday from 6:30AM to

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8:30AM

63 The continued development of warehousing throughout the community and the continued increase in truck traffic on local streets and freeways. Traffic is bad enough with adding 80 foot long vehicles to the mix.

64 Too many homeless. Crime rates gone up

65 The pollution and traffic that all of the warehouses have created. Especially out on the east end near the badlands.

66 Truck traffic, no sense of a city center, housing blight, negative impression that Moreno Valley is a place to avoid, huge warehouses is symbolic of our community.

67 It getting breather Crowder and the people's attitudes beginning to change.

68 The traffic

69 The negative people and the pan handlers

70 Lack of Stores and infrastructure

71 its lingering reputation and traffic leaving the city on the freeways

72 Warehouse and homeless

73 Homelessness & crime

74 Homeless population, foot-traffic and less-than-appealing businesses, like on Perris & Eucalyptus

75 Looking for more stuff to do

76 The surrounding freeways are too small to handle the traffic.

77 There is not alot of places/ things to do.

78 Truck traffic

79 Crime rates, careless residents that litter our streets, reckless drivers, homelessness

80 Expensive housing

81 Cultural programs are very limited or non-existent (e.g. film festivals, theater plays, paintings

exhibitions). Crime (drug transactions at certain City corners) and homelessness are increasing

82 All the warehouses and big businesses being forced on us. I also live in the NE end of Moreno Valley

and had always looked forward to living in a desirable area. Now I don't like where I live because of

all the warehouses that have been built and will move away after living here over 35 years now. If it

gets worse.

83 That our city wants to build the largest warehousing empire here. Also, crime in the city. Lastly, lack

of good grocery stores. I miss Ralphs and mostly go to Riverside to shop.

## LETTER

## RESPONSE

84 To much trash on streets cops don't give out litter tickets when they see cars  
dump trash on roads

85 hear/see a lot of crime in neighborhood apps/news

86 The homeless population walking around the city, make our city look ghetto

87 The lack of jobs and vision to move our city to the next level.

88 lack of jobs and lack of places of family entertainment

89 The crime, and lack of jobs/entertainment

90 Losing the open space feel of the city, traffic congestion and cookie cutter  
shopping centers.

91 Few well paying sustainable jobs.

92 The crime and school system.

93 Too many warehouses and trucks at my end of town already (east end) where the  
last general plan  
had manufacturing and half acre home sites.

94 Warehouses enveloping the City...  
Traffic increases on City Streets,  
I-60 and I-215... Increased Warehouses will significantly exacerbate this issue (See  
EIR,  
Transportation Annex for World Logistics Center)...  
Further, the timely repair of streets is unacceptable and shoddy (maintenance rarely  
includes full  
recovery and rests solely by filling potholes in patchwork fashion).  
The timing and coordination of street lights has been discussed and touted in the  
past... Yet, no  
effort exists to fulfill this dream for easier commutes.  
The response by City Hall and elected officials always seem to be odds with the  
Will of its Citizens.  
Pandering for self rewards, nepotism and allied positions of boards (i.e. School  
Board, etc...) create  
enmity with residents, who only see political connections with developers as more  
important to  
Council Members. Which leads into another issue of insufficient DIF' (Developer  
Impact Fee's)  
being assessed during the EIR and build out process by Commercial and Residential  
developers...  
sufficient to pay for street, street lights and traffic signal improvements and repairs.  
Provide no more huge 'tax breaks' for projects like Amazon (For example the City of  
Houston gave  
Amazon a \$35 Million incentive to open their Fulfillment Center!)...  
Question: Exactly, how much did the City of Moreno Valley give away in taxation  
(DIF's for standard  
improvements) ??

95 Not enough adult /family entertainment or ,nice restaurants to frequent in the

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area. Very limited. The existing shopping centers are half empty or vacant and still more are leaving. The Moreno Valley mall is pathetic!!and also half empty. Too vacant buildings on main streets. My home is here but I must leave the city for everything else.

96 The short term planning and lack of vision and a failed logistics economy. The reputation Moreno Valley has of "developer driven"

97 It is growing to fast. We are seeing the fast paced growth of Home's being built which we still don't need as much of as they just sit and it attracts negative activity. Also too many warehouses which means a lot of smog and also a headache of traffic on side streets that are also used by our local Donkey's and Driver's have no respect for their right to live we see baby Donkeys being killed in large numbers . More traffic means more speeding.

98 littering

99 Traffic with big rigs/semi trucks. Crime seems to be going up.

100 Traffic

101 There's an influx of homelessness which I do not like never seems to be enough police officers we need our own police force

102 Distant from most places I like to go to like Pasadena, LA, Coronado.

103 Alot of rift raft with new people moving here

104 Increased eriminal activity! We don't go out after dark unless emergency. The traffic is ridiculous! Too many massive, insanely large concrete complexes just makes it worse!

105 Increased criminal activity! My husband & I won't go out after dark unless an emergency.

106 Traffic is starting to become like a metropolitan area

107 Lack of employment paying enough for those employees to purchase a home here in Moreno Valley

108 There are no city incentives for home owners to help with water efficiency, electricity, classes, etc. In Riverside they give you free classes, even a free tree, free computers to qualified residents, etc.

109 Traffic lack of facilities for kids

110 Traffic, homeless issue, drug use in the city, no upgrades to building off Sunnymead Blvd.

111 The warehouse economy is a blight on our community. Their diesel trucks cause health impacts to

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many and especially to the young/elderly in our non-attainment area.  
There are too many diesel trucks that pass schools and the paths students take to schools on City designated truck routes and elsewhere.  
Warehousing is not reducing commute times, but adding to the clogged SR-60 with 1,000's of truck trips.  
Warehousing is becoming more and more mechanized/automated. Our City is designating too many acres to what will become fewer and fewer jobs.  
Most of the warehouse jobs are not the type we want our children to aspire to because they will be replaced with automation, they are around toxic diesel trucks all day and are not earning family/homeowner salaries.  
112 Not getting a response when I call and report various problems like illegal dumping and abandoned shopping carts.  
113 All the warehousing, with the resultant increased truck traffic and diminution of quality of life. Air quality is getting bad, and both freeway and surface traffic is dreadful.  
114 Homeless, crime, begging  
115 Basically everything else. Lack of homes available for purchase, lack of jobs that pay well, lack of good food.  
116 crime rate increases  
117 The Traffic on the freeway and side streets along the freeway; the Distribution Centers; the type of businesses coming in - so many car washes popping up, more fast food restaurants than nice restaurants. Job Opportunities that pay a living wage for a family. And, as everywhere, the cost of apartments and rentals - people are paying more in rent than I pay for a mortgage with property tax and insurance.  
118 Increased amount of homeless population  
119 I've been here 30 years and the place looks dirty. They don't keep up the city of Moreno Valley we have trash homeless. Streets are horrible same goes with the freeways.  
120 I do not like the number of warehouses being built in our city. With warehouses comes big trucks, with trucks, there will be more pollution in our air. The air we ALL breathe, making it unhealthy for

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us ALL.  
121 Too much traffic  
122 Warehouses and excessive trucking  
123 Heat  
124 The class of people. To much homeless. To muck thievery. To many gang bangers.  
125 Crime, high property taxes, homeless everywhere, a million warehouses clogging up roads with semi trucks.  
126 The homeless population has sprouted out of nowhere and has made it unpleasant to just look around, go shopping, go out to eat, and just do life. I think MoVal really needs to focus on providing for the homeless and actually taking action to connect them TO those services. Possibly having law enforcement move them out of the locations they are currently in.  
127 The crime  
128 The crime that has gone up and disrepair of the roads, illegal trash dumping , I live in Rancho Belago area  
129 Traffic, ugly abandoned buildings, trash, lack of cultural points of interest, poor quality schools  
130 The condition of our roads and all the warehouses.  
131 The logistics buildings everywhere and the low income families everywhere which then make up most of the crime in moval.  
132 It is not known to be a safe city in terms of youth crime, or bullying in schools. The employment opportunity for graduates of higher education doesn't seem high.  
133 The corruption in city hall.  
134 Currently the town lacks ownership in my honest opinion. The homelessness in this city has reached a sky rocketing amount and nothing is being done about. Our beloved Sunnymead Boulevard is now the homeless breeding ground. Sunnymead Boulevard used to be our towns pride and joy.  
135 Over crowding, overloaded 60 freeway, increased truck pollution, warehouses, threats of changing original zoning, loss of rural feel, city fees and utility taxes, corrupt politicians', homeless from OC, illegals treated better than citizens, unsafe environment, outrageous utility rates, many roads in disrepair.

## LETTER

## RESPONSE

136 I don't like how Sunny Mead Blvd. Looks very dirty, unsanitized, not family friendly at all.

137 Low income housing that attracts individuals who blemish the positive image of our diverse community.

138 Safety, homeless and street conditions  
Some areas looks pretty bad (lack of house maintenance)

139 Traffic

140 Crime. Traffic

141 Homelessness  
Negative PR

142 I'm afraid that soon the quietness and the wild life will all go away once the big warehouse are built.  
More big 18 wheeler are using Redland Bly as it is now, also the traffic on this treet that connect to  
Loma Linda is bad it is terrible

143 Homeless issue, crime, a lot of warehouses but no restaurant and mall needs to be cleaned of up.

144 The roads, the lack of cleaning in the city. I would like to see more pride in the city. Cities like Murrieta and Temecula should give our city the roadmap to success to achieve that.

145 The conditions of the roads, the lack of police, and the number of warehouses being built everywhere.

146 All the trash you see around the city the criminal activity. Most streets are to dark to walk at night.

147 Getting too crowded.

148 Crime, politics, City council, lack of industry

149 Crime. Lack of big name restaurants. Condition of the streets. Traffic.

150 The crooked city council, warehouse encroachment, high density housing, horrible road conditions

151 Everything is so far away. We need more upscale restaurants on the east end of the city.

152 Crime and criminal having more rights, way too many apartments

153 The corruption in our administration in the city. Too many distribution centers. A really high level of crime. Not alot of shopping or eating places on the east side of town

154 I especially do not like code enforcement! People been using it as a personal vendetta against other residents ! Tired of the politicians! They come here get rich leave and the old timers stuck with the wrong laws ! Utilities being taxed is wrong asking seniors and vets for school tax's wrong! I lived here and I see the favorites get away with so many things ! People renting out

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houses and tax free !  
No ordinance's and people on private residence stuck with trash and music a cars racing ! No one stays ! And I'm still here being harassed by city ! No one to help ! My husband is a Vet and we are old with many health conditions ! More warehouses will cause more health issues ! Unhealthy air to breath! Seniors being attacked . Scared to walk the streets ! House insurance difficult because of area ! Car or house insurance ! To many problems! Everyone out for themselves ! Mixing personal politics with running a city ! Schools kids attacked and unsafe! No one cares to much hate and disrespect! Especially from mayor what an example to the youth in the community! Disgraceful !  
155 Traffic. That one man controls the city council. Property crime (mail thefts, property thefts) as reported by friends and social media contacts.  
156 The potholes, crime & violence  
157 Mayor, city council, police, crime,  
158 Traffic  
159 Lack of Police to protect our city  
Crime , gangs & homeless . It's out of control. Why did the city agree to pay for LA gang members in prison to house there families in Moreno Valley. If prisoners were released they should of had to move elsewhere. Out city has turned to crap.  
160 Crime, homelessness, lack of large businesses for employment  
161 School district is bad  
162 Homeless  
Fast drivers  
ALOT of accidents  
163 Lack of African Americans working in the businesses.  
164 Too much crime, very few police  
165 The crashed brick walls that don't get repaired. Walls to low from house to street. The homeless.  
166 The traffic to get to Moreno Valley  
167 Too many one-sided politicians  
168 The increased vagrant issues  
169 Roads and truck traffic  
170 60/215 ridiculous traffic problem. Also truck traffic created by logistics buildings not only in MV but general area as well.



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171 Littered streets and homeless people.  
172 The traffic and crime  
173 The rising crime rate.  
174 Lack of higher paying jobs and multiple warehouses  
175 It's high crime  
176 The gangs and crime! City looks like we don't care, trash, overgrown, bad roads  
177 Traffic  
178 Warehouses  
179 Homeless crime  
180 Traffic, roads are shit!  
181 The homeless population has increased and so has the amount of thefts and killings.  
182 Crime and doesn't seem like the city has a plan. Poor roads, street landscaping  
183 Not enough restaurants or entertainment activities for such a large city.  
Residential roads are not serviced. Too much traffic on local freeways  
184 The amount of homeless people living on the streets.  
185 Crime, lack of opportunities, poverty, bad schools...  
186 that the politicians have been purchased  
187 I've seen the city go in a less pleasing direction by allowing our roads to look bad and the homeless situation not being addressed. It makes our city less desirable to those looking for a place to call home.  
188 Never see patrol cars on streets keeping citizens in check  
189 The city's lack of community outreach. Lack of homelessness control and transient control.  
190 Traffic  
191 Prices going up on rent.  
192 Underdeveloped commercial businesses in Rancho Belago  
193 First and foremost the industrial building everywhere!! Most are empty yet they kept getting built.  
Makes our city ugly!!  
Very close second, The crime! The lack of police patrols and response to crimes are maddening.  
There has to be a death involved before the police will show up.  
The homeless problem needs to be addressed. It is becoming out of control.  
The drugs and trafficking issues is not even being addressed.  
I have lived here 25 years, please don't make me leave this city I call home.  
194 Traffic  
195 How Moreno Valley is allowing big buildings to be built. Is making Moreno Valley be a commercial

## LETTER

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place now.

196 Crime, surging number of homeless people, congested roads, truck traffic 24/7

197 Corrupt government officials at City Hall, specifically the city counsel. Crime.

198 The lack of police and how dangerous it can be sometimes

199 Our air quality is terrible and crime being prevalent

200 Homeless Population Rising

201 The amount of homeless people around businesses and in the streets

202 Crime and lack of options when it comes to shopping and restaurants

203 The lack of community.

204 All the crime, homelessness, how the city is deteriorating.

205 High property tax

206 How big it is getting. How many abandoned/unused warehouses there are. The main streets like

Alessandro by perris and the library library needs repair. Potholes.

207 There is no longer anything pleasant about living in Moreno Valley. I've lived here over 20 years and

I've seen how the choices made by our city government have ruined this city.

208 The smog, pot holes, driving into Moreno Valley on Alessandro and old 215 and the area ugly. I would

love to see more trees and plants.

209 Car Accidents and theft

210 no real entertainment or night life for the adults other than bowling or the movie theater also no

attractions or destinations places for people to want to come to this town to spend time and their

money. Too many low paying warehouse jobs.

211 The violence

212 It's becoming more ghetto and so many stores look ran down.

213 No downtown

214 Homeless and ghetto people that live here.

215 No real downtown with walkable shops

216 Crime, homeless and all the warehouses that keep getting built!

217 I don't like the increasing population as it creates more traffic and business delays.

218 The homeless

219 Homeless and warehouses

220 Rising crime

221 Homeless, crime, trashy

222 The condition of the streets is very disappointing as a citizen to drive and see so many pot holes just

patch them that doesn't work to fix the problem the streets need to be paved with asphalt. Stop signs

and markings need to be re done near school crossings. Another issue I don't like

## LETTER

## RESPONSE

are the homeless  
in Sunnymead they need jobs and mental health help not hand-me downs, they  
make sorry to say a  
lot of trash with the shopping carts, trash on the street near businesses which in turn  
makes the city  
look dirty and un kept.  
223 The logistics center and all the trucks  
224 The mall, homelessness and nothing fun to do.  
225 Traffic  
226 The crime rate.  
227 Crime. Homelessness.  
228 The crime, the giant distribution centers, the people who migrate there that  
aren't family oriented.  
229 1. High crime: homicides, auto/store theft, burglaries  
2. Low police presence  
3. Roads are falling apart from the excess big rig /vehicle traffic due to warehouses  
4. Homeless driving away businesses  
230 The gangs and homeless, the ghetto spreading all over the city and into all the  
neighborhoods.  
Allowing Section 8 housing everywhere.  
231 Crime, traffic with no improvements to streets to help congestion. Schools over  
populated, not  
enough access to high rated schools.  
232 Water  
233 Homeless people in the plazas and a lot of thieves  
234 All the crime  
235 That our crime rate is going up and we need to send out more gang units to  
make the public feel safe  
like in 04 when I moved here. As well the traffic there is now on every street.  
236 Crime.  
237 Crime rates  
238 Crime. The dirtiness. Less options for things  
239 The Homelessness/ Transients, Also All the Empty Lots / Businesses That Are  
Going Out of  
Business....  
240 Too crowded = traffic!! Low income residents, homeless, businesses leaving,  
not enough police, too  
many houses /apartments and not enough grocery stores and eateries to  
accommodate, etc...  
241 Nothing yet  
242 Few amenities  
243 Crime / growing homeless presence  
244 Not enough police presence

LETTER

RESPONSE

245 Homeless and crime  
246 crime, schools, potholes, not a lot of job opportunities  
247 Crime and feeling unsafe  
248 Warehouse and traffic on Hwy 60 and in Canyons  
249 Traffic  
250 To many homeless I don't always feel safe.  
251 Needs more inversion, security.  
252 the exits, they are the gate way to our community and the landscape looks horrible. The trash, the tents. Also, the lack of better restaurants and shopping  
253 All of the warehouses scattered everywhere, increased traffic on Hwy 60 and in the canyons, city council that seems to ignore residents.  
254 To much crime and homeless  
255 Overwhelming amount of vacant business.  
256 Semi truck traffic  
257 City needs a facelift and more police.  
258 The crime in Moreno Valley and the schools  
259 Crime  
260 Vagrants, drugs and criminals  
261 The crime and the lack of cops. They also do illegal races and that it very dangerous. I have two small children and a lot of parents say the school district is no good here, I am scared of how the school system will be once they enter school.  
262 All the homeless and leaving trash throughout the city  
263 60 fwy  
264 -crime on a lot of areas, people here will steal your plants from your front yard -trash everywhere -poorly lit streets -aging roads  
265 The naysayers that always have bad things to say about all the programs and progress the City has made.  
266 Homeless people and vacant buildings  
267 Too many ghetto people wondering around. Alot of crime  
268 They close down a lot of businesses and don't build anything we like.  
269 Crime.  
270 There are a lot of ugly areas. Homelessness. Trash in streets and parking lots. Not many shopping/dining options. Schools and bullying is a problem.  
271 Schools are not providing equitable education n standards  
272 Lack of better quality restaurants, retail and grocery stores, a lot of run down

LETTER

RESPONSE

areas of town-not only residential but commercial too  
273 The homeless population. The trash along the highways. The roads that are very bad. The bullying in the school system. The lack of respect by neighbors to be respectful to their neighbors with parties and loud music until the early mornings. The police/sheriff not having enough time to come out in a timely manner and give fines to make the neighbors do the right thing. The lack of nice restaurants, culture-music, art, available. The trash that has been dumped and left by the hills and side roads.  
274 Moreno Valley Matters Facebook page. Theft, Too many homeless camps.  
275 The homeless problem is getting bad... it's scary at night in some areas... that's not exclusively Moreno Valley though  
276 The overwhelming Hispanic influence and preference most everywhere I go. Not enough black employees in public places.  
277 Certain parts are ghetto and not well kept. Not enough decent restaurants and parks are too small.  
278 The homeless and thefts.  
279 The residence brick fences near VISTA DEL LAGO HIGH SCHOOL. When the graffiti is covered on the walls the color of the paint does not match. This brings down quality of my neighborhood and I am embarrassed when I have visitors. It shows the workers and city council cares less about the community. If the City Council person lived in this area and had to see it everyday they would be embarrassed when they have visitors. It is a shame and the City is showing a message that there is no community pride. Clean up the landscaping of the freeways and shopping areas. Do something to fortify the mailboxes to stop break-Ins. The 60 fwy is an introduction to our city and it is not inviting. The landscape look cheap and unattended.  
280 Not enough dining  
281 Population growth and traffic are growing to fast  
282 Warehouses  
283 Crime, roads not taken care of, traffic issues not resolved  
284 The condition of the common areas surrounding many of its communities. The

## LETTER

## RESPONSE

sprinkles systems in most of them don't work. Those places are bare and are an eyesore because they are without plants.

285 Lack of culture and entertainment

286 freeway traffic

287 Notice lots of drugs at schools and crime has been rising. Do not see enough police to tackle this two main issues.

288 The access is again getting cut off due to developments to the east and south of the city. Pigeon Pass Road needs to be developed to Riverside since Reche Canyon is already over capacity.

289 Crime, No Good Restaurants, No Shopping, No Activities

290 The crime, the potholes, and the areas that can look better.

291 The decisions that the city has made to bring warehouse and increased traffic to our area. The mayor and city council no longer value the health , both physical and psychological, of our residents based upon the type of business growth and residential zone changes they promote.

292 Warehouses taking away what is most livable here

293 1-tons of trash on the streets & freeways

2-the town is boring, not much to do

3-homeless everywhere

294 Traffic is getting worse. I am seeing more graffiti

295 HOMELESS, trash, unkept roadsides and highway exits.

296 The traffic is getting really bad. Very difficult to get to Riverside or San Bernardino on the 60 Freeway

297 Fireworks issue - Need a task force, Loud Party issues, people parking cars on lawns, business trucks over the weekends and some on the lawns, obvious broken down cars (doors off etc) in driveways.

Loss of Staters Bros in the 92553 area leaving just Food for Less and misc Hispanic stores. Winco is great but the one that was planned on Alessandro and Lasalle area never happened.Lack of a downtown or center of town. City Hall and Auditorium area of Alessandro will be great, but it looks like you are moving forward putting Warehouses on Alessandro. Lack of rules wehre these large trucks can drive!!! they should not be on streets like Stacy Lynn Dr, Mangowood and Black Walnut.

Not in the housing corridors!!! Lack of cross walk and traffic control a journey

## LETTER

## RESPONSE

school on Kitching and  
Alessandro. Need a crosswalk at Black Walnut, need a no stopping or parking curb  
from the gate to  
Black Walnut can't see to pull out for right turn let alone a left. Black Walnut and  
Mangowood should  
be no turn or use during the school hours. Residents only. People park crazy at the  
Kitching and Black  
Walnut. Dangerous people flaying through from Mangowood to Black Walnut.  
Have almost been hit  
several times when backing out. Need Speed bump around the mailbox area. Kids  
have been in  
street playing when idiots come flying around the corner. Building more stores  
when so many are  
empty and should be torn down and rebuilt. City beautified the Sunnymead Blvd  
Street, but the old  
businesses need help in upgrading the face to make them look nice versus trashy.  
Look for grants to  
help these small business do improvements  
298 Too many people, too much traffic.  
299 The traffic, smog and warehouses.  
300 It's a little too conservative at times. A community can support it's military  
roots without shunning  
it's liberal, forward thinkers.  
301 Increasing traffic and streets are in disrepair. Traffic jams at all hours of the day  
now. Hard to get on  
the freeway and when you do it is backed up.  
302 Price of homes  
303 Housing cost and traffic  
304 it's becoming another warehouse dominated city, like Ontario, especially once  
the logistics center  
emerges. The roads, especially in the eastern city are terrible; and will get worst  
with more  
warehouses.  
305 Warehouses and trucks. Not good for our future for good middle class pay,  
pollution and truck traffic.  
306 Crime, losing neighborhood trees, SR60 congestion  
307 Theft  
308 Paying for illegal aliens.  
309 Breathing unhealthy air and the proposed huge warehouse complex which is  
projected to generate  
an additional 14,006 truck trips a day into our area that already has the second worst  
air pollution in  
the Nation.

## LETTER

## RESPONSE

310 Nothing  
311 The city streets (generally speaking) are ugly, dirty, unlandscaped.  
312 Homeless people asking for money, roads needing new asphalt, and 60 fwy traffic.  
313 I feel like the city doesn't have enough activities to participate in during the summer.  
314 traffic  
315 the violence home robberies and mailbox theft  
316 How much the city has deteriorated over time. In the last 20 years there is so much more visible  
homeless, vandalism damage, retail theft, mail theft, etc.  
317 The warehouses and traffic caused by them  
318 Crime  
319 What I like the least is all the trash/debris I the streets, roads and freeway. And that the roads have  
no paint like a "stop" signs and their is potholes.  
320 Crime, homeless, slow police response  
321 Traffic. Only 2 lanes for 60 freeway.  
322 Crime  
323 Pot holes  
324 Crime  
325 Crime, homelessness  
326 I don't like that we are becoming better known for violent and property crimes. I don't like how  
people seem to feel they can drive how dangerously they do because they fell, or know, that we don't  
have the police support to cover the city. I don't like that the Rancho Bellago Walmart has more  
product locked up than any other Walmart I've ever been to. This is supposed to be groomed as a  
nicer area but you won't draw people to this side if crime is rampant. I feel I shouldn't be out after  
dark and sometimes even during the day. We need more police.  
327 Too many people, too much traffic  
328 Insecurity when assaults happen, robberies and car speeds. A lot of potholes on the streets.  
329 Warehouse construction is causing more tractor-trailers on surface streets. Traffic is already a major  
problem and the roads are full of potholes. No good paying jobs and terrible school system results in  
homelessness and crime.  
330 Drug addicts on the sidewalks and homelessness.  
331 crime, trash. Low socioeconomics.



## LETTER

## RESPONSE

332 Crime and maintenance of streets and spaces

333 There is a very big lack of professional office space. Most professional space is converted homes.

Professionals like office buildings. The city does not tap into its natural resources as a selling point.

Too much focus on warehouses diminishes the perception of a place to live and raise a family.

334 Crime

335 All of the crime activity that goes on now. You can't get a police officer to come out and do anything.

And the people that have moved in here don't care what their houses look like in some areas and like

I said before, we have a lot of riffraff here now gangs and crime has skyrocketed

336 city tax, stop signs where yield signs would be better

337 Traffic going in and out of Moreno Valley is way too congested.

338 Most of the jobs here are low paying warehouse or retail/service industry type jobs . There are not

any high tech jobs available here as far as I know. If our city would attract high tech industries that

would be willing to train our citizens, the result would be that wages would go up, consumer spending

would go up, more tax revenue would be collected, and our city would greatly benefit.

339 I don't like the amount of semi trucks clogging up the local streets that I must use to have access to

literally everything I need to do in the city (go to work in town, grocery shop, gas stations, etc.) I really

do like the lack of landscaping of any kind surrounding the housing tract. I've talked to the city about

it a couple of times, and it seems that, while our entire development that is north of Gentry pay our

share of taxes towards landscaping, we were not included in the proper plan between the city and

the developer back in the 80's. So, we are actually paying for the southern section of the tract. I'm

also not happy about the number of "taco vendors" popping up in the empty fields near my home.

Personally I feel they should have to comply with Dept. of Health codes like the restaurants in this

city do.

340 Homelessness

341 Not enough trendy restaurants, clubs, bars and boutique niches

342 Older areas are run down and not kept up. Too many pet owners are not

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## RESPONSE

cleaning up after dogs when they walk them. I wish there was a way for the city to enforce this.

343 The amount of violent crimes, the lack of upkeep of the streets, and lack of street lights. I feel that Moreno Valley cares more about the Large businesses (warehouses) and less about the members of the community

344 The homeless and trash everywhere. Have lived here over 30 years and it never was this bad before

345 The homeless

346 Traffic on 60fwy

347 Crime rate

348 Gang violence and naughty activities of some people.

349 Crowded and crime

350 Crime, homelessness, drugs and poor school district.

351 Too much violence, gangs. Too many warehouse.

352 Rising crime

353 best paying job in Ontario-have to commute

354 Potholes and poor upkeep maintenance of streets and roads

355 Most jobs require commute...

356 The schools in the city are very poorly rated.

357 No entertainment. It's boring. Not enough trendy or mainstream eateries or higher-end restaurants, no fun things like race tracks, fun centers, or things of that such., starting to have too many warehouses, and the growing aggressive homeless communities especially near shopping centers and gas stations feel unsafe, crime and theft, wish things were cleaner and more aesthetically appealing.

358 traffic

359 freeway is to small and it seems city funds are going to areas already developed.

360 The crowds coming through San Timoteo canyon impacting the poor farms in the area. These rural pathways are being abused because their are not that many exist for the city. Creating major traffic jams causing safety concerns. For example locust and redlands needs a stop sign or light due to heavy traffic early mornings and afternoons.

361 The lack of amenities such as restaurants and shops.

362 The crime &homeless. Having no white table cloth restaurant/bars on the east side of Moreno Valley. There should be higher end restaurant on the east side.

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RESPONSE

363 traffic and crime  
364 The rising crime. Areas that are filled with homeless and vacant abandoned houses. That there are no central plaza areas to walk around at while feeling safe. Something akin to the Mission Inn in riverside or Victoria Gardens or Downtown Redlands.  
365 It is rapidly growing and city officials cannot keep up with all of the community's demands, especially in the eyes of our elders who lived here before paved roads.  
366 heavy truck traffic from logistics warehouses  
367 Crime  
368 High crime rates, homelessness, over priced homes, barren stores/empty, lack of city involvement to decrease homeless issue and crime rates.  
369 Have to travel for concerts and work.  
370 I wish we had more spaces for the arts, outdoor activities (skateboarding, parks, etc) a community theater. Also we need a big baseball complex with a bunch of fields.  
371 The crime rate, homeless problem, streets have potholes everywhere, traffic is getting worse, and there isn't much to do here.  
372 Roads  
373 INCREASING CRIME. LOW WAGES INDUSTRIAL DEVELOPMENT. LACK OF PUBLIC TRANSPORTATION WITH SURROUNDING CITIES.  
374 Crime is on the rise and the police force is not big enough to combat it  
375 traffic, crime  
376 The rising crime rate and homelessness.  
377 Traffic.  
378 Lack of things to do. Too many suspicious people or panhandlers from other areas.  
379 The lack of feeling like there is a central space (a downtown) or where our city begins or ends.  
380 Traffic on the 60/215  
381 The gang aspect and crime. Our area was virtually crime-free up until about 2 years ago when mail theft and vehicle break-ins began.  
382 The lack of enforcement of City codes and ordinances.  
383 No big business anchors or restaurants. We should have a restaurant row.  
384 I don't like how dark it is at night. Most of the roads do not have street lights. The roads need repairing such big holes in the street.  
385 Freeway traffic...only 2-3 lanes

LETTER

RESPONSE

386 All the low class people and lack of ammentities  
387 too many homeless  
388 Crime, dispensaries coming into the city  
389 Lack of in-town activities, restaurants, parks, etc.  
390 Low end stores with factory like warehouses  
391 There is only a two lane highway in both directions (60) and they are trying to put in more warehouses which would clog up the roadway even more with diesel trucks. It seems as if they want to create jobs, but it is the wrong kind of jobs. With cost of living going up and the quality of people moving into Moreno Valley get better, we need more higher paying jobs like medical, tech, and other revenue generating higher end jobs.  
392 Traffic  
393 Traffic and the pollution it causes.  
394 There city's infrastructure needs upkeep.  
395 Crime and development expanding in our area. Strip Malls bring in crime. Homeless people.  
396 Traffic  
397 Homeless, traffic  
398 It appears to becoming a city of warehouses.  
399 Cost and traffic  
400 worsening air quality due to a significant increase of trucks that now roam our city  
401 Crime  
402 I dislike all the traffic and air pollution the warehouses are generating. It is making the city an unhealthy and undesirable place to live.  
403 warehousing  
404 Homelessness  
405 The proposed World Logistics Ctr with all the warehousing generated trucking.... it is a ridiculous number of square footage in all.  
406 The growth of our Warehouse facilities. If the NE continues to grow into a Warehouse community from Redlands Blvd, East for several miles and to Lake Perris I believe the property values will decrease. A tremendous amount of noise from Trucks and Cars. We will no longer have a quiet community. Several years ago a Medical Training School was scheduled to be built at March ARB but we don't hear about that now.  
407 Sunnymead Blvd, the disgusting buildings and meth addicts

LETTER

RESPONSE

408 poor police homelessness potholes  
409 Homeless and trash everywhere else.  
410 High crime and the rundown appearance of peoples homes ex. non running cars,cars parked on what should be a lawn, front yards with couches,pallets and other junk.  
411 traffic, crime pandering politicians  
412 Worst air pollution in the country. Worst traffic in the nation/state. Worst career job development.  
Very bad schools which has led to an increase in poverty.  
413 Terribly kept landscape, homelessness, and poorly kept community  
414 People to many  
415 Schools are not highly rated and the crime rate.  
416 The ware houses going in, bringing tons of truck traffic. I now get off on Indian when driving home from the south because of all the congestion caused by the trucks.  
I hate how there seem to be no traffic control going on - people speed up and down residential streets  
417 All the shopping centers in town need a revamping, including that poor mall.  
418 Hate the growth of traffic on major freeways to west and south.  
419 Warehousing and industrial parks  
420 Crime is on the rise again. I have been in MV 26 years and I see that the decision-makers are turning a blind eye towards crime.  
421 More and more crime springing up in the area  
422 Appearance of neighborhoods, neglectful property owners.  
423 road conditions  
424 the building of all the homes when there are vacant homes that should be sold.  
425 Those who control our city government are beholden to Iddo Benzivi (sp?). Decisions are being made that benefit him, not the community.  
426 rampant homelessness  
427 how the city leaders cater to a developer and ignore the voice of the citizens  
428 Crime, businesses not being kept looking modern or up to date  
429 Taxes, trash, crime  
430 All the extra traffic in the past 20 years. And no widening of the bridge on Moreno Beach and the freeway.  
431 Homeless, crime, potholes  
432 freeways and traffic are getting sooooooo bad  
433 Lack of police presence.  
434 The ugly warehouses, the crime, and the city plan doesn't reflect the needs of all it's locals.

## LETTER

## RESPONSE

435 The traffic has gotten ridiculous.  
436 Warehouses and truck traffic  
437 Industrialization  
438 Warehouses and logistic trucks  
439 The onslaught of deceptive leadership at city council. From their rezoning of districts to their push of warehouses on it's citizens.  
440 Gangs  
441 The warehouses and constant truck traffic and crowded freeway  
442 The freeway traffic  
443 The big warehouse are ugly and bring more big truck which makes traffic and air unsafe.  
444 Warehouses  
445 Big buildings and truck traffic.  
446 The truck traffic, the increased pollution caused by warehouses; the impossibility of getting in or out of town much of the day due to traffic  
447 Traffic  
448 What I like least is all the warehousing going up in the city. The crowded freeways and all diesel trucks coming through to the city. The undone roads and damaged roads. A lot of the city roads have pot holes and are not fixed. The roads are also over crowded.  
449 Warehouses, traffic  
450 I don't like the increase of trucks going thru Redland St. The 60 fwy a 2 lane for east and west bound.  
60 fwy must be widen. Keep the warehouse south of the freeway.  
I think all the warehouse and truck will destroy out quality way of life.  
I have seen the difference all ready. We have live here over 15 yrs.  
451 The crime, theft and burglary are out of control. The quality of the streets are poor. The traffic lights aren't timed correctly. Traffic laws aren't being enforced by evidence of the nightly street racing.  
452 Warehouse encroachment, dense housing, homelessness, traffic, lack of job diversity, lack of higher education opportunities, poor road maintenance.  
453 The high traffic and the bad reputation  
454 That the city is trying to build warehousing on the north end which will bring many more diesel trucks.  
455 The cities failure to curtail truck traffic (through and along side of residential and school locations)

## LETTER

## RESPONSE

to and from warehousing facilities that have close access to freeway routes.  
456 Pure and Simple. The WAREHOUSES. THEY ARE EVERYWHERE now and it seems like a new one goes up every week. This is not LOS ANGELES. That's why people moved out here. Warehouses bring pollution, traffic and swallow up all the open land. NO MORE DAMN WAREHOUSES!!!!  
457 Old buildings  
458 crime, violence, and inconsiderate (yes) Minorities buying into our neighborhoods AND lowering our property values through neglect and more crime and violence. Moreno Valley Code Enforcement is NOT doing its job!  
459 Crime, rudeness, traffic  
460 Becoming congested - traffic, especially trucks.  
461 the awful traffic especially the 60- 215 merge  
462 A City Council that illegally disregarded State environmental laws when it rushed to approve a massive warehouse project that is projected to generate an additional 14,006 truck trips a day into our area that already has the second worst air pollution in the Nation.  
463 Many streets with potholes; some areas are not well maintained showing no community pride; no central downtown area or community center;  
464 Warehouse buildings and World Logistic Center plan. Diesel truck traffic  
465 Industrial buildings across from residential housing.  
466 What I like least about living in Moreno Valley is the fact that Iddo Benzeevi, by spending millions of dollars on false and misleading mailers during election time, has been able to elect three of the five members of the city council who ALWAYS vote for what ever it is that he wants. The approval of WLC was a complete sham and remains so! Now, the city has appointed not only Benzeevi, but his crony, Chung, to the General Plan Advisory Committee. Really? Two developers lining people's pockets with money so they can do what they want? Such wisdom!! I know there is corruption just about everywhere at the local level, but the corruption in Moreno Valley is known, and laughed at, nation wide!!  
467 Crime  
468 Nothing to do other than go to the mall, Johns Incredible Pizza (this one

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considered in Riverside),  
Chucky cheese, Shakey's, we have big auto mall but no nice restaurants or family places.  
469 The potholes and there's no Trader Joe's . They need more jobs so I don't have to spend hours in traffic.  
470 Not enough parks and crime it is too high.  
471 Commuter Traffic  
472 Too much crime  
473 The lack of significant progress in putting substantially greater numbers of law enforcement officers on the streets, including patrol and traffic enforcement.  
474 Constant traffic on the interchange that makes getting in and out of Moreno Valley more difficult than it should be.  
475 Abundance of warehouses especially empty ones.  
476 traffic and crime  
477 The traffic travelling to & from work.  
478 Disappointed with too many closed stores  
479 Increase in crime  
Personally affected to high rise of theft  
480 The traffic is terrible on many of our arterial streets. I would love to see projects that convey traffic more quickly through our town by better traffic signalization and better access to freeway on-ramps.  
481 Crime. weed and sidewalk rubbish control. Lack of business incentives for retail, restaurants and major residential single home developments  
482 The city is getting crowded, and we need more affordable housing.  
483 Homeless and crime  
484 I live on Goldenchain St in Moreno Valley and there have been a lot of homes for rent in my community. I don't mind renters, but we have some neighbors that are renting and they have about 15 to 20 cars all around our neighborhood because they sell cars from their home. This is really not safe for the community. I also noticed more homeless walking around the community and I noticed more trash everywhere, as well as small theft like breaking into cars.  
485 I don't like that we have a bad reputation for all the crime that occurs. The crimes that happen here, happen everywhere else too. For some reason people just focus on the negative. I also don't like that



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we don't have that many recreational activities.  
486 There is nothing out here but warehouses and the same fast food places.  
487 Traffic on the 60! I don't think it's going to get better in either direction.  
488 Lack of entertainment options such as outdoor entertainment and food halls.  
489 Some areas are run down and could use a refresh  
490 Homelessness and no cultural activities or community involvement  
491 Potholes, deteriorated roadways.  
492 Too many homeless people and no one is helping them  
493 It is not walkable  
494 Not much opportunity for creatives  
495 Working for YT Dreams, etc.  
496 The criminal elements, the extremely bad drivers everyday running red lights, the lack of parking space for parents who are picking up their children from schools (city if you're building a school, include a parking lot for parents to park in so the streets won't be crowded, double parked, making turns).  
497 How many parts of the "old" city are so out dated and upscale businesses are lacking.  
498 Roads, traffic, homeless  
499 Traffic, crime, homelessness, substandard police force, city council/mayor, logistics center overdevelopment.  
500 Crime, homelessness, inefficient police.  
501 Homeless, theft  
502 All the warehousing/logistic centers along with their diesel trucks. They use up too much land which should be used for non-warehouse jobs and their jobs are becoming automated/robotic. The jobs are also unhealthy because the workers breath in lots of diesel pollution and they are low paying.  
The City placing warehousing too close to peoples homes is also a problem. The same diesel pollution causes health problems for us in Moreno Valley. This is especially true for the young and elderly.  
Then there is all the truck traffic. Many trucks would use I-10 to head East if we did not attract them with our warehousing.  
503 Crime, homeless, many abandon buildings and businesses  
504 Not enough recreational areas in different parts of the city. Entertainment is lacking as well.  
Riverside has a good vibe.

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505 The homeless population is growing and I feel my safety is at risk when I go out to places like the gas station.

506 The amount of people begging for money on the street/gas stations.

3. What types of development does Moreno Valley need more of in the future? For each type, tell us if you think it's a high, medium, or low priority over the next 20 years. (203 Responses Total)

1 Development which creates well-paying jobs for educated residents

2 All businesses should have uniform signage throughout the city.

3 Would like to see the city pursue a broad range of business categories to offer job diversity. Too

much focus on jobs for those with limited education (eg: logistics). Some of us aspire for a better

range of opportunities in our city. We should encourage manufacturing or save land for it in the future.

4 Professional industry and manufacturing that will help lift the standard of living and make Moreno

Valley a desirable place to live and work. I want everyone growing up in our city and getting a good

education to be able to live and work in this area without having to commute to LA or Orange

County for a good salary career.

5 Homeless housing, charity kitchens

6 We need to bring businesses and jobs that help to support green initiatives to our community that

help our local residents and environment stay healthy. Warehouses and trucks and "business/industrial parks" are the last thing we need; these only contribute more air and noise

pollution and take away the feel of a community that attracts and retains families looking for a high quality of life.

7 This is such an odd survey. It would be helpful to know where exactly you plan on putting each of

these land uses rather than just asking what is wanted. It depends on the location and adjacent

land uses, densities of land uses planned.

8 I do not think that fields of warehouses everywhere are good for the city or its reputation.

9 A REAL theater not this planned amphitheater! A safe "downtown".....

10 New townhomes, apartments or condos should be build near transit options, bike

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lanes and  
sidewalks. Should continue to develop the medical corridor by Cactus/ Nason were  
the County  
hospital and Kaiser hospital are currently. If warehouses are build in that area, it  
will decrease the  
value of that area for professional and health care use and development.  
11 More open spaces.  
12 Places for our resident's to spend money here.  
13 No more pot shops.  
14 If Gutierrez says we have 95% employment rate then we are good. I think we  
need wilderness  
parks where we can continue to share the open spaces with wildlife and continue to  
enjoy the view,  
vistas, skylines, sunsets, moutain and hills in the distance. I just drove past  
Ironwood Ave and  
Heacock and was appalled to see tilt ups going in that scream loudly that they don't  
fit in to the  
surrounding neighborhood and those fito the north of that project have completely  
lost their view to  
the south and lost 10's of thousand of dollars in property value.  
15 Stop adding manufacturing buildings, we don't want to become Ontario, we  
would rather become a  
nice little town like Norco or Woodcrest with areas that build community like sports  
facilities for  
kids not buildings for a bunch of truckers.  
16 We need medical, high tech, and real industry related jobs, not warehouse jobs.  
17 No more warehouses.  
18 Need more police  
19 Jobs but not warehouse jobs. Business parks but not industrial areas that are just  
more logistics  
centers. And a dog park on the west side of town.  
20 Need more condos  
21 We need a city hub, a walkable downtown with shops, offices, restaurants, city  
apartments, parks.  
22 More soccer fields or football fields in local areas.  
23 More recreational activities for youths.  
24 Safety should be number 1 on everyone's page for the residents of moreno valley  
More police!  
More arrests and convictions  
Stop letting the criminals run everything!!!  
25 Our city doesn't need more warehouses and I'm disappointed that the wording  
was not corrected to  
reflect business park/industrial is another word for warehouses. We need more open

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space especially in the NE area. We need our master planned trails connected up and completed. The mayor claims 95% of residents are employed so jobs are now low priority. The city is unable to provide the services needed to existing residents so adding more homes is irresponsible. People over profits- stop giving away our tax dollars to Benzeevi (gift of public funds) when he produces nothing.

26 Would like to see that the city provides opportunities for job diversity and not just focusing on logistic jobs. How about medical, manufacturing, professional/technical jobs.

27 More sit down coffee shops and restaurants people can walk to like canyon crest.

28 Attractions. Trees. Free events.

29 A Cultural Center depicting history, art, music, dance, festivals.

30 No more low-paid industrial spaces that increase traffic and put dangerous chemicals next to residents. There are a lot of people in Moreno Valley who travel to Los Angeles and Orange County daily for high-tech, high-wage jobs. Attract tech here. Instead of giving handouts to warehouses where low-wage "human robots" with no upward mobility will be replaced by real robots. MoVal needs mixed use spaces with high paying jobs, tech (not warehouses), living and shopping within walking distance, and ideally well-communicated with public transportation to train service.

31 Anything non-warehouse related. No to Fairview Highland.

32 No more mega warehouses

33 We need to be strategic and bring a lot more local jobs

34 Moreno Valley needs more affordable housing. That means small houses with smaller lot. There are too many R5 zoning parcels. They should be re-zoned to RA10, R15 or R30 to allow for more affordable houses.

35 Moreno Valley need more affordable houses, e.g., smaller houses with small lot so the price will be lower. There are too many R5 zones parcels. They should be re-zoned to RA-10 or R15 or R30.

36 No more warehouses and homeless

37 Jobs that pay a lot better than Industrial/Warehousing.

38 An other chick fil A and in nd out burgers

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39 I am a civil engineer and I think that we have a lot of undeveloped land that has potential to make our city one of the best in southern California. For example, we can have a shopping center similar to Victoria Gardens but with outlet stores, which draw a lot of customers when the shopping strip mall is large and has other attractions such as restaurants, movie theaters, parks, concert stages, water ways similar to downtown San Antonio Texas. An attractive location for this is the land enclosed by Lasselle-Cactus-Nason, especially if Lake Perris is selected as a rowing venue for the 2028 Olympic games as this area is close to the Lake. Perhaps a new City Hall could also be built there.

Another option for that land is a university campus, if you could reach out to Universities and colleges that may be interested in having a campus in Moval. By the 60 freeway on the north-east side of Moval we could have a rest area because many commercial trucks and passenger vehicles heading in and out of the desert area and beyond choose to bypass Redlands & San Bernardino by taking the 60 freeway. This area is also a great location for the outlet strip mall as many people from San Jacinto and Hemet use the 60 freeway to travel west to work, school and other destinations.

40 Plan should support development that will create jobs that will support and improve the quality of life of the residents for the next twenty years: manufacturing (e.g. solar photovoltaic, wind turbines, health-related equipment), high technology businesses (e.g. software developers, statisticians), and businesses that emphasize health of Moreno Valley citizens (e.g. health food stores - large and small -, alternative and herbal medicine, etc.). The City should not be overdependent on Warehouse jobs, since those jobs may be lost, are not the future for California, and workers are generally low-skilled with no prospects to move upwardly in society; they should be part of the equation, but not overemphasized.

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41 Affordable housing  
42 Homes on large lots in the North East part of town as was always planed.  
43 We need some higher quality businesses like tech or medical and better grocery stores like Ralphs and Sprouts.  
44 Encouragement of family (mom, dad, children) growth as the center of community and community life.  
45 Remodeling the Moreno Valley Library should have been a priority instead of spending millions of dollars on a soccer field.  
46 NorthEast end Shopping and Media activities, Housing (Single Family and Multi-Unit). Small Community Parks with a larger Cultural Wildlife Sanctuary, Horse Riding, Moreno Valley Historical Museum, Waterpark and Overnite Camping area (Space Reserved and Revenue Producing...) Such as, the County Park on Crestview in Rubidoux area. Go look and inquire... Here's a historical and recreational tool which pay's for itself, staff and. brings in non-residents, who will spend more money on gas, food, etc...  
47 More high tech (the city needs to invest in municipal broadband), and manufacturing, high end professional (need municipal broadband), and medical (need municipal broadband) businesses.  
Also more residential near transportation hubs (we need more rail). No more warehouses. And at least three more libraries.  
48 Outdoor mall. Bottle neck getting out of Moreno Valley on fwy. Always a traffic jam  
49 A nexus with the outstanding biodiversity in the east end. A agricultural preserve for beauty, home values and a connection to the valley's identity.  
50 We don't need more we need less buildings approval so we Preserve our city.  
51 School funding overall from HeadStart to Community College.  
52 Restaurant row and gathering places  
These is empty buildings including the mall  
53 We must stop approving one warehouse after another. We must offer our students and adults healthier and higher paying jobs.  
More high tech job offerings, More medical field job offerings, More manufacturing, More office and

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More jobs that permit unions which usually are higher paying with more benefits. It is important to offer affordable housing. This housing, however, must be near transit centers, bus lines, shopping areas, good sidewalks, and bike lanes. Placing these needed units without the above infrastructure would be cruel.

I believe the State's effort to encourage/support affordable housing also requires them to be near transit centers with the necessary infrastructure to support those needing affordable housing.

54 We need fewer warehouses!

55 Moreno Valley is too expensive for how they keep it up

56 I would like to see more medical related businesses or high tech, real manufacturing and Family type entertainment — not warehousing.

57 Bring the medical industry to Moreno Valley. The upper class of people in the medical field will help diversify our city in a positive way.

58 You speak of jobs, but the only jobs that have been created are warehouse jobs that cannot provide for a family. We need more businesses that can create jobs with wages that allow people to live comfortably rather than by the skin of their teeth.

59 Stop building warehouses!

60 We need to improve the cultural offerings of the city, and in an aesthetically pleasing way (with care for architecture, landscaping, parking, layout, maintenance, e.t.c). We need world class or near world class museums, theaters, music halls, shopping, etc. Start off with one or two projects but do them well. We have no worthwhile downtown. This city was built in a rush and it shows. We need to slow down and do things right - with quality.

61 Rebuild the Moreno valley police force and emergency responses. Be less reliant on the riverside county sheriff's department to patrol and police our own community. Establish a stronger and healthier community by becoming more involved with community care and response.

62 more high tech and professional level business, not warehouses which contribute to overburdening the 60 freeway with polluting truck traffic, do not pack dense housing, condos, apartments, etc. into

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the North East which will further increase pollution and traffic on the 60, traffic on the 2 canyon roads going North out of MV have been overburdened for years, leaving MV in the morning is like trying to break out of a prison, returning in the evening is like trying to storm a fortress, don't add to the traffic and pollution problem, don't ruin what's left of the city with a peaceful rural feel

63 Use march air base for airspace industry hub as well as medical center

64 Large manufacturing, no more distribution

65 The golf course needs to be opened and remain a golf course. It is a huge part of why we purchased our home in Ridgecrest and if the golf course is turned into a high traffic place for more crime to grow then we will be moving OUT of Moreno Valley.

66 Office building with high paying jobs, union jobs, I.T. jobs

67 Put things in the right place! Don't put housing near warehouses ! Keep the city we're things are in the right place near the air base not in residential areas ! Residents need to have a say ! Not just elected officials! There voting on issues they want not the people there suppose to represent!

68 Open space recreation opportunities (like Box Springs Park, Lake Perris) that could be developed from hilly land at edges of and in the middle of the city.

69 Dog parks. Make MV a place where you feel safe. Community events.

70 Have more traffic control on fast drivers.

71 Road and light infrastructure. Roads aren't wide enough. Lights are always on timers instead sensors and I'm sitting at red light while no one else is around. And our speed limits are too low. For example cactus has a speed limit of 50 but Alessandro is at 45, and Heacock is 35. These are major streets when I'm communicating. Also we need another outlet from Moval to everywhere.

72 Biomedical, Biotech, Industrial industries to create jobs in those fields

73 Businesses other than low paying warehouse jobs

74 We need to look for technology high speed internet all over focus less on industrial and more on tech

75 Nature trails and open space parks.

76 Over crowded freeways because of large warehouse trucks, freeways needed expanded before large



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warehouses are built to allow for trucks.  
77 I just mostly want to see the structures and landscape that is already here being kept nice so that when we drive around it is pleasant to look at.  
78 Attract high skilled and professional industries to the city. Which will translate to available high paying jobs.  
79 Medical facilities  
80 Infrastructure!! Our own police and fire departments. They build a sense of community. Look at the cities of Downey and Murrieta as examples.  
81 More security and cleaning/upkeep of the things we already have (streets, sidewalks, schools)  
82 A true center of the city. Park and Surrounded by commercial district  
83 Transportation, train, and buses so everyone can get from here to the beach, airport or San Diego or L.A.  
84 Downtown area  
85 Whole food stores  
86 No more warehouses! They destroy the beauty and when you drive there it causes traffic  
87 More law enforcement presence for better response times. Possibly are own city department.  
88 Roads re-paved not just patch-up  
89 Needs more law enforcement  
90 IT industry, and schooling, more trade schools  
91 Provide homeless people with some homes and give them better life  
92 Re pave all roads and have a fast response rate to damaged roads.  
93 Help for the homeless  
94 Maybe some kind of regional attraction to bring in visitor dollars  
95 Structural modification to highways that will allow more drivers to pass by Moreno Valley.  
96 Most folks leave Moreno Valley to seek better entertainment and food. We need a major attraction that are community can enjoy while also help retain tax dollars in our community.  
97 More police. More trees. Make all of Moreno Valley as beautiful as Sunnymead ranch.  
98 Local small businesses and boutiques would be nice. Maybe a "downtown" night life to generate more income to the city.  
99 If not a YMCA, then something like it. The young people with limited resources need a place to go be children also.

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100 Larger parks and improving the mall.  
101 No more warehouses!  
102 More attention to our roads and freeway! We need better traffic solutions  
103 Reduce the everyday grid lock on the freeways entering and exiting the city.  
This would make the  
city a better choice to reside at.  
104 A garden type of area, that can also serve as a social gathering place.  
105 Focus on growth that provides positive impact on our environment, such as  
only green housing and  
building projects. Increase opportunities for work that focus on real manufacturing  
Not  
warehousing products. City beautification that includes maintained landscaping that  
is Not cement  
but includes trees and natural ground cover. Leave current residential designation in  
the northeast  
as the original plan designed.  
No more warehousing for our city.  
106 We want medical related businesses, high tech, real manufacturing and other  
specific types of  
businesses — not warehousing.  
107 More entertainment for all ages  
108 Youth centers for kids after school.  
Transportation for homeless to get to shelters available.  
clean up what we have. It's a disgrace.  
109 More bridge crossings over the 60 Freeway  
110 Another walking track, also put up signage and walking mileage info at all  
parks. Most other parks  
are rambling pretty, where Lasalle is nice and flat. I use a cane and walker. I need  
flat area to walk  
after work. Senior programs that are after 5pm I think center closes. I work 8-6 so I  
can never go  
there and enjoy any evening programs since they don't have any. I would love to see  
a Chair yoga  
class and chair exercise class after hours  
111 Homeless shelters and support centers! This is a growing concern that I believe  
the city has  
attempted to offer assistance with the Homeless working programs but having a  
shelter and/or  
place that offers support services like showers, laundry and more.  
112 More parks for children to play and to walk our dogs!  
113 Housing development and roads  
114 Mixed use land for churches  
115 Moreno Valley needs to be a center of attraction that people won't say like " oh

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Moreno Valley  
“ instead be like “ oh Moreno Valley ” more attractions for young adults and teens.  
Bars,  
restaurants, variety of entertainment, top notch shopping centers like coach, Calvin Klein, Levi’s,  
dolce and Gabbana, iPhone store. Just like a Victoria gardens in Rancho Cucamonga or Cabazon to the East. I also feel like this town needs a university that can offer better high quality job instead of just warehouse education. I mean warehouses are good for those that don’t mind working in them but I feel like we need other jobs in the city to be attractive to higher-middle class. We also need higher class housing for those who can afford them instead of apartment towns. A Trader Joe’s, spouts, Ralph’s, Albertsons, and more vegan restaurants like Tender Greens please, not just a whole lot of burger joints in every corner. We need variety of healthy food restaurants that can provide a better life style for the residents of tomorrow. Thank you.  
116 Since we do have very poor air quality I suggest that we reach out to educational institutions and commercial ventures seeking to develop air cleansing/carbon removing systems and encourage them through incentives to set up their research and prototype facilities here.  
117 Parks  
118 Parks  
119 I was onboard with the concept that was started a few years ago of making the east end of the city more like a medical center between the two current hospitals. Building supporting medical facilities like Physical Therapy, Pharmacies, Diagnostics such as X-rays, labs, also primary care doctors and specialty doctors, a rehab center, kind of like what Loma Linda has created. Medicine seems to be the future and Moreno Valley has a headstart already. Then housing. All types. To support Doctors and other medical professionals that want to reduce their commute. If we bring the city up to scale it will attract more professionals, which will raise the economy with their spending and encourage retailers to locate here. Maybe that will help pay for the extra law enforcement we seem to need.

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Also, there was a nice trend of making Sunnymead look better several years ago, but we still have lost our intended improved image there, despite making the street more becoming. There's a lot of low rent businesses and I feel the buildings aren't attractive enough to pull in better retailers. I don't mind we have those businesses, but somewhere less prominent. We tried to make Sunnymead Blvd like a "gateway" so what people see when they go down that boulevard is tired, run down businesses that are a poor reflection of our city in prominent location .

120 After school and weekend programs for youth with transportation.  
121 Better freeway system to riverside, more transit options.  
122 Single family houses.  
123 Family entertainment businesses  
124 The city does not have many safe places for young adults to listen to live music or dancing.  
125 More roadways leading in and out of Moreno Valley  
126 Please do not build any more warehouses. The jobs that warehouses generate are relatively low paying and low skill. In addition, more and more big rig trucks are crowding our freeways and polluting our air. I feel that warehouses are ugly and we do not need any more within our city limits.  
127 Maintain the rural feel of the east side of town  
128 Lower cost houses and apartments for all  
129 Better freeways and streets  
130 Keeping the east side quiet.  
131 For the town center, have you ever thought about designing where people could walk freely and not having worry about cars? Also for the buildings to be energy efficient because climate change.  
132 Completion of the World Logistics Center, building and occupancy of the facility.  
133 Redo the mall. Malls are antiquated. Tear down the walls and open it up like Cabazon or DT Disney, City Walk or other newer open shopping centers with fountains and etc. Market investors for fun centers, race cars, music, arts, pilates studios, poetry, draw the college kids from UCR and RCC...more trendy things.  
134 Improve the look. Day street needs improvement. High volume traffic but the

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look is bad. Needs  
newer plants. It's the first impression of Moreno Valley.  
135 Utilizing and converting current empty areas to prevent homeless and squatting  
136 Restaurants, Restaurants, Restaurants.  
137 I believe there should be affordable housing, but I think it needs to be thought  
out where it should  
go. There is no entertainment on the east end of town and I don't want to live with  
more mini  
malls. It would be great to have something like Victoria Garden. An outdoor  
shopping area with  
restaurants.  
138 A real "downtown" area that mixes both business and shopping.  
139 Consider rail line extensions to reduce truck traffic related to logistics  
warehouses  
140 Safe places for teenagers to get together, especially in the summer. Teenage  
classes to help prepare  
them for life, like financial, relationships, responsibilities, etc. Teenage work &  
intern programs  
with more diversity through local companies.  
Also, programs for all kids to interact with seniors, like playing games or art  
projects.  
141 A "core" cultural, shopping, entertainment area unique to Moreno Valley, along  
the lines of  
downtown Riverside or Old Town Temecula  
142 East side your town need major road work as well more law enforcement  
patrols.  
143 Better road conditions (width, surface, markings)  
144 We need all of this, but I am afraid we be like any other city with too much of  
everything including  
people, building, cars etc.  
145 High end jobs  
146 Development that creates quality jobs. Not just minimum wage warehouse and  
restaurant jobs.  
147 Medical related businesses, high tech businesses. Also real manufacturing  
where a product is made.  
NOT WAREHOUSING.  
148 Medical related businesses, high tech business.  
149 medical related businesses, high tech, real manufacturing and high end sit down  
restaurants— not  
warehousing, apartments or condos. Keep North East Moreno Valley minimum one  
half acre home  
lots. We do not want strip malls that bring crime and the homeless. We  
acknowledge the state

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housing shortage however they should place this housing near transit centers/public transit, sidewalks, bike lanes, and close to shopping.

150 More family oriented activities

151 Golf, boating parks for fun

152 Large homes

153 medical related businesses, high tech, real manufacturing and other specific types of businesses, NOT warehousing

154 Entertainment, bars. Keep the younger folks in the city, shorter rides home after a night out.

155 I do not want any more warehousing in this City.. we need public facilities such as a large city park

156 Years earlier a Medical Training Facility, to be the largest in Southern California was planned for March ARB. That is no longer mentioned. It would be good for our community.

157 Bring in businesses that will attract middle and upper middle class people, such as medical. Quit allowing street vendors. Do not build low income housing and apartments.

158 large equestrian homes

159 No low income apartments. Look what it did to San Bernardino. Study other cities like Riverside to see how they turned that city around.

160 The current General Plan obviously did prevent an increase in air pollution and traffic and it did not foster development of career-oriented jobs for working families. It also did not assist with improving the school system. The next General Plan must incorporate every means needed to reduce air pollution and enhance livability of our city. More warehouses is NOT the answer. They only add more large-truck traffic and air pollution. The next General Plan must consider the warming of our Planet and integrate means to reduce greenhouse gas, not add to it. The reduction of air pollution must be intentional – not because of minor changes made to accommodate State laws. Our City should become a leader in future green jobs-not fall back on the only industry we apparently know-warehousing.

161 We need city leaders to keep their promises

162 I am afraid that your first question refers to warehouses. I do not want any more warehouses.

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They do not bring in good paying jobs yet overrun our streets with polluting trucks.  
163 Moreno Valley can't fill the retail space and keep the homes filled that they already have.  
164 Why do we spend millions on a soccer park only to have out of towners tear it up and then taxpayers are expected to refurbish it regularly. This community was grown on aviation. Why don't we have a real dedicated model aircraft field?  
165 street and bridge enlargement where heavy vehicle traffic is expected such as Edo's east side world logistic center.  
166 Expand the bridges of Moreno Beach and Redlands.  
167 Large lot single family homes. Large wooded area parks and horse trails as stated when i bought in the area over 34 years ago.  
168 We need an OLD TOWN Street created with shops and restaurants with only side walk entrances in the front and parking would be out of view. That atmosphere is why most my friends eat somewhere else like Riverside or beach cities. It is so relaxing to walk the streets after meals.  
169 High paying jobs in the medical, manufacturing, retail, engineering fields.  
170 A park to walk, hike and run located close Nason and Ironwood.  
171 Tech jobs, small businesses, alternative health facilities, nature centers and parks  
172 Senior living places to go with medical and healthcare expansion  
173 Increased medical facilities and emphasis on development of the area around the hospital that would make it attractive for medical personnel to actually live here rather than going south to Menifee etc.  
174 Moreno Valley needs medical related businesses, high tech, real manufacturing and other businesses we do not need anymore warehouses.  
175 Office, medical and high paying jobs  
176 Higher educational opportunities, health care centers, diversity in jobs and industry.  
177 Jobs in the fields of medical and manufacturing.  
178 I believe that all of the above are extremely important for all cities to strive for. If we focus on creating the housing within walking distance to the above listed facilities we promote lower pollution through lower commutes, a healthier population with less travel time and

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stress, and a more tight knit community. Additionally if we create pathways for low speed electric options (Segways, scooters, street legal golf carts,...) we increase the above benefits for our community and its people.

179 Preserve the open lands in the northeastern part of the City. This is why people move here.

180 good trail system for walkers bikers and horse riders. also housing for low income and the homeless

181 A development that would attract people from surrounding communities to the city and generate sales, such as, events venue, better shopping center or outlet, etc.

182 Warehouses

183 We do not need 40 million square feet of warehousing in the East End! Getting that project approved was an example of the very worst buying of influence and power that exists just about anywhere!! And the following effort to circumvent state law was disgusting and, as it turns out, a complete failure! I honestly do not see how Baca, Gutierrez, Cabrera, and maybe Thornton, can look themselves in the mirror and not see the words "SELL OUT" in bright red plastered on their faces!!

184 Regarding 'Town Centers'- Priority for redevelopment of run down under utilized plazas; Not new.

Regarding 'Recreation Facilities'- Priority for Biking and Walking trails/pathways/lanes, and green spaces.

Regarding 'Housing'- Special focus to be given to new and expanding Senior Housing and Facilities.

185 Sustainability / Green Energy / Recycling / Public Trans (streetcars and trains)

186 Professional / executive jobs

187 We need high quality restaurants, shopping, and entertainment. We shouldn't have to drive to Rancho Cucamonga or Temecula for those things. Its half an hour to reach a Trader Joes and the drive to Sprouts in Riverside can be nearly as long when traffic is bad.

188 Medical office facilities, services and activities for residents especially seniors.

189 Needs major public swimming pool," and diving pool. Like the aquatic centers at Irvine, CA. Use this as an example



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190 People centered employment  
191 Keep Moreno Valley clean. Also focus on small theft and protecting the rights of homeowners. Focus on homelessness and crime top priority.  
192 Better food spots more diverse mix of food spots such as vegan/vegetarian  
193 A real library!  
194 Seriously, a performing arts center and a larger library! Also a museum, any type or at least gallery space. Reuse the mall to include more sit down restaurants, entertainment and housing within walking distance. The Town Center idea at Nason is great as well. Enough with the Industrial.  
195 More teen activities  
196 Less warehouses please. How many are going to be empty soon? Also the noise, pollution from all the diesel trucks does not help the already substandard air quality.  
197 Walkable Downtown area  
198 Cleaning up the criminals, public safety, residents need to feel safe, whether at home or in public.  
199 Library/internet branches, activities for children and teens.  
200 Child and senior care combined facilities.  
City library branches/internet labs.  
201 We need more open space. We need more passive parks where families can just enjoy a picnic/BBQ. The more high density homes we build, the more we need parks where families can relax and enjoy themselves under trees. Perhaps just throw a Frisbee and not all the other team sports.  
202 Business and industrial parks are ruining the charm of places like Moreno Valley. Most of those places (warehouses) have very few cars, many are automated and the facilities bring in their own staff. They're an eye sore.  
203 Mixed use

4. Thinking about getting around town, please tell us if you think these things are a high, medium, or low priority for Moreno Valley over the next 20 years. (122 Responses Total)

1 Need a city wide transit system. Need concentrated areas of housing, commerce, and transit.  
Encourage or require charging stations to be installed. This would apply to any

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other technologies  
that come along.

2 Bike paths are ok, but the new version (example Frederick by Chili's) are  
confusing for everyone  
and are more dangerous than helpful

3 Day St has to be the most congested place in Moreno Valley, everywhere else is  
pretty chill

4 We need a bold vision that meets today's needs as well as anticipating the needs  
of the future.

Electric charging stations, effective and safe public transportation, and less fossil  
fuel

transportation are all needed to help alleviate congestion. Also, encouraging and  
incentivizing

families to utilize school buses for their child's transportation to school vs. every  
parent driving a

child to school will aid in traffic reduction.

5 Less traffic and big rigs will make less traffic

6 Safety of or community, I recommend looking into branching out to have our own  
police

department. That could help us as a City.

7 The big rig trucks are ruining the roads. Less truck traffic. We need more police.

8 The best way to reduce the traffic is to reduce the number of bigs coming in and  
out of MV at all

times of the night and day. By doing this the freeways will be back to a normal  
volume and the

pollution will be reduced too.

9 There are several long streets in Mo Val that need to have better speed controls  
for public safety

like Locust Ave which is supposed to be 40 MPH and is often 60+ MPH. Just put in  
a couple stop

signs to slow traffic down, not hard or expensive.

10 Fix the 60! Widen it!! I see Amazon nextdoor. Traffic is already killing us  
commuters.

11 Complete trail systems in north part of town and other areas for walkers and  
runners.

12 We need an alternative to the 60 that people will get off the freeway and use to  
travel through the

city. A train line from old Moreno to tie into the current Perris to Riverside run  
would bring people,

business and money to the city

13 More cameras

14 Beautifying the streets with plants and trees.

15 Beautifying the streets with lights and plants.

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16 Complete our master planned trails for those who walk, hike, ride horses.  
17 Improve what's already available with safe roads  
18 More parks and lots of trees. When I travel to other cities, what makes neighborhoods appealing is a tree-lined street. We also need to help people maintain their homes through city grants.  
19 Challenge of zoning. Metrolink services MoValley, but can anyone live near trains at a walkable distance? This is a distinct failure of Southern California development. You shouldn't have to drive to take a train. You should be able to walk to grocery, dry cleaner, transportation. Take a trip to DC, NY, Philly, parts of Denver and study how other cities are successfully addressing the issue. Surveys are great, but answers are out there... unfortunately, many key decisions have already passed and high-priced construction has already occurred  
20 Keep the rural nature of MV, eliminate the expansion of truck travel  
21 Creating Town Centers with walkability seems to be the way to go, including residential around or even in the mall.  
22 Increase penalties or confiscate commercial vehicles parked or operating in residential areas.  
23 improving certain on/off ramps like perris blvd on 60 freeway to reduce traffic congestion  
24 Development of open land for parks and family recreation, where people can gather, picnic, fly kites, play catch.  
25 Traffic control coordination of lights... Improvements to certain I-60 overpasses (i.e. Indian, Nason, Moreno Beach, Redlands Blvd. and Theodore (WLC), as well as, Gilman Springs... Widen to double lanes to three each way overpasses to handle increased traffic from both, Commercial and Residential use... Remember, plan and spend now means tomorrow's unnecessary improvements later, expect costs to double...  
26 More public trans, with high density housing near transportation/retail hubs.  
27 Get rid of the "Logistic Mentality". Drain the swamp of developer influence on City Council. This stains our reputation through-out southern California.  
28 More signs for our city speed limits.  
29 Most people who are involved in transportation know we cannot build ourselves out of congestion.

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Widening roads and/or building new roads will only result in more induced traffic. Alternative forms of transportation with the lowest fares possible is what is needed. There is a growing number of cities that offer public transportation at no cost. They have learned that building and maintaining roads is very, very expensive and significantly adds to the problem of Climate Change.

30 Get the trucks off Moreno Valley roads!

31 I would like to see more emphasis on Family outing entertainment, i.e. Parks, with game areas for all ages, from toddler to teens and paths for walking for elderly.

32 Making traffic lanes narrower to install bike lanes that nobody uses is a safety hazard in my opinion.

33 Freeway overpass at Moreno Beach needs improving. Canyon traffic (both canyons) is bad.

34 Most of these things are jokes! Roadway safety and reduced collisions can't be fixed by more laws, it has to do with the lack of quality of the drivers in the city. Reducing traffic and congestion can't be done by adding more dense housing, condos, apartments and warehouses! The same goes for making it safer to ride a bike, or walk the streets. Public transportation in CA (other than busses) does not work. It costs too much and can't cover enough area due to the large footprint of CA cities.

35 Electric vehicle charging stations

36 The city needs to take control of all the rentals in residential neighborhoods! It's a bordello in this city ! It's difficult to maintain a house with the trash around !

37 News to continue to use All American Asphalt for street repairs. You definitely can tell the difference and quality when use another company

38 Many people run red lights. Need more police presence.

39 Parks with walking trails

40 Expanding the freeway to add more lanes & minimize traffic

41 These semi trucks are ruining our roads

42 Restrict truck traffic on surrounding freeways to right lane only with very stiff penalties if they venture into left lanes. They are the cause for nightmare traffic surrounding a town that is not big

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enough to warrant that type of traffic.

43 Proper police department

44 Clean up crews needed on regular basis to keep road sides free of weeds and litter.

45 Our city used to keep the roads in our neighborhoods up as well, and they haven't been done for years now.

46 Police patrolling city streets.

47 Crossing guards where there is high traffic around schools

48 Light rail system would transform the city

49 Discounts

50 a monorail to avoid the traffic.

51 Fix the damn roads

52 Walk-way tracks for leisure walks /jogging /cycling throughout the city

53 Time the lights better so traffic can move longer and we can get across town in under 30 minutes

54 A seperate motorway for trucks to pass other than highway.

55 Our roads are constantly being destroyed by high traffic from big rigs. There should be designated routes and lanes for those types of vehicles in order to help preserve the roads for other vehicles.

Also, an agreements with local large consumer distribution warehouses should be made to help

protect our roads by the use of their heavy vehicles

56 assessing streets for current traffic patterns, installing speed bumps around schools and

neighborhoods, people when trying to "cut time" speed thru residential neighborhoods specially in

the morning when kids on they way to school and everybody is late

57 Speed humps in on residential streets that connect major streets. Keep the speeders out of

residential areas and on major street so it becomes easier to ticket them.

58 Bring shopping area signs and parking lots up to date. Bring higher end restaurants here. Create a

Restaurant Row area. Copy Victoria Garden or Dos Lago shopping areas.

59 Need coverings over bus stops for when the sun is hot. It's very hard to sit and stand at bus stops in

Moreno Valley that have absolutely no covering

60 New developments should plan for more parking areas. There are far too many cars parked on the

streets that interfere with trash collection and mail delivery.

61 Stop building apartments in areas already overly congested with traffic. Work with the school

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district to decrease parental traffic around schools. Our traffic problems decrease greatly on surface streets and the 60 freeway when school is off session. That indicates our students need a better system for getting to and from school which would help our morning and afternoon traffic congestion . Think beyond more and bigger roads .

62 When we call into the city, I don't like having to talk to some guy who says there are only 3 people working this whole city, trimming trees, and filling pot holes, and he is one of them. I didn't call to hear someone whine about 3 guys doing everything? What kind of management is this?

63 Bike trails away from road traffic and freeways.

64 truck rules of the roads and corridor for them so as not to disrupt the commuters!!! Mail Delivery limited to 5 days a week

65 Roads are full of potholes....not maintained. Traffic lights need to be synchronized to keep traffic flowing.

66 Adding new roads and expanding existing roads

67 If there are no attractions to visit, then there is less need for city transportation...keeping roads well maintained

68 Not only never ending fixing potholes; but expanding the freeways and main thoroughfares in anticipation of the logistics center and other warehouses.

69 Stop supporting a massive warehouse project that is projected to generate an additional 68,721 vehicle trips a day, 14,006 of which would be trucks.

70 Filling potholes, repaving.

71 Fix potholes

72 fix traffic before continuing to grow the city

73 More street lights because there are some streets that are really dark.

74 Finish the Pigeon Pass Corridor.

75 Freeway overpasses such as Moreno beach are in adequate. Traffic circulation around some business districts is in adequate.

76 Stop building more homes and apartments. Restore many existing homes and apartments.

77 Regarding traffic and roadway safety... there are too many large trucks on our freeways (60 and 215). Many of these trucks cause traffic backups due to them driving in the middle

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lane. Also, I  
have seen many pedestrians crossing in the middle of the street with little or no  
regard to their own  
safety or the safety of drivers. It would be nice if something could be done about  
this because I  
encounter pedestrians illegally crossing almost weekly.  
78 More Senior houses and apartments  
79 Fix the 60 and 215  
80 YES. Public transportation  
81 What about a Civic Center, Sunnymead, Frederick, Day Street and Alessandro  
Trolley?  
82 Make freeway bigger. Improve day street roads. High market location. It should  
be priority to make  
that look good. All major stores are there and the looks is low.  
83 I would like all streets in our current area to be no parking to prevent cars from  
stopping and doing  
illegal activities. Especially when it is the side of someone's house. For example  
corner of twilight  
way and locust. Huge problem with people there.  
84 Extend rail lines to reduce heavy truck traffic from logistics warehouses  
85 Electric vehicle charging stations in rental properties for all renters to use (Why  
should electric  
vehicles be only available for use with homeowners?)  
86 Work on the homeless problem and start cracking down on crime in the area.  
Hire more police  
officers. Worry less about building more buildings and making the traffic worse  
than it already is.  
87 Bicycles do not pay road taxes so we do not provide bike lanes for recreational  
bike riders. Our  
roads are the worse in the county. We need more traffic police for drivers who do  
not respect the  
double yellow line.  
88 Get rid of the addicts and section 8s  
89 The roads in Moreno Valley are falling apart. They need to be correctly  
maintained before they get  
to that point.  
90 The City must have designated truck routes. Adding large trucks to 2-lane roads  
is accident  
inducing. Arterial lanes for express light rail or electric buses are needed to reduce  
single  
occupancy vehicles. Accommodating wildlife (burros and coyote) in our traffic  
plans is a must.  
91 We need developers to pay for improvements before they're allowed to build

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their developments

92 I use to ride my bike around town - no more. It's too dangerous.

93 Bike lanes are bullshit, MV is not a cyclist haven we drive. You wouldn't have painted all the bike lanes if it wasn't for state tax monies. Let's face it you have never seen more than two cyclists pass

city hall in an hour. If you were really serious about this town you would address the problems and opportunities that this town needs.

94 Fix pot holes and replace Cottonwood between Redlands and Moreno Beach Drive....

main 2 way street to access the newer community developments and also a main pathway for test

driving all Moss Bros. Dealers

Which beat up the roads daily

95 several streets have no curbs or side walks. some streets go from two lanes to one lane halfway

through the block causing unnecessary merging of traffic. eliminate these bottle neck spot. example

is Alessandro Blvd east of Perris Blvd.

96 Locating services throughout the city so that it's easy to get to the services available to the citizens.

Example: locate a branch library in each of the 4 coordinates of the city.

97 Find a solution to the homeless population that reflect so poorly on the City. Exit Day St, Frederick,

Heacock or Perris and I dare you to not find homeless....holding signs, pushing shopping carts,

sitting on busstops, camping under bridges and any other place they can find.

98 No more warehousing jobs, it only bring sin uneducated and not prepared people, which brings in more crime and safety concerns.

99 Get rid of all the trash on the side of the freeway, it's junky looking. You'd never see that in Irvine,

Ca

100 Have the horse trails that we're supposed to be installed by Sketchers as in the land development agreement.

101 widening the SR 60

102 A sidewalk is desperately needed on Ironwood between Vista De Cerros and Nason.

103 Reducing congestion. Replacing existing overpasses

104 Please fix the roads!

105 Improve trash collection and grounds maintenance around freeway accesses.



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When people access our city from the freeways, the 1st think they see is overgrown brush and trash. That pretty much sets the tone of most people's view of our city. It would go a long way to improve our city's citizens self image of their community as well.

106 I believe that planning for the new technologies in transportation for a more localized 'live/work' community should drive Moreno Valley's plan for the future. Our 'go forward' plan should work to place us at the forefront of this future rather than in a 'catching up' phase.

107 No more warehouses will help improve a lot of the problems listed above. We are NOT Los Angeles.

108 The places where the SB 1 money has been used to refinish streets are great. I hope the city continues in that direction. But providing public access for trucks to the pipe-dream WLC should not be a priority for the city!! Improve Cactus, but leave it a two-lane/each direction east-west thoroughfare.

109 Safe truck parking area with restroom facility.

110 commuter traffic in and out of the city

111 Traffic signal synchronization technology.

Increasing focus on improvements to the 215 and 60 freeways.

Traffic Enforcement.

112 School transportation. I'm having to start work later to accommodate and drop off my children at school.

113 Limiting the side roads big rig trucks can drive and park on. Or enforcing laws and ordinances already in place.

114 Homeless is a huge problem

115 We need a downtown area!

116 It's going to take years for any decent public transit and funding, so yes - we still need parking spaces. The car isn't going away any time soon.

117 Increasing walkable areas

118 Maintaining on and offramps

119 City repair of degraded roads, temporary pothole repair lackluster.

120 School zone safety, police regularly watching and ticketing illegal parkers and drivers.

121 We cannot build ourselves out of congestion. Building more lanes will only result in more traffic to

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fill those lanes. We must provide much more public transit with much more consistent service.

Complete bike lanes throughout our City is important as are Multi-use trails.  
122 Electric vehicle parking lots.

5. Thinking about growing the local economy, please tell us if you think these things are a high, medium, or low priority for Moreno Valley over the next 20 years. (105 Responses Total)

1 Need high quality jobs so our kids come back to their hometown after they finish college. This

means white-collar / professional jobs. Find a noteworthy industry or technology hitch (building alternative energy systems - solar panels, wind turbines...) we could be know for.

2 Well paying jobs to reduce the number of our residents that must commute long hours to earn a

good living as those opportunities are very limited here.

3 We need more jobs here, but they need to be with wages where people can live comfortably, not

menial warehouse jobs. People who move here need to already have a job, not to move here and

then expect the city to provide them a job.

4 For the last question, City already does a lot of marketing.

5 Attracting professional type jobs, manufacturing, technology, and other entertainment/hospitality

type jobs (similar to Victoria Gardens) would help make the city a destination.

Don't bring more

warehouse development with low skill/low paying jobs. We have too much already!

6 The city needs to focus on an economy based on more than one industry, i.e. warehouses. It needs

to invest in technology; it needs to work with local universities to develop some type of strategy to

bring in a variety of jobs to the city and better paying jobs. As far as I can tell the city only listens to

developers and special interests. It needs to take special interests out of all the city advisory

committees, planning commission, and other commissions, etc. We need balanced views within the

city government, we need a city council who listens to all of its residents.

7 I know its far-fetched, but tear down the Moreno Valley Mall and build something there that is

useful or a destination. Such as Riverside Raceway was in the past.

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8 More jobs is a joke! Our city ok's warehouse that promise great numbers of jobs that will come with them but that is lie. They are all mostly automated

9 Considering that our locals have something to say about the city they live in.

10 This is a bedroom community. The warehouses are ruining it. The warehouses are not bring in enough jobs to justify them.

11 invite and invest in making Mo Val more of a destination for sports activities for families and having resources that build community and then house values will go up, taxes received will go up to the city, etc. Manufacturing doesn't bring in that many jobs/sq ft and it can destroy the long term home values which is where the property tax revenue comes from and that is a significant revenue stream for the city.

12 We don't need warehouses that provide little, we need office buildings that bring thousands of jobs, meaning people with money to spend locally.

13 We need more shopping outlets.

14 We need more shopping outlets.

15 According to the mayor, 95% of residents are employed therefore "jobs" is not the issue. The issue is that they have doomed the city to low paying jobs by the proliferation of warehouses. Almost all of the "advertising" that the city does is filled with lies and half truths and used as self serving promoting, not promoting the good that so many do here. Return truth and integrity to advertising campaigns. They violate so many rules/laws/municipal codes to promote themselves it's disgusting. Stop giving away our tax dollars to Benzeevi. It should not be the city's job to provide education- schools and universities are already in place for that. The crime and homeless issues need to be solved first before we can hope to bring better businesses- too many are closing.

16 Marijuana friendly city.

17 We need a city council with vision. Hire people from within who have a vested interest in our city.

18 Make MV a gateway to recreation; mountain skiing, hiking, close to Palm Springs, lake Perry's, reopen MV golf course, close to Temecula and San Diego

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19 Attract better retail and grocers  
20 Again town centers. Liked the idea of the Nason/Alessandro workshops and mixed use.  
21 No more warehouses  
22 Corporate office buildings, a university campus, outlet strip mall with restaurants and water ways,  
electric public transportation, rest stop by the freeway, build larger post office on the east side of  
Moreno Valley by Redlands & Alessandro, more shopping centers and banks on the east side.  
23 Make an effort to understand that we bought here because we don't want to be in the place you are trying to turn it into.  
24 Improve medical options.  
25 Curb and Gutter improvements in Edgemont Area, North and Northeast Corridors with Residential, East/Redlands-Old Moreno Area, to include Street light improvements... Storm drain improvement on East Side, where over five (5) years ago Federal monies/grants had been allocated, State and Local as well... However, the County and Locals argued to no end for over a year, despite on-the-ground surveying and pre-identification mapping of site for storm boxes, etc... the entire project was shelved and grants lost due to mismanagement, lack of cooperation between parties on a common plan... ALL MONIES AND PROJECT SHELVED... Great job!!  
26 Advertising is unnecessary if you provide municipal broadband - word will get out, high tech businesses and jobs will come. Spend your advertising budget on building and equipping libraries.  
27 Do not lock in the economy to Logisitics"  
28 I like our city just the way it is, we don't need to expand or extend our commute or destroying beautiful landscapes in order to grow.  
29 Less reliance on warehousing create environments conducive to sell paying jobs I.e. Raise the socioeconomic standard  
30 Creating more jobs in Moreno Valley would be good as long as our City Council would no longer approve any more warehousing/logistic centers. Attracting new business types should be the goal with a long term moratorium on warehousing.  
The best advertising the City can do is to show they have stopped approving more

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warehousing.  
Right now our image is so damaged as the city of warehouses that any PR campaign isn't worth it.  
31 If you are looking at creating more jobs, then you need to look at higher paying industries and those that offer sufficient benefits. I don't have the answer, but if we continue on this cycle of warehouse jobs, the quality of life here will continue to decline.  
32 I don't need any more warehouses  
33 If Moreno valley is not a nice place to live, then I don't see how it would be a good place to work either. Take care of the people that live here already and the rest will follow in turn. The schools here are terrible. Fix them, and that will be a good step towards the future.  
34 More fast food and warehouse jobs are not what is needed. High tech and professional jobs are. Trying to make MV a destination for recreation, shopping, and leisure is a joke! Who would want to come here for that? I suppose the advertising campaigns and training for local residents would be paid for by new taxes. No Way!  
35 Schools need to stop pushing College and free school! Start implementing trade schools ! Not everyone is cut out for college! They need a program in high school ! And pre school for the community!  
36 Better public safety and enforcement so new business don't get broken into and robbed the minute they open. Small businesses need protection from crime, and all need protection from shoplifters, who are apparently robbing merchants blind all over the city.  
37 There's nothing happening on weekends around here. No street fairs, rodeos, casinos, musical theatres or dinner entertainment. No dialing piano bars, no country western dance halls. Teenagers need job training and opportunities to get them off the streets.  
38 Less vacant buildings. More grocery stores.  
39 Improving the schools scholastic scores. I bought a house out here in Moreno Valley 3 years ago. However we did not transfer our kids to Moreno Valley schools due to poor school scores and numerous complaints about teachers, and student bullying.  
40 Making Moreno Valley a tourist destination year round is needed

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41 Pedestrian friendly venues  
42 Stop bringing warehouse jobs to our community. This type of jobs do not afford a livable wage.  
43 Plant trees, maintain green spaces, make MoVal beautiful again. No more empty cement industrial buildings.  
44 Changing the concept that Moreno Valley is a crime filled place. When I tell people where I live, they do not have a positive reaction. We need more positive news stories instead of shootings and kids killing each other at school.  
45 Education activities. Cooking classes. Robotics. Painting. Social dance events. More community events  
46 Please please no billboards like they have on the 91 off Van Buren. Very tacky. Also advertising signs news no longer 90 days hanging on a business. Owners leave it on there for months. It's ugly.  
47 vocational schools specifically for training in different fields that have high paying jobs and not just for the youth but also for older people who lost there jobs after working their jobs for a long period of time.  
48 Stop building houses  
49 There is a balance between improving and raising taxes. I feel this I best solved by a ruthless budget. Too much pork keeps businesses and solid residents from wanting to invest/stay in the area  
50 Warehouse jobs are not adequate income in this area, need more technical and medical jobs  
51 Our community needs higher paying jobs period. Their should be incentives for technology companies to settle in this area.  
52 Vocational Education Program for the trades and good paying manufacturing jobs.  
53 Higher end jobs, more expensive homes, bring wealth to the city, make Moreno Valley beautiful.  
54 No more warehouses or logistic centers. Bring Riverside County program offices here. Council members need to drive around their districts more to keep it looking beautiful.  
55 We need less big and tilt up places. This causes too much congestion with big

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rigs and traffic

56 There needs to be more places for professional sports and theater closer than Los Angeles.

57 Only jobs that provide union representation. More real manufacturing and technology.

No warehousing jobs!!

58 Our parks systems free of drugs and homeless.

They are unusable.

59 White collar job growth, doesn't matter if people earn degrees if there are no jobs where they live!!

Free classes on various health topics and maybe they RCUHS can host some. Need a trash

program!!! Require all drive thrus to have a trash can car accessible from their Drive Thru. School

programs regarding Not littering like we had we I was wrong. To o many peope leave trash every

where.

60 Medical and high tech good paying jobs. No more warehouses.

61 Build roads for new business

62 All of this is important for Moreno to become an anchor city of riverside county and neighboring counties.

63 Attract/create jobs that provide workers with safe and humane working conditions and that pay a livable wage.

64 NO MORE WAREHOUSES! ENOUGH IS ENOUGH.

65 Low: Less warehouse type jobs that have low paying jobs and clog the streets and freeways with semi trucks.

High: More high end jobs that requires skills and education for example; medical, technology, education, etc.

66

67 No more warehouses!

68 No more warehouses!! It's a fallacy that they create jobs. Most are moving towards automation so they won't need humans. And they create too many tractor-trailers that create traffic congestion and air pollution.

69 Change the perception that this is a gang city with high crime.

70 It would be nice if Moreno Valley could have some sort of cultural center where concerts and plays could be performed. We don't seem to have anything "cultural" here. In addition, it

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would be nice if  
our city could become a "foodie" destination. If my family and I want to go to nice  
a "non-chain"  
restaurant, we have to go to a different city to find one. I'm not saying that we don't  
have any fine  
"non-chain" restaurants here, but it would be nice to have more -- and spread out  
through the city --  
not just by Towngate.  
71 Use existing vacant buildings for new businesses.  
72 GOOD paying jobs. No starvation wage.  
73 Innovation and jumping in on trends... seeking out technology more youthfulness  
74 We need something big to attract people to our city. Like a stadium for concerts  
etc  
75 Maintain and enhance the rural lifestyle with horse trails, hiking trails, bike  
trails. Balance jobs  
with housing that is affordable for those jobs. e.g. A new \$32,000 wage job should  
be matched with  
new housing costing no more that \$96,000 within walking or bike riding distance.  
76 Free education for homeless and funding to encourage employers to hire  
homeless and offer rehab.  
77 Attracting new business types needs to be more than just logistics/warehouses  
78 Advertising is futile unless the City can deliver and execute on bring in  
attractions  
79 We do not want warehouses. Warehouses bring in trucks that will clog our  
freeways and surface  
streets, not to mention what the diesel fumes with do to the lungs of Moreno Valley  
residents. The  
215/60 freeway is clogged with trucks now. Take a good look at the freeways  
surrounding Ontario  
and Moreno Valley. The congestion is terrible and all the kids have asthma.  
80 Places that seniors can afford to retire here at.  
81 Jobs should not be created by warehousing... we have approved too much of that  
now.  
82 Moreno Valley has a bad reputation which needs changing. I see rundown  
shopping centers,  
incomplete construction, abandon buildings. Sunnymead blvd. is suppose to be the  
main street but  
what I see is a trashy getto.  
83 Job creation in a general plan must be from cradle to grave and integrate every  
stage in between as  
our workforce ages. NO ONE wants to work in a warehouse, especially as we age.  
A means to  
attract service sector jobs in financial, medical, and technology are important to be



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intentionally  
designed into the General Plans. These types of jobs offer high wages for entry and  
degreed level  
workers. Designated land for this industry should be intentional planned.  
84 Come on. Who wouldn't want more jobs? But warehousing? No thanks.  
85 I'm all for creating more jobs if they are medically related or real manufacturing  
or high tech.  
86 Don't draw LA low life out here, Perris did it and see how it affected them. Why  
import crooks and  
gangs, work on a safe and wholesome community and the right people will come.  
87 Jobs for college students.  
88 Improving our already existing shopping areas. There are too many run down it  
empty storefronts.  
The MV mall needs a total makeover.  
89 Adopt the green new deal, increase the amount of home solar power generation.  
Aggressive 5G  
implementation  
90 Promoting businesses that provide more low paying jobs that do not add to the  
tax base or allow  
spending in MV is the very worst way ti to promote this town. It was once a good  
place to live; not  
so much anymore  
91 No more WAREHOUSE.  
NO MORE 18 WHEELER GOING THRU MY NEIGHBOR HOOD  
92 Diversify jobs and city industry.  
93 We need to create well paying jobs not warehousing jobs. Less of the massive  
concrete tilt up  
buildings  
94 The survey mentions growing tech jobs, but asks nothing about the importance  
of growing the  
medical field in the city! As the seat of the publicly funded county hospital  
(RUMC), Moreno Valley  
has a unique opportunity to take advantages of growing a great medical facility that  
includes high  
tech jobs. Why in the world focus on warehousing, (which will employ fewer and  
fewer people as  
time goes on) instead of building and anticipating the growth in the medical sector  
of the economy?  
95 We have enough logistics industry facilities. Priority and focus now needs to  
shift to other business  
types.  
Advertising only within a very modest budget.  
96 High paying jobs with benefits, now low wage, temporary/ part time jobs.

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97 Creating jobs that will provide residents with a decent living wage not warehouse jobs that require residents to work several jobs to make a living.

98 Moreno Valley mall is dying due to anchor department stores are leaving or had left. Incentive with developers to buy, remodel and expansion to a better "mall"

99 Homeless people need housing. They take over business and become aggressive

100 While it is not the City itself, the school districts need to improve the output/quality of students. No technology jobs are going to come out here with no available workers qualified to work there. Plus, the one huge land owner is only pushing Industrial.

101 Improve natural areas

102 Providing quality technical training programs-plumbing, electrical, HVAC, carpentry, auto repair, computer tech and data security

103 I put "low" for more jobs, because for the majority of our City Council and Planning Commission that means more warehouses. We do not need any more warehouses using up all our job producing lands. We need more health field jobs and tech jobs and office jobs and jobs that requires a little more than High School so we can keep our children from moving away to find those jobs. They usually pay more and are healthier for the employee.

104 Providing skilled trades training at MV college (plumbing, electrical, HVAC, auto repair)

105 There are already a plethora of new businesses here. I see increased homeless people wandering the streets and non licensed vendors on Perris Blvd taking away from legitimate businesses. Businesses I frequent have had t hire security because of the homeless problem. Residents are the ones that pay through increased prices. Why add more, help the businesses that are already here.

6. Thinking about community health and sense of pride, please tell us if you think these things are a high, medium, or low priority for Moreno Valley over the next 20 years. (77 Responses Total)

1 Put forth more sport options such as tennis, racquetball, pool with diving, even horseshoes. Add bike lane on multi-purpose trails (safer riding off the street). We also need more

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creative options  
that provide residence involvement for signing, acting, musical performances, arts  
& crafts and  
opportunities for makers.  
2 Master planned communities that would be walkable/bikeable that would have  
mix of housing,  
retail, restaurants, entertainment and employment. Offices  
3 Help keep the natural environment both in the north eastern and south eastern  
parts of Moreno  
Valley protected from more unnecessary warehouse development. Too much  
pollution is already  
affecting the environment and residents in the city and we need to do the right thing  
by ourselves  
and future generations. Set a vision of a city combining both worthwhile business  
endeavors that  
can coexist with the natural beauty that our city is quickly losing. Beautification  
projects that  
highlight good design and nature are missing from our city.  
4 Again this is an odd survey. Surveys are usually written to get the desired results  
the proponents  
want. What are the desired results you are after?  
5 Moreno Valley needs a city center, a safe place that to walk around and have a  
meal or see a show.  
6 It is very important for the residents of Moreno Valley to have outdoors areas to  
enjoy. Please  
protect San Jacinto Wildlife Area. The panoramic views of mountains and hills  
looking East and  
South are beautiful! Leave these open areas in East Moreno Valley for all to enjoy.  
Do not fill up these  
are with warehouses. You cannot replace this lovely open space.  
7 A place is either safe or not. Feeling safe isn't safe. Being safe is. We need more  
police. We need less  
houses, and business and need to keep our open space. That will help keep us  
safter.... less density  
less crime.  
8 Encouraging community participation.  
9 We need to keep diversity and protect our remaining open area!!! Keep the high  
density housing,  
business and warehouses out of the NE end of Moreno Valley  
10 I don't want Moreno Valley to be safer not feel safer. We need a lot more police.  
I want the trails  
system completed prior to anymore development.  
11 I think dedicated bicycle lanes and horse trails in certain areas of the town make

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it more inviting to those with those interests. get rid of the carpool lane and let all traffic use it and then traffic would be better for everyone not just an occasional carpooler and Im a carpooler but I think this is better for air quality and life quality.

12 Safety has to be #1 on everyone's mind... As it stands.... no matter what you do, won't matter if residents do not partake due to fear of attacks by homeless or hoodlums just looking to take what they want. You have to get control over what's happening in everyone's backyard with the tents and sewage being spewed on city streets. The homeless people living like they are nomads with no cleanliness or proper sanitation is beyond disgusting and needs to be stopped.

13 We have many great arts programs already in place that the city does not value. The issue is at city hall and how they've used far too much of our money as well as staff time to assisting Benzeevi rather than the residents. Change needs to occur at city hall before there is any hope of creating a healthy city. They've doomed too many areas to low quality of life and respiratory problems for life.

14 More Water parks than the one we have

15 Events for families and children.

16 Stop the continued building of Warehouses. They do not generate long term jobs and go empty for even longer periods of time. Warehouses are not community growth but City Council gluttony.

17 Protect the rural aspect of MV

18 Get homeless people out of city and corners

19 A lot of this stuff will come IF there is more mixed use. Image housing at the mall and then farmer markets that you can walk to!

20 It is extremely important that warehouses and related trucks are not located within 1000 feet of people's living quarters, parks, etc. This is an important matter of health for the MV citizens

21 Think about more homes and parks and schools to support the homes. Convenient grocery stores would be nice.

22 I have been using the area trails, along with other residents here, for many years and would like to

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see continued access along with maintenance of the trails.

23 We need to BE safer, not just feel safer. Develop a better plan for neighborhood policing.

24 NorthEast, East and Edgemont Community Projects... Newer areas always seem to have a priority vs.

the above older historical areas of town.

25 City does not need to spend money to promote businesses or sports franchises. If there is money to

be made, they will come anyway.

26 Attract businesses like Trader Joe's etc

Rialto is doing a great job in attracting new vibrant business

27 Multi-use trails must be a priority to help promote a healthy Moreno Valley.

I have noticed where some developers have not been required to build out the multi-use trail that is

within their project's land. This must not be allowed on any future projects and these trails need to

expand to connect to the County and State systems.

The City must now go back and build/improve the multi-trail system in any place where they

allowed the developer to avoid their responsibility of making/improving the multi-trail system as

part of their project.

28 No opinion on more grocery stores, farmers markets, etc.. Make MV feel safer?

How about make it

safer! Given the gangs in the city: Good luck with that. Block parties: Given the gangs in the city: Bad

idea!

29 Safe place to park for hikes

30 People need to stop manipulating code enforcement officers to disrespecting the people there

suppose to serve !

31 Work with other cities and state to reduce homeless population (tied to myriad of problems from the

city's public image to theft and interference with business operations) -- get people into housing or

treatment centers.

32 There's sooooo much trash in Moreno Valley. Maybe a program with community service to clean up

streets, fields, and the highways. I hate that some of my flow citizens think that outside is a big trash

can. I would also like to see a crack down on Litterers.

33 Community policing where officers interact positively with residents.

34 Places for homeless to feel safe and off the streets. Maybe one park with

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restrooms and showers

35 More policeman on patrol on streets, use bicycle cops on neighborhood streets even consider horse patrol.

36 Community building activities

37 Provide and maintain safe and clean trails for us to enjoy.

38 Moreno Valley Community Center has amazing programs and classes for kids and adults. More

advertisement for these programs would be great. Reaching out to schools to provide these

programs on site would be awesome (arts, acting, sports, etc.)

39 All of the above

40 Making sure our stores, and schools sale non gmo food. Healthier choices

41 Would love to have a Whole Foods and/or Trader Joe's in Moreno Valley but they won't come

because of our demographics

42 Let the market dictate

43 Community will revive when people start feeling safe again. Their is high crime in this city and

people lose trust in each other. There should be a better relationship with enforcement and the

community

44 If the vagrants and criminals run loose it won't matter how nice it looks

45 Security cameras for multiuser trails. Need better clothing stores in the mall and more events. Need

healthier food choices at mall food court. Update Moreno Valley so we don't have to shop in other

cities.

46 We want REAL bike trails, not paint on the roads.

47 Library programs to connect seniors and kids, encourage the art of reading and learning. Proper

social skills class, what is right/wrong. Parents today do not teach their kids because they were

never taught. Community course for budgeting, how to manage a bank account basic life skills

everyone should know that are no longer taught in schools.

48 This has been a neglected part of Moreno Valley for too long.

49 Swimming pools for the town to engage during the summer. Speaking of which, maybe a man made

water feature that will cool down shoppers in a new town center with attractions and attractive

spending.

50 Working to attract a wider range of businesses which offer activities for children

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and families,  
similar to the escape room and Creative Brain Learning which recently opened. We need museums,  
performance spaces, art activities, pottery painting, interactive dining experiences, etc.  
51 Please, please, please can we get a Trader Joe's???

52 Fix the homeless, drugs, and theft issues.  
53 All of the above.  
54 We need walking trails in the mountains. I will improve health.  
55 Some sort of once a year celebration to attract people. Riverside has the orange festival, Beaumont  
the cherry festival. Some kind of once a year celebration that represents our towns history. To  
attract vendors and tourists

56 Provide trails to connect jobs with housing to encourage walking or biking.  
Balance job wages with  
housing development. A new \$32,000 job should be matched with a house costing no more than  
\$96,000.  
57 Get a Trader Joe's

58 I understand that everyone will say when it comes to crime that it happens everywhere but that is  
not true to a point. Crime is increasing rapidly and to combat that you need a strong police presence  
with increased patrols. I believe we are reactive and a City to crime rather than being proactive.

59 More trails, Whole Foods or Trader Joe's!

60 Moreno Valley has very little sense of pride. It's just where people live. People come home from work  
and just go in the house. Moreno Valley needs to be known for something other than crime

61 Safe streets, neighborhoods, and shopping areas are critical for a healthily community. Our City has  
some of the worst crime in the region. We can no longer blame State Propositions and laws for the  
rise in crime, as other regions seemed to have adapted to the new laws. Expansion of our trail system  
will offer a boost to a community but also connect neighborhoods to one another. Expansion of the  
Park system in District 2 is a must as many trails that run along the hills are located in this area.

62 Performing Arts Center and some art galleries.  
63 We don't want MV to look like LA.

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64 I have lived in Pico Rivera, East LA, Boyle Heights and Huntington Park and I have watched how the community leaders allowed those cities to turn into slums and looking like most Mexican cities south of the border. I see that happening here with unlicensed vendor selling food and even contraband goods. Next will come the real gangs and drugs. I wish for everyone to prosper in our community but not at the expense of turning us into just another slum.

65 Would love to see a park or bike trail around Moreno Beach and Ironwood. I feel you forget us out here.

66 More events at Lake Perris

67 Make Ironwood safer between Nason and Palm Middle School. There have been several serious accidents we need two lanes going in each direction.

68 Instead of making MV "feel" safer I and other residents would much rather have it BE safer.

69 I bought into a bedroom community 20 years ago and now the city planners are turning it into an industrial area. Bad mix. I'm leaving.

70 More than just 'feeling' safer- we need a dramatic increase in officers to make it 'actually' safer.

71 Increased police attention to our neighborhood and no more industrial buildings or Starbucks

72 Bike riding for families trails

73 While a sense of Community Pride is important, how many times do the citizens have to ask for a Spouts, Whole Foods or Trader Joe's? No, we get a Food for Less.

74 Improve schools, there are fights happening in public every day near the schools

75 Specialty parks for seniors/elderly/disabled to use. Safe, secure, centrally located, easily accessible. Provide training equipment, outdoor gym type equipment, safe walking paths some with handrails.

76 Use the mall to promote works of art in one of their empty stores. That art could be from our K-12 school as well as MVCC. Parents would enjoy seeing the work of their children and maybe spend some money at the mall. Performing arts are also needed and not just kept in the schools, but shared with the community. There needs to be more events that allow different local organizations to PR their group through tabling and this should also include local food vendors. I look at



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what other cities do and besides the 4th of July we are very sad.  
77 Senior/geriatric/adult parks with fitness equipment located near public transportation, city parks & rec center, centralized parks to provide the fit and semi fit elderly opportunities for safe and unique outdoor activity.

7. Thinking about the natural environment, please tell us if you think these things are a high, medium, or low priority for Moreno Valley over the next 20 years. (79 Responses Total)

- 1 City is not in compliance with State waste diversion regulations for mandatory recycling and organics recycling.
- 2 Pass an ordinance to eliminate noisy mufflers or noise makers that have been added to tailpipes.
- 3 Limit outside lighting to maintain the night sky views that have been so nice. Light near the warehouses and other heavy development wash away the stars. Incorporate sound proofing material on large expansive walls on warehouses to limit sound bounce into neighboring property.
- 4 Less warehouses will help with traffic congestion, air quality and noise
- 5 I think any positive environmental change is pertinent to the future success of this valley.
- 6 Limit development around our protected wildlife areas. The San Jacinto wildlife area shouldn't be disturbed and the pollution from too many cars and trucks affects everyone's quality of life. The center of Moreno Valley is already developed and can be improved and revitalized. The outskirts of our city will never be the same if we develop on our natural environment. Keep it separate and also incorporate cleaning projects to eliminate pollution and dumping in these beautiful areas. Illegal dumping happens all the time in our natural environments and we need to be more vigilant to stop this destructive behavior.
- 7 The Inland Counties are considered non-attainment areas for air pollution. How will this general plan reduce air pollution, reduce the use of polluting trucks, reduce trucks on the freeways, improve

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our traffic? How will this plan make our city's quality of life better? How will it preserve large lots for horse owners? Will it stop putting warehouses next to homes like you've done on Heacock & Ironwood? How will it preserve open spaces? How will it preserve the city's approved trails plans/system? How will it protect the northern portion of the San Jacinto Wildlife Area (which is adjacent to the city) where the state of California has spent millions of dollars to set aside lands to protect threatened & endangered species?

8 The beautiful views of the mountain ranges facing East and South are irreplaceable. Please leave the open areas in East Moreno Valley. The San Jacinto Wildlife corridor needs to be preserved. The openness/rural is what makes the Eastern MV special.

9 see my comments on last section about conserving open spaces. Thank you

10 Pollution, traffic, noise all can be lowered by eliminating warehouses, deisel trucks.

11 Making space for ECO friendly changes such as solar panels. Partnering with the college to find solutions to our everyday vehicle usage.

12 Protect our open spaces and unique views. Lower noise by reducing truck traffic. Reduce traffic by reducing the warehouses.

13 We need to stop covering up our land with asphalt and concrete it prevents water from perculating back into the water table. We need to keep the open spaces we have left. Prevent any more truck traffic from coming in and out of our city and get the trash company to collect and recycle plastic bags and wrappers.

14 Great choices above, become more conscientious about the environment for those that live here not the manufacturing companies that just pass thru with their trucks all the time. If you focus on quality of life for the residents, the value of living here will go up and we will change from being a commuter city to a city people want to live in like Redlands is.

15 We need to be very pro-active at this point to protect what is left of our open spaces. Many studies have shown how important open space is to quality of life. We need to protect our wildlife corridors

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and underground water as well as our hillsides. Too many very poor decisions from city hall have really destroyed many areas.

16 Keep our city as natural as possible!

17 Under noise we should consider the nuisance noise created on warehouse property that echoes out into neighborhoods. Does not exceed the decibel levels for problematic noise but it still annoying.

For energy usage it should be mandatory that all large, flat roofed, buildings provide a minimum percentage of solar installation.

18 OTA TV broadcast Signals - work with Riverside county to increase Over The Air (OTA) broadcasting coverage from Box Springs or elsewhere. Many residents in Moreno Valley are victims of no choice of cable provider and pay ~\$200.00 monthly for internet and TV signals that are freely broadcasted, but are difficult to receive in Moreno Valley. Conversely, require that cable companies not charge more in places with only a single provider than they do where there are two. They are essentially holding those residents hostage to a lack of market competition. If you only have 1 cable provider, you can live across the street and pay 2x your neighbor who has 2 options. There are online maps where you can see providers for cable and internet in MoVal

19 Lowering water usage and then the water districts charge you more, how does that make sense?

Also why are we stuck paying for upgrade to infrastructure that they should have been doing all along?

20 No more warehouses!!

21 Riverside has one of the worst air quality in the country (122 unhealthy days of ozone pollution during 2014-2016). Every effort needs to be made by our city leaders to improve this quality of air by emphasizing businesses, manufacturing and investment that reverses this trend here in Moreno Valley. Just a reminder that unsafe levels of fine-particle pollution affects all population, specially kids and teenagers (more visits to hospitals, asthma), and the elderly (twice likely to develop dementia and Alzheimer's disease).

22 Reducing truck traffic

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23 Waste is a huge problem and expanded recycling efforts could help. A big problem is junk/trash dropped along roadways and open spaces. We need monitoring and harsher fines for people who violate littering laws.

24 Noise is inevitable in a growing city like ours.

25 Litter! Renew our pride in our city. Reduce the carelessness of littering our streets and neighborhoods.

26 Some already and traditionally designated Commercial Traffic Use (i.e. Alessandro Blvd. East of Moreno Beach to Merwin), a Residential and Low Impact Commercial Post Office and Small Stores) is a MAJOR connection for Trucks, Semi-Tractor Trailers, Bob-Tail Trucks, and Commuters (both, from Hemet/San Jacinto areas in the AM... throughout the day... and, particularly at 5-7 PM, although, occasionally at nite till 11 PM) drive along a narrow two lane asphalt road, decrepitely falling apart and inadequately designed for heavy duty (weighted) vehicles, decaying, potholed... Allows the actually non-filled containers and trailers to unnecessarily BOUNCE upon the roadway... You see... the NOISE of the motors and trucks themselves are hardly the issue. The primary source of noise is dispersed by the audio... shock waves... tremors on the poor and inadequate roads through this RESIDENTIAL AREA into an undeveloped, planned Warehouse (WLC) area East to Gilman Springs. TOTALLY UNACCEPTABLE DESIGNATION OF A ROAD... INADEQUATELY POSTED SIGNAGE... INADEQUATE STREET CONTROLS (a 4 Way Stop Signage at Alessandro Blvd. and Redlands... programmed to remain the SAME through later than 2030 according to the WLC EIR, Transportation Annex...). REALLY?? REALLY?? Irregardless, the folks at the City Planning and Transportation maintain the Route should maintain a Commercial Use, the POLICE DEPARTMENT, which five (5) years ago had been given the go-ahead for funds to implement a COMMERCIAL VEHICLE ENFORCEMENT TEAM... (Refer and contact Beaumont P.D. who had implemented such a team with personnel, a City PD Truck with throw-down weighting equipment over

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ten (10) years ago.  
Today, the City of Moreno Valley has failed to implement a meager effort to regulate such X Commercial traffic, despite an increase of such traffic at over 500 percent... (I'm sure it's more... where's your folks figures)??!  
27 Reduce particulate pollution by eliminating future warehouse uses in the city. Protect the San Jacinto Wildlife area by keeping high traffic uses well away from that southeast part of the city.  
28 Keeping our natural and open space is key to the essence of Moreno Valley.  
29 Lessen dependence on SCE  
Clean up landscaping and create more landscape districts making the city more attractive  
Make absentee landlords responsible for overall condition of properties similar to Azusa. Use the update to create city wide standards allowing ordinances to be strengthened  
30 Having a large park which is mainly passive is important. A place where families can go and have a picnic or BBQ or throw a Frisbee or just play catch, but not any organized sports. With more and more housing placed on small lots, families need such a place. Moreno Valley is fortunate to be next to two State facilities. Lake Perris State Park and the San Jacinto Wildlife Area. We need to make sure any land uses permitted near these places do not impact their resources in any way. It cost \$10 to enter Lake Perris which is all the more reason we need a large passive park for our Residents. To many \$10 is better spent on food and/or rent and/or medicines.  
31 With the building of several warehouses, brings Big trucks. My concern is the poor air quality this will cause. Please consider all of these health issues, when approving the City Plans.  
32 Lower rent  
33 Crack down on people shooting fireworks off all year. Get a better police force.  
34 All of these things cannot be accomplished by adding high density housing, condos, apartments, warehouses, which increases traffic, air and noise pollution as well as water and energy demands for a community built in a desert! Shade is great, but I've lost over 20 trees that provided shade to

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reduce summer energy costs due to increasing water rates. A majority of the city looks run down with dead yards because residents can't/won't afford water rates. I bet city water rates are lower than mine. How fare is that?

35 Offer more recycling places to except more products to take your recycling!

36 Keeping large trucks off of neighborhood roads.

37 We need to have a community compost, need to have more trees black asphalt is hot and makes everything hotter

38 Giving tickets to people who break the law! When the street sign says no parking no stopping that's what it means but the police seem to look the other way, example is at the schools. Double parking parking on the corner of intersections

39 Maintaining all medians and easements

40 I love our parks and nature that you can't find other places. Our wild donkeys and fields make us unique and should be maintained and protected.

41 Better water

42 We definitely need to be green

43 Also another reason why I don't like Moreno Valley is not feeling safe here anymore for my children

44 Promote a sanctuary to plant trees and give more to combating harmful pollution.

45 None of these are governments concern

46 We have a great lake in our community. City should promote it more while also educating the community about taking care of it

47 More police patrol.

48 Keep MV landscaping, parking lots clean. Side Note: Police need to cruise neighborhoods at night in the areas where the mailboxes are broken into.

49 Recycling bottles has become an issue. We no longer have a place where you can go to a wall, put bottles through and get paid. Re-plant was the best. I lived back east and some grocery stores had several of these machines. It was great!!! One store limited bottle count to ensure others have a chance had someone monitoring and working the area

50 Sadly,Moreno Valley has gotten much noisier over the years. It used to be a quiet place to live. Now all you hear is traffic noises.

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51 Let businesses progress without hampering

52 Providing easy access for other worldwide visitors to visit our city I'm think inactive march air force base be made into an operating commercial airport that would boost the economy and link it with the California rail system to cause economic traffic onto our west side and all over.

53 Reducing amount of semi trucks around town.

54 Plant more trees!!! Enforce the law for those who litter.

55 The air quality is an issue, but what are you going to do because this is all blowing in from other areas.

56 Please plant more trees. Riverside has many nice tree lined streets. We need more trees especially in the housing tracts around Moreno Valley High School and in front of the block walls that separate homes from major streets (Cottonwood, Graham, Eucalyptus, etc.)

57 Promoting solar

58 why were all the Pepper trees cut down in the shopping center on Sunnymead? They provided shade for all. It turned that parking lot into a desert in the summer. If you are so concerned with creating cooler streets, why were those trees eliminated?

59 The only problem is with more trees and vegetation, of which would be lovely and feel homier, the homeless would consider them as new places to camp :(

60 Too many trucks. It seems air quality went down with all these new factory type business. I know it helps with jobs but they use public transportation. They need an alternative road to transport these trucks.

61 Balance development to include jobs, schools, shopping and housing in walkable communities.  
Balance jobs with housing affordable for the job wages within walking or bike riding distance.  
Reduce private maintained yards in residential areas in favor of community park spaces and community gardens.

62 Less truck traffic

63 Local air quality will be significantly impacted by World Logistics Ctr... no more warehousing

64 Moreno Valley has a lot of young people whom like to install loud mufflers and race around all night.  
This needs to be addressed. Another problem is year round fireworks.

65 These questions are so obvious - why ask? Yes, of course, every humans wants

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better air quality and less noise pollution. Make sure the new General Plan intentionally designs these elements into the Amendment.

66 Make the warehousing trucks as clean as possible.

67 Traffic noise is horrendous. Since the 60 and 215 barely move during traffic hours, Perris is highly traveled. Though I am several houses away from Perris, instead of hearing birds I hear traffic.

68 Put a moratorium on building in MV until we have sufficient water to not need restrictions. California needs to increase our water resources before any further homes or businesses are built. No city should outbid its water supply. Taxes and restrictions are politicians' way of making excuses for piss poor planning. Why build a train to nowhere? for billions that money could have built an aqueduct to Oregon problem solved.

69 I have watched how many streets have dividers or islands and I think that is a good thing. But I do not believe having vegetation in them is a good item. That requires water and so often that water ends up in the road and causes the road to deteriorate. Which means we have to spend money and manpower to repair them.

70 Stop the all night building on Moreno Beach and the freeway. It's so noisy all night long.

71 Make it cheaper for homeowners to obtain building/ construction permits.

72 No more warehouses will help alleviate a lot of these problems.

73 This category is unbelievably facile!! The choices don't really have anything to do with the natural environment at all, but all have to do with making people more comfortable - more shade? Come on!

74 Lowering water/energy use should be very low priority- restrictions for development before residents.

Recycling and composting does need to be promoted and encouraged.

75 Make Industrial projects responsible for all their air quality and traffic problems. There is no way to mitigation actually covers the damage created by the warehousing and trucks.

76 Recycling should be compulsory

77 Requiring city properties to conserve water, not allow water runoff or overuse sprinklers. City



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employees using city vehicles to obey all traffic laws - turn signals, safe lane changes, no tailgating or speeding, lights on when raining or low light, no texting.  
78 City properties must take the lead in water conservation first by not permitting water runoff and over usage of sprinklers on city property. City employees provide better examples of safe driving by abiding by all traffic laws, not texting, speeding, tailgating, always using turn signals, avoiding unsafe lane changes.  
79 Protecting our open spaces, natural resources and improving air quality is important. Yet you continue to destroy our environment by having more companies build warehouses???

8. Do you have any other thoughts to share about priorities for the future of our community? (272 Responses Total)

- 1 Plan should incorporate climate change mitigation and adaptation. Also, future development should not be at the expense of my family's health - no more warehouses and dirty truck pollution. Focus on making our lives better in the long run, not short term and short sighted development.
  - 2 We also like retail shopping centers and including restaurant development. We know job creation, commercial development and new technologies are important for future progress.
  - 3 There must be a balance (not 50/50, but what would synergistically work) between creating and sustaining a city life filled with energy, attraction, productivity and harmony for residence and visitors to live by and enjoy.
  - 4 Improve the quality of education and educational programs at the high school level.
  - 5 If we choose to continue approving warehouses then we should be come a green, carbon neutral city and require total rooftop solar on all future development. Require all on-site equipment/vehicles to be electric.
  - 6 Housing diversity. We need a mix of apartments, Condos, 1st time homebuyer single family housing, move up housing, large lot rural lifestyle housing, and luxury housing, to draw a diverse population.
- I have lived in Moreno Valley for 32 years. I was able to afford my first house, raise

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and educate my children, have my spouse get a good career in the school district, and be a good place to come home to after my hours long commute. When it came time to "move up" I had to search outside the city to look for the type of housing I wanted to aspire to due to the very limited inventory in Moreno Valley. I was very fortunate to find the needle in the haystack when I was able to acquire my current home in Northeast MoVal. The large home and 1/2 acre lot pool home fit my "wants" for a move up home. We should aspire to build more of the same in this area to give our residents opportunities to grow and stay in Moreno Valley. There is plenty of land for denser tracts in other parts of the city. Let us keep the zoning that I and so many other residents love and was the reason we moved or stayed in Moreno Valley.

7 stop building warehouses, there are already too many.

8 The City has to keep maintaining what it has. Adding new items without ongoing maintenance is a waste. Need to slurry seal and maintain local roads on a more regular basis. Often left until too late to save and slurry seal over roads which are beyond repair. Waste of dollars.

9 No more warehouses!

10 Distract and discourage criminals and people and businesses that depreciate real estate values. No more warehouses.

11 I wish it wasn't as ghetto

12 Please protect the east end of town. It is one of the last rural, peaceful areas we have left out here. There is no need to fill our city with concrete warehouses. We need less traffic, pollution, and crime.

13 Don't bring more warehouse and logistics centers to our city. There is still a chance to make this city beautiful and keep a balance with nature. Who wants to live with constant pollution and a poor quality of life? If I wanted that I would move to Vernon. Do right by our people and don't forsake our city with this continued warehouse infatuation.

14 Priorities should be to listen to all residents not just special interests & developers building

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warehouses. Work to communicate better with residents and let them know that their concerns are valid. Telling residents that there is only one way to do things, i.e. that warehousing is the only development that will bring money to the city is absurd. You've lost the support of residents by cramming the WLC & warehouses down our throats. I don't have much faith that this survey, general plan update will be much different. I've sat through two updates of the city's general plan already and I don't believe that this update will do much to reflect what residents want or their concerns.

15 I love our city, please do what is best for Moreno Valley, to keep it a nice place to live.

16 This city was a jewel decades ago and had real potential. Right now a new administration would be most welcome!

17 Please do not turn our lovely city into a sea of warehouses.

18 Clean our City of homeless instead of bringing in more in

19 The future looks bleak.... filled with concrete buildings, warehouses, pollution, traffic.... that is all you can see now.... it must stop!

20 This survey should be for those who live in Moreno Valley right? What is to stop Benzeevi and his

crooked cronies from gumming up this survey with multiple submissions saying how wonderful

everything is and they want more traffic, noise, pollution... ect...or anyone else from going on and

participating ... how can you limit it to one per family member that lives here. Why isn't there

anything about how they want to make vague loosely written rules regarding zoning such as "flexible

zoning".... BULLSHIT!!!! Sorry, but really?

21 Put new business into areas that have not succeeded and are empty. Wilderness park/open spaces

in the NE. Moreno Valley. Keep the high density and business to the South South West and West end

of Moreno Valley. Connecting our trails.

22 We need to protect our environment. The San Jacinto Wildlife area needs to be protected from

diesel particulates as do the citizens in Moreno Valley.

23 Zoning needs to create job diversity and not be limited to mixed use, industrial,

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and residential.

There also should be design and public art oriented to local history and a great variety of

recreational facilities spread across all areas of the city, not only in select areas.

24 Get rid of the transients, drug users, and gangs. Stop letting other cities bus them to our city limits.

25 Protect open spaces as public parks to increase outdoor recreation options. Build new dense

housing in infill areas ( like the Aquabella project area that will never be built) and keep large lots

for rural/executive housing in northeast area and along northern Pigeon Pass.

Increase diversity of employment options.

26 Safety

27 Moreno Valley has a bad reputation for good reason. Things will only change when this becomes a

safer place to live. We don't even have a nice main street type area, Sunnymead Blvd is an eyesore.

Look at Redlands Orange street as an example of what main street should be. Create somewhere

safe for people to go out with their families.

28 The first priority of the community is to bring new companies and security for the residents with

educational opportunities.

29 Some priorities that we need for the future of our community is creating more stable jobs.

30 The homeless crisis has to be curtailed.

Either through admission to mental hospital or removal .... as many of them refuse to go to shelters,

get real help to get off the streets, or get jobs.

If they aren't willing to work at get off streets, we need to be arresting for loitering and remove

them permanently! Send them someplace else like New York, Los Angeles and Orange counties are!

31 Return honesty, integrity, ethics and morality to city hall. Listen to the residents not the developers

who are leaving us to clean up all the negative impacts while they fill their bank accounts. Stop

giving so many incentives to certain developers.

32 Moreno Valley should become a charter city. We, the staff and council should stay focused on the

general plan land uses and not making changes anytime someone asks or the market swings. It

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they don't stick with a plan the city will not achieve what they desire.  
33 plant more trees.  
34 I have outlined them in the other comments. Most importantly...  
Tier 1:  
-Attract tech jobs  
-De-prioritize warehouse and low-paying factory jobs  
- Improve public transportation options.  
- Address traffic on the 60 that has resulted from using the IE as a logistics hub.  
This CANNOT be fixed by adding new lanes... Drive 91, 60, 10, 210 and you will find areas where there is between 10-16 lanes of traffic (both directions) and traffic is still at a standstill.  
Tier-2  
OTA television broadcasting signal ("low hanging fruit") that will save many MoVal residents up to \$600/year by allowing the use of antenna for TV.  
-Parks ... use wild spaces for community park land  
35 Less warehouse and industrial development and more business office, retail and housing development.  
36 I have been a resident since Sunnymead unincorporated days. Was really excited when we became a city. Unfortunately things have gone down hill. City council has approved mega warehouses, increased truck travel, no vision of a city center or community identity, and lost the opportunity to take an incredible place to live and turn into an affordable housing Mecca and a host for mega business warehouses. MV government has been shortsighted in believing that warehouses and trucks would create real jobs and economic opportunity for our community. As a long time resident this is the saddest legacy of our city leaders. Unfortunately I don't encourage my son to see MV as a place to grow his family. Under the current circumstances we are a "one" generation MV family, sad!  
37 Get a grip on the homeless.  
38 we need more job opportunities, and have waited for a long time.  
39 We need to attract more higher quality stores to Moreno Valley, in order for people to buy and invest into they're own city.  
40 Be more business friendly

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41 No more warehouses and clean up the city , more police and tougher on crime  
42 Homelessness is out of control. Crime is out of control. Trash and dumping is rampant.  
Sunnymead Blvd is more like Skid Row. Let's improve!  
43 I come from a similar sized community in Abilene, TX. We had three private universities and a community college that networked with museums and libraries across the nation. We had a CALF festival for literature and celebrated an author and illustrator and had universities get involved. We had a monthly art walk with vendors and free entry to the museums. It brought the community together, developed downtown businesses and brought outside exposure in. They worked on putting up sculptures from different events, working again with the universities. The libraries worked together across their three branches and offered different daily events and free arts & crafts. They did summer camps that involved actual events and more than reading and getting a prize. We homeschooled for some years and were heavily involved with our libraries. They had a writing club for young writers that actually put on productions from pieces that they had written. They started doing a local lib-con which was our version of a comic con, even doing a fashion show for cosplay and having different events and workshops geared toward everyone in all different genres. It wasn't just about shopping, but about connecting across interests and business could get involved and participate, but not for just marketing. It really was about community. HEB was a local grocery store that hosted an annual Thanksgiving dinner free of charge to the entire city. There weren't tickets or limited seating. Different nonprofits would do pancake dinners and raise money in the civic center. IHOP would donate the pancake mix and get the publicity. It seems like there are a lot of missed opportunities for the community to be tied together and for outside revenue to be brought in as well. Moreno Valley has surrounding communities that would come - Hemet, San Jacinto, Perris, Riverside, etc. We had a city philharmonic, an annual

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Nutcracker  
production by a ballet company that also included a Nutcracker Tea put on by the Women's Country Club - ticketed event. Our dog park hosted events, like a mardi gra parade and such to raise awareness and funds for the local shelters. These aren't things I'm aware that are going on with Moreno Valley.

44 How about getting a food hall and outdoor entertainment space at the mall or other town center before all the other cities around here?

45 No more warehouses until the streets and freeways are more accommodating

46 No more warehouses

47 Warehouses are empty in MV. Newspaper articles state logistics facilities have been overbuilt. MV is going to be stuck with empty warehouses for centuries if the trend goes on.

48 Modernization of the City to stand out from other Cities, unique development designs to create landmarks that will be recognized in the State and the nation and will make Moreno Valley an attractive destination to live, work and play.

49 Questions do not address the need for sustainable growth during the next 20 years. Questions should include the ability of citizens to give opinions on the following key items that will determine our how healthy our future will be:

1. Build its own renewable energy resource (solar/wind/battery) to serve all of its residents, and sell any excess energy to the market;
2. Conduct an extensive effort to plant trees in every major street in MV, and more trees in existing parks;
3. Emphasize limiting the carbon imprint in the City by cutting back consumption, based on City policies that support new technologies, and make them available to residents;
4. Policies on businesses/industrial parks should consider the sustainability of our immediate future generations (within 20 years), and with a consideration that a sustainable future calls for a goal to be carbon neutral before 2040.

4. Meals prepared for school children and seniors at public centers should be healthier, with less meat juices, and more herbal teas, water, fruits and vegetables. This is a matter of

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health, and of  
taking care of our planet.  
Climate change is an existential threat, and MV can lead the way by setting annual  
carbon emissions  
targets for the City, and for each MV citizen.  
50 This has always been a bedroom community. It seems that people that are  
making decisions now  
are being guided by money or trying to turn this into a different place than what we  
wanted to live  
in when we bought here.  
51 Air quality and traffic is horrible in this area, especially in the summer months. I  
developed many  
allergies after I moved to Moreno Valley/Inland Empire over 30 years ago. We  
don't need to make  
it worse by promoting proliferation of business and traffic which will only increase  
health problems  
caused by pollution which drastically affects children, the elderly and minority  
populations. Thank  
you.  
52 reduce crime in the city and have programs that help home owners get free trees  
to go green for a  
better environment  
53 Be a business friendly city in all the extension of the word  
54 Retaining the natural beauty of what remains of the city and support initiatives  
for quality of life,  
health and natural spaces.  
I read of a community that reduced the over abundance of city and street signage for  
cleaner city  
feel and didn't detract from natural spaces and views.  
Having resided in this city for 30 years and seeing the growth it would be nice to  
expand the beauty  
and quality of outdoor space so that no matter where you lived you could safely,  
and easily access  
those spaces in an around your neighborhood.  
I have appreciated how the city has managed to keep up with growth but the  
overbuilding seems  
now to impact traffic, loss of open space to building repetitive type shopping  
centers. Older  
shopping centers in decline and take away from positive refurbishment and use, and  
beauty of the  
city.  
Thank you!  
55 Personally, I am a retired Law Enforcement (Riverside Sheriff's Official), who



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just happened to  
spend over seven (7) years working the Community Planning Team Leader at the  
Jurupa Valley  
Sheriff's Station... My views on Drew recommendations are of course, my own.  
However, the  
fairness in my observations as a long-time resident in the City of Moreno Valley are  
based upon my  
training and experience. Continue to allow short-sided Politicians, who lack the  
education and  
training for Planning, hire the lowest skilled and cheapest paid folks with 'no balls'  
to the Planning  
Department... I can project that by my death over the next thirty (30) some years...  
Without change  
of direction, attention and follow-thru despite administrative changes... this city will  
continue a  
downhill path and eventually end up like the City of Commerce in Los Angeles.  
56 Municipal broadband, and a municipal electrical utility would vastly increase the  
attractiveness of  
Moreno Valley to the types of businesses we need. And we need more libraries for  
the rest of us.  
57 Publish this. And seriously, get the logistics industry influence out of our city's  
governance.  
58 Have more programs to save Donkey Land.  
59 More home communities with larger lots.  
60 No manufacturing of tilt-up bldgs in the Northeast.  
If building single family homes; all should be no smaller than 1/2 acre lots. No  
townhouse or  
apartment complexes.  
61 Creating areas to foster more community involvement, more gathering areas  
with shelter from the  
sun in the summer for festivals, farmer markets, outdoor theater, etc.  
62 Investing in our parks, not touching our natural land and keeping our kids safe at  
all times. I also  
would Love to see residents attending local city classes to improve our homes,  
saving water, kids  
activities, etc  
63 Begin recertification on the central part of Mo Val  
Housing stock is aging out  
Create a unique shopping experience in Sunnymead Blvd similar to Monrovia on  
Myrtle Ave  
64 Moreno Valley needs to require higher standards of development from  
developers. We need to  
produce a city in which our young want to stay/return and one in which we can

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offer them something other than a warehouse job. Even Yucaipa seems to be slowly requiring higher standards from developers than us.

We live in a non-attainment area where air quality is a health problem. We need to be provide land uses that do not add to our problem. This includes a long moratorium on warehousing. Diesel trucks are not clean and even the new ones are unhealthy when we allow 1,000's of them into our City every day.

Affordable housing is important, but they need to be placed near transit centers, bike lanes, sidewalks and bus lines.

We need a mix of housing on all size lots so people can stay in town as they increase they financial worth. This means we need homes on 1/2, 1, 2 and 5 acre lots in a portion of our City. This also allows for business owners to live in the town of their successful business.

How much land is available for non-warehouse jobs? We need these lands because they produce many more jobs per acre than warehousing. It is these lands that will eventually reduce commuting for our residents.

65 What is the city doing to care for the homeless in our community? I didn't see any questions about what the city might do for the many homeless I see throughout the city.

66 No more warehouses, and fewer trucks!

67 I have lived in Moreno Valley since I was 10. I'm now 37. I have all my kids in the school district but want to buy a house and can't. More houses being built is our top priority and it is very important that they are not overly expensive.

68 As I stated in the previous comments, I am concerned with the number of warehouses in our city, the number of trucks that will coming through will effect all of us, but particularly our future generations of children.

I have a 10 year old granddaughter who loves to play outside. If the air quality continues to deteriorate it will and can cause permanent damage to our families.

Please consider these things carefully, as it impacts us ALL.

69 I need better freeways for these truck drivers. Need to stop building warehouses

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Moreno Valley  
School reverse side freeways are not big enough for the traffic  
70 Rent  
71 We need people in office who aren't about gloating in regards to useless "achievements" that aren't helping our community. As a local who was looking for a job 2-3 years ago, for a city of 200K+ there were little to no IT jobs available. We need to focus on cleaning up the streets as well. I get this may be a difficult task, but when I see "Homicide" on crime report down Sunnymead over and over, what are we actually doing to make MoVal a safe place to live? Raising prices of rent to outrageous amounts isn't going to bring people with more money in because MoVal currently isn't a desirable location. I think the fact that I have little hope that people are even going to read these surveys is another problem; people need to know that the local government is going to take action and be trustworthy. I think it is no secret that the government of MoVal has been corrupt in the past and may still be. TRUSTWORTHY should be a GIANT goal for the local government.  
72 Do not want the city to be a city of warehouses. We have to many now.  
73 Get a better police force, get rid of the crime.  
74 Would like to see east end of city remain 1/2 acre lots. Been here 33 years and love it.  
75 Moreno valley seems to be at its lowest point in a long time. The city is overrun with neglect (potholes, abandoned buildings, traffic, poor schools, trash, etc). This doesn't reflect well on current council members. Business will come when the city is pleasantly appointed and well run.  
76 We need a better mall and better shopping areas. Look around you and you see and feel old. There isn't a lot of new and remodel buildings. When you step out of the " " Good neighborhoods the rest of moval looks and feels old and getto.  
77 Our community would be much stronger if there weren't such greedy individuals in city hall.  
78 Moreno Valley is already a really well built town with amazing people who fill in our community.  
What we need to do is continue our growth and make our city safer and more enjoyable.

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79 The natural environment, wildlife and the quality of living in MV will be at risk if more warehouse, dense housing, apartments, and condos added. The remaining rural parts of MV should be preserved. If the cities goal (as I believe) is to get more tax revenue from adding business', try for high tech/professional companies. Try to minimize population growth and limit additional traffic.

80 Fix the roads. Encourage the owner of lakeshore village to divide the old ralphs into multiple spaces to attract more tenants. There is too much crime in that center. If we can get it filled with quality tenants and get more daily traffic it will drive away the gang members and build more pride in our city.

81 I made this suggestion several years ago the last time you asked for input. The big unused store in the mall: especially since its right next to the bus travel center. This is the perfect place to have a multi-purpose community facility. Use the lower level for Veterans services and monitored Senior Day Care. And the main floor for students: library, study center, weekend monitored teen center, teen parties, after school child care, etc. Yes it will cost but get the mall to donate the space and point out this will increase their foot traffic.

82 Please do not change the golf course area. Those of us with homes that back up to the golf course do not want to change our views or the peace and quiet we were looking for when we purchased our homes. The Ridgecrest area is such a nice area and we do not want businesses or more homes to be put into the space where the golf course is. If you must, turn it into a gated walking trail or some other type of peaceful natural space. I really don't want to move but my quality of life is worth more than keeping my home if you decide to turn it into a public park or build homes/apartments or businesses in that space. Don't let us down!

83 More law enforcement and fire fighters

84 Yes we need to hirer more honest people to work here! Outsiders don't care ! Code enforcement is abusing that power ! And the city needs to vote new people ! People who have a

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stake in the community! That are not going to leave the minute they make money and raise tax's that hurt the residents! They need to live within there means ! And stop abusing there time in office! This city has a serious problem with schools and politics ! More will leave and no one to pay for all the things everyone demands on having that aren't necessary! We need to get our priorities Straight! The city needs to stop with the tax's ! They are taxing the residents to a point they cannot live here !

85 Maintain current areas zoned for large lots for animal keeping. Develop denser housing options to fill in already-developed areas.

86 Funding for good teachers and students materials and programs

87 Fire the mayor & his misfits

88 I love Moreno Valley. Let's just clean it up.

89 60 and 215 need critical attention toward expansion. These freeways are a mess and affect quality of life here for a good part of the population

90 Encourage apartment complexes to enforce a no-drug / no marijuana smoking on premises, based on federal law. CA was stupid to legalize marijuana.

91 More money needs to be spent on sprucing your major streets, freeway entrances and exits. Cleaning up Graffiti and establishing a farmers market night.

92 I commute daily to Ontario for work in a Biomedical as a Chemist. Traffic is my main issue. I would like to have more lanes or perhaps more available & affordable public transportation. Or even better, have more job opportunities at Moreno Valley in the Biotech, Biomedical and Industrial fields.

93 Curtail vehicle speeding and noise.

94 We need to look at being a forward thinking town, cutting edge is a great thing. Building roundabouts have been shown to reduce traffic and are safer. Make More o Valley a green community, community gardens, lots of shade. Get rid of the gangs, increase cops and get our community to be a place where people want to live here and not have people apologize for me living in MoVal

95 Traffic ruins the entire experience. The state/cities need to build an alternate roadway from Perris

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West thru or over the hills and into Irvine/Orange County. Event the 91 is a nightmare no matter how many "lanes" they put in. Also a larger road that would go directly straight to Loma Linda instead of Ritchie Canyon.

96 Updating maps-no gps service or website gives you the accurate location of the "M" trail, public transport-SoCal is the worst at this. Driving shouldn't be a necessity

97 Create better jobs that would attract people to live and spend their money in this city

98 Fix this city up, get rid of the gangs and make it safe, attract more high end restaurants and shopping! Re vamp sunnymead blvd

99 Clean up the getto areas of the city, we pay enough in property tax, utility tax to employ enough people to keep this city looking great.

100 Ticketing people with diesels in their yards, streets. Tickets people who park cars on grass and more than 5 cars in driveway non operating. Citizen patrol ticketing neighborhood who had nasty yards and drug dealers addicts.

101 I feel that as we have brought more warehouses into the community there are more trucks on our roadways and highways. They are not built for that amount of traffic.

102 Stop bring and allowing development of warehouses in out community. They do not offer jobs with a livable wage. Help curb the homeless problem.

103 Promote larger lots with animals on the east end of town. Make it dual country area for ranges 1 to 5 acres

104 No more warehouses!

105 It's great how the community has thought of the youth in the past by building a skate park but I think we need more activities for the youth. Also we need to think of affordable housing or programs to help people who are struggling to live decent in moreno valley.

106 More money needs to be spent on maintenance and security around businesses. Sunnymead Boulevard needs to be cleaned up badly! It looks disgusting. Homeless people are every where. The businesses in the 2 shopping centers on Perris with Food 4 Less and Dollar Tree need to be cleaned up. It feels unsafe and there are homeless people everywhere. I don't shop there

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anymore because  
it feels unsafe and dirty.  
107 Invest in culture, education and housing  
108 With the amount of warehouses there should be more streets where truckers  
may be able to park.  
Less restrictions if they park in an private parking lot to grab something to eat or  
grocery shopping  
or at the gym to exercise and shower.  
109 Safety needs to become a priority. The crime in this city is out of control. The  
wonderful community  
that was Moreno Valley is gone and replaced with low wage warehouse jobs and  
crime.  
110 More cameras on the streets. Police in the area. Especially after schools and  
before.  
111 Provide housing development for homeless, to alleviate them hanging out on  
the streets.  
Repair the streets  
Change the timing on the traffic  
Lights to alleviate people running red lights  
112 this town is dull. I would like to see more nightlife and weekend entertainment.  
Please stop painting  
every building being built like apartments, shopping centers etc, every shade of  
brown you can  
think of it is a depressing color.  
113 More speed bumps around schools. More police patrolling  
114 Please stop letting Moreno Valley be run down where it feels unsafe and being  
compared to Perris  
115 No  
116 Finding solutions for homelessness  
Expanding police force  
Promoting Community  
117 We need homeless out and crime need to come way down. It's bad here. It's  
not what it use to be  
118 Stop letting big corporations buy land and build their warehouses. Moreno  
Valley is just warehouse  
city. No beauty. No plants or anything fun to enjoy or go out to. Just warehouses  
every corner.  
Horrible city this has become.  
119 I think the biggest priority for are residents is making them feel safe in our  
community. And also  
improving are roads and making are city modern by cleaning up old shopping  
centers and bringing  
live to them

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120 Jobs that pay more than minimum wage.  
121 It's seems like we take one step forward and the low life thugs destroy it. It's getting very old. The homeless are in the nice neighborhoods and are threats to children and people out walking.  
122 More trees, no more homes being built until roadways are upgraded to match traffic density, get rid of section 8.  
123 Moreno valley needs to not waste money on stupid projects.  
124 Fix streets  
Make moreno valley safe  
125 We should give our town a uplift and make it look new and fresh  
126 More healthy food choices and stores (e.g. Trader Joe's or Clark's)  
127 Get with the mall to help it grow! There is potential there with help bring in more money from taxes!  
128 Higher security  
129 More police needed  
130 We need more police officers, better teachers in our schools( with better pay). Better parks ( where we can all feel safe). Cleaner streets and Less homeless.  
131 create more outdoor, fun recreational spaces that are safe with stores, restaurants that attract people. Bands that can play, water features where summer nights would be a great place to grab a iced coffee, or ice cream. Redlands does it well as does Orange County and San Diego. We need better restaurants.. Boudines, Stone Fire Grill, Pei Wei, Luna Grill, Bagel shop, Trader Joes, or Sprouts, Yankee Candle shop, Nothing Bundt cakes etc. We need a middle to higher end center with anchors to bring some better shopping. It needs to be lit and safe. Another area that does well is Canyon Crest Town Center. People are out, walking around, hanging out, being part of a community.  
Mo Val needs that too.  
132 I think the quality of life in this city is very low compared to other cities in Southern California. Low paying jobs and lack of opportunities drive many community members to drive 60+ miles to find better jobs. As a result, we see a lot of traffic on our local roads and highways. People need better jobs than back breaking warehouse work that will eventually end up taking a toll on



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our city (roads, injuries, higher welfare costs)  
133 Moreno valley has great potential, there is a lot of vacant places for potential business, but also so much crime. We have many struggling families that can benefit from vocational training in order to obtain a better job. Our schools we likely not build for the amount of kids they have today none the less in 20 years. Younger children from lower income families tend to have poor diets, and the free lunch program I think really helps many people. More farmers markets with incentives for lower income families would really get fresh fruits and vegetables to under privileged kids. Getting our homeless population under control before it becomes worse. There are so many things that we can do to better our quality of life and the overall presentation of our city, community clean ups of parks is a great way to involve people in something that makes a difference.  
134 Moreno Valley needs to improve the safety of the city. Something need to be done with all the drug and homelessness. The gangs need to be ran out. This city is ghetto. The schools need to improve on the bullying issue, I was bullied 9 years ago and it hasn't improved since  
135 NA  
136 HELP THE HOMELESS  
137 I really like how law enforcement does the quality of life sweeps periodically. I think theres lots of riff raff in this town and by doing things like that it will keep people more aware that they will get caught and it will keep our town safer.  
I hear lots of complaints about the time it takes officers to arrive when someone calls 911 for assistance.  
Clean up the homeless situation  
Oh and mail box theft is out of control!! Something needs to be done about that.  
Fix roads that actually need fixing.  
138 Road work done by city workers should be done as fast as if a third party were doing it. Jobs take the city weeks that would take a 3rd party days to complete.  
Also school safety. Not only the bullying but the parking/traffic at the schools is so unsafe and there are zero consequences. People double and triple park in the street and police will

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literally drive  
right past as if it's totally fine. Parents don't even flinch when the cops come  
through because they  
know nothings going to happen.  
139 Maintaining landscaping of vacant city property.  
140 I look at neighboring cities in every direction and I see better food and grocery  
options than what  
our town offers. So many of us commute to higher paying jobs but have to commute  
to find places  
to spend our money as well.  
141 Work with Metrolink to provide more trains available for our area without a  
train transfer in  
downtown riverside. Provide cell towers for train riders.  
142 Please make more bike trails... I live off Ironwood so it's very steep. I would  
love a nice bike trail  
with safe car parking since I'd likely have to drive there.  
143 Investing in programs that assist our children at risk. Organized sports can be  
very expensive. The  
rec center is too far for kids on the east side of Pettis Blvd.  
144 Our safety. And not allowing section 8 into our city.  
145 No more warehouses and logistic centers. Council members drive through their  
communities and  
embrace them as if they lived there. Keep the city and residential areas CLEAN  
AND MANICURED.  
Focus on making the MV Mall more attractive to MV families. Keep the city safe  
146 Would really be nice to have a roller rink or ice skating rink. More community  
activities that are kid  
friendly. More police presence and taking care of the homeless issue. No one wants  
to shop when  
the homeless are in the shopping centers.  
147 Regarding the growth of distribution centers, unfortunately they bring fewer  
jobs per square foot of  
space and mor traffic. we need different industries for jobs.  
148 Please represent the people and not the big business that line your pockets.  
Please listen to our  
pleas  
149 Lack of restaurants on the East side of town  
150 I really enjoy the air shows at March Air Reserve Base!  
Our mayor has been doing a great job.  
151 Single family/single person living!!!!  
152 Moreno Valley has all of these distribution centers coming up with low paying  
job, unfortunately  
people are still going to be living in poverty. We need some nice restaurants and

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shopping so I do  
not have to drive to Rancho Cucamonga, or Southcoast. Model the city after Orange County.

153 Don't ruin the positive opportunities by increasing warehousing! Look at all warehousing cities, they are not desirable places to live!  
Don't Change zoning to increase housing - leave the original plan alone and instead improve the housing already available.

154 WE WANT TO TAKE BACK SUNNYMEAD BLVD. from the homeless. Shut down the drug and homeless hotels, run them off private property. They need to have respect just as much as we have respect for others. Leaving the homeless on the streets of Moreno Valley is ENABLING a lifestyle that is dangerous to them and to law abiding, working people.  
FIX THE HOMELESS PROBLEM. There has to be lawyers and city staffing that can outsmart stupid laws that have us all frozen in our tracks. Let's rise up and get smart and move past these laws and do what is best for Moreno Valley as a whole.  
You can not let the few ruin life for the whole. It never works, not in a home, not in a school, not in a community.

155 Hospitals and professional buildings. Retirement homes and elder care facilities  
156 Homelessness. Many just can't afford these massive homes and apartments with a million amenities. You can expect a 19 year old out on their own to be able to afford a 1 bedroom for 1000 a month!! My first place in PA was a studio apartment. Bathroom and rest was open concept, small kitchen and refrig, living room, decent divided area for bedroom. It was above business, we parked below the business. It was basically like a large hotel, with each floor having access by elevator and stairs. Trash chute and laundry room are shared by tenants on that floor. Senior memory care facilities and senior memory care daytime care like a kindercare, where working care givers can safely leave an Alzheimer patient during work hours or when needing to run errands etc

157 Most important thing is our environment.  
158 We need to plant more trees to help clean our air and cool down our city.

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Making Moreno Valley  
green and beautiful should be our top priority!  
159 Expedite development in every way possible with less fees and restrictions  
160 There has been a well balanced mix of housing and commercial development in  
Moreno Valley;  
therefore, now, it is essential that the children that call Moreno Valley home be  
provided additional  
opportunities to use their time in positive constructive environments through out the  
city. Moreno  
valley needs more parks-soccer fields, running tracks, Boys n Girls Clubs,  
YMCA...etc.  
Currently most activities are heavily concentrated in the western portion of the city,  
yet, open  
spaces and growing developments are occurring on the eastern sections of the city.  
Raising healthy  
children requires a city that places children at the top of every decision. Ket's be  
that city.  
161 2040 and beyond may only be a dream now and it may take years but it's  
everyone's effort.  
162 Cap political contributions to any one candidate from any one contributor to no  
more than \$1,000.  
163 keep improving image.  
164 Moreno Valley is a beautiful city and would capitalize on the landscape that we  
are surrounded by.  
165 Crime prevention  
166 Landscaping around sidewalk look super dry. Moreno Valley needs more trees,  
more green plants.  
167 Hire more police  
Get rid of the homeless  
168 More entertainment venues on east side of the city, such as a movie theatre,  
restaurants. 92555 zip  
code.  
169 No more warehouses and no more semi trucks PLEASE!  
170 The crime in the area; porch pirates, mail theft, car and property thefts, violence  
of all types from  
children in school to gang and adults with weapons. Our crime rate is, Nationally,  
pretty high. We  
moved here about 23 years ago and it seems to have become increased over the  
years. There are  
times we consider relocating but have invested in our home and have family in this  
Moreno Valley  
and Riverside. Also, the license people take for driving dangerously in the city has  
skyrocketed as

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the city has expanded.  
I'd be happy to see more police presence on the streets. We need more police. How are people going to choose Moreno Valley to make their home in if we can't make it safe and appealing for them?  
Thank you for asking for opinions. I hope our opinions matter when making your choices.  
171 Save the northeast rural areas. Houses on large lots  
172 Better police patrol, and bigger police forces.  
173 Build more public schools and upgrade the existing schools. I want Moreno Valley to have our own Police Department. I also want chain shopping centers to have better quality of items.  
174 No more warehouses!!  
Better schools that educate children and not just "push them thru" so they can be prepared for college and get a good job.  
Fix the streets! To many potholes & congestion.  
And more affordable housing, substance abuse programs and job training to solve the homeless problem.  
175 Until you clean up the streets of drugs and homelessness nothing else you do will matter in making this a better home for my family.  
176 It would be nice if some of the older, blighted neighborhoods could be spruced up. Perhaps the city could help with that.  
177 Utilize existing vacant buildings. Restore run down neighborhoods. Create new roadways leading into and out of Moreno Valley.  
178 I have lived in this community, in the same house, since 1987. I have many fond memories to date, and will likely live here for the foreseeable future. I appreciate all the help and time spent by city councils during this time. Keep up the good work!  
179 Please be sure to bring jobs that don't only hire from temp agencies. It is important that they offer "permanent" jobs. They need to REALLY invest in the community that they bring all the traffic and congestion to. They need to hire a diverse work force permanently and less than 30% of available jobs need to pull from temp agencies.  
180 Need more cops patrolling for theft issues.

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181 With issues that are happening right now in this country and around the world, this survey has everything that I thought would greatly benefit the community and the environment. I really hope Moreno Valley becomes one of the upcoming cities that leads to a better future.

182 Fix crime and homelessness

183 Reduce crime, homeless and graffiti around the city.

184 Enforcing speed limits, vehicle regulations and seeing more police cruising areas

185 I like the direction the City is headed. Take it to the next level.

186 Safety, restaurants, clean streets. Once you achieve that you can turn to other added community features such as public art, maybe partner with Kawhi Leonard and build a community rec center on the north side and name it after him.

187 Improve Day street. Nason street is not the place to shop. All major shops are in Day street. Make that a focus point to make people feel happy to live in Moreno Valley.

188 Adopt a sustainability plan to improve livability with specific, measurable, achievable, relevant and time bounded goals.

189 Crime, safety, homeless, more quality restaurants and keep Moreno Valley the open Valley with views. Don't continue down the road of more warehouses.

190 Have a weekly, biweekly or monthly citywide get together on Friday night or Sunday afternoon at the City Center. It could be a potluck with everyone bringing something. You could have local music and play games. Or have a dance lesson, then dance. You could have games where people get to know others. And everyone wears a name tag. Maybe provide transportation, like from the senior center. Ask everyone in the beginning to help clean up after. Have boy or girl scouts help.

191 Expanding businesses that bring increased truck traffic will have a huge impact on the quality of life. Plans for improvements to infrastructure will have to be addressed.

192 Main concerns right now are the crime rate, homeless population, and potholes in the streets.

193 If you bring in Industry and business they come yet they be tax out tax to leave the state . Roads and Law enforcement need be scene more off. Medical and education is a major need in this city, With Arts for youth centers.

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194 None  
195 Northeast area south of the 60 freeway to develop industrial sites as previously planned. Best use of property as Skechers and other warehousing in this area. Less traffic. Truck traffic is not a problem and much less pollution than cars from housing use. Please keep this area industrial.  
196 we need to attract businesses that can endure any economic downturn something every City seeks perhaps a Red Lobster to begin with than other attractions that would lead to more businesses follow Riverside's business model and other similar cities who have been successful  
197 Be more aggressive on policing property crimes.  
198 Moreno Valley needs better schools. Our school system is out of touch with their students. More focus on the student experiences now and less on their future experiences. More exposure and access to trade schools/knowledge and less on pushing college to everyone.  
199 Our children should come first to make sure they have an education and be prepared for all of this.  
200 Safer environment, less crime and vandalism. Being able to go outside in your own backyard and not smell marijuana everywhere around you.  
201 More and more homeless are visible...doing something to have them relocated would be nice.  
Traffic/freeways must be addressed before planning for other projects which will increase this problem  
202 Moreno Valley should prioritize bringing jobs to the city, but not warehouse jobs. With a major university 5-10 minutes away, Moreno Valley has companies that will be employing these recent grads. Better jobs, better incomes and a better city economy.  
203 It would be a shame if our mayor took whatever payola the developers are offering him to put warehouses and other businesses that are detrimental to the well-being of our community in place.  
204 Reduce pollution and heavy traffic by not allowing additional warehousing space development.  
205 do not make us logistics hub of the inland empire, unless it can be done in a way that doesn't affect environment as terribly as the World Logistics center was planned.  
206 We do not want a truck terminal built on the North East Moreno Valley end of town.

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207 Get rid of our current city council do nothings and quit pandering to developers! Our mayor and his cronies are pathetic.

208 Plan for senior retirement affordability please

209 I love living in large lot area of mv

210 warehousing produces too much noise, smog and traffic congestion due to the diesel trucks

211 Community centers such as a high tech Library such as the City of Fontana has

212 Get the homeless off our streets.

213 The city properties look great. The city needs to work on private properties, homes, shopping centers etc. The code enforcement department needs to be one of top priorities after police. A nicer looking city attracts a different type of people.

214 I would like the Northeast to maintain its rural appeal

215 I listened to the City Council Study Session on Feb 11 and NOT ONE Councilmember noted Climate Change or the warming of the planet as something the City's 2040 General Plan should address. We need to be saved from ourselves and EVERY City Plan must recognize this as the gravest problem facing us.

216 bringing down homeless population is an immediate need.

217 Conserve the mix of housing, including rural spaces. Even allowing urban chickens.

218 No more warehouses

219 I think make a total revamp of Sunnymead Blvd, adding businesses of all types of income, getting rid of those motels and adding a light rail system that starts from Perris Blvd down Sunnymead, through the mall, making it an open air mall, and the rail system going down to the Moreno Valley civic center down Ellsworth or to the March Air Metrolink station.

220 The Sketchers warehouse has a great restaurant (itself a destination!). That plus the retail store is an excellent model for what Planning Board could REQUIRE for all future warehouse developments.

A) it would make them more acceptable to residents, B) it would provide some additional and different types of job opportunities, and C) it would provide additional tax income sources. The only downside is that it might limit which companies decide to move in, but we are already so



## LETTER

## RESPONSE

warehouse-heavy that it should not matter if we become much more picky about who moves in.  
Overall it would make the warehouse developments much more acceptable. So, I suggest that all new developments be limited to ones where the company with the warehouse includes their own (or a related type) of retail store and there should be a standalone restaurant pad which the company either directly operates or leases to a local entity. The company should have a significant stake in the restaurant as it's quality becomes an important feature of their operation so they take pride in it.  
221 Democrats need to open their eyes and see that they don't have a real plan. Climate change can't be fixed with taxes. We are in a pole shift look at the FAA compass heading changes on all runways. Pole shifts are not fixed by taxes.  
222 Street repair should be top priority. I am not only embarrassed by the condition of our streets but also angry that some areas of this town are totally neglected like the east side passed Lasalle. It will not be long before Edo's fleet of semi trucks over run the best side and destroy what few good roads we have out here.  
223 Please stop putting up cheap stores (dollar stores, 99cents) lowers the class of people  
224 Leave the North East section of town as 1/2 acre lots with higher end housing. It's a unique feature that most cities don't offer.  
225 I moved here in 1982. Moreno Valley used to be a nice place to live. Now, I'm embarrassed to tell people that I live & work here. The crime level, the poor school scores, the homelessness, the red tape with the building department, it just does not bode well for the future of our city. I plan to move as soon as possible.  
226 Don't do a half ass job of paving roads, Pave the whole thing of Moreno Beach and Ironwood. Widen the road too. There is way more traffic and the city council has not planned the growth of the city well. Widen The Roads if you're going to bring more businesses in.  
227 The homeless situation is out of control. More programs for the teens. Better

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pay for the teachers  
and school bus drivers and all school district staff.  
228 STOP THE BULLYING AT THE SCHOOLS- PROTECT THE KIDS-DON'T  
TOLLERATE IT  
229 Please keep the ratio of homes to public parks the same. I know this city will be  
completely  
transformed in 2040, but I hope we create more parks.  
230 No more warehouses. They are ugly and bring a negative health environment to  
everyone because  
of the extra traffic. They look like giant crematoriums. No more homes need to be  
built here. We  
have enough people in this city. Stop advertising in bad areas to bring more people  
for "affordable  
housing". Develop the community by putting in parks and trails like Norco did.  
Guard our mail  
better. Hire more police because the crime is ridiculous. Nobody feels safe here.  
Make sure you are  
putting out cultural events that bring in all cultures, not just favoring specific ones.  
231 Keeping to the current general plan for the NE end of Moreno Valley is very  
important. It is the  
whole reason we purchased here.  
232 Leave the east end rural  
233 The majority of the outspoken residents living in the Nason/ Ironwood area are  
older people. They  
won't consider and/ or listen to the needs of the younger families. As a mom of 3  
you g children my  
priorities are different. I want sidewalks and light on Ironwood. It's dangerous for  
pedestrians  
walking on Ironwood between Vista de Cerro and Nason. My children should be  
able to walk to  
Valley View HS and not have to fear walking down the street.  
Widening Ironwood Avenue would be a great start, especially now with all the new  
factories in  
town.  
234 Say no to all the warehouse.  
235 Adoption of the American Anti-corruption Act at the local level  
236 No more warehouses with their low paying jobs, high truck and diesel usage.  
This is not the town  
people want to live in.  
237 The city should start explaining things in more descriptive ways and stop being  
deceitful.  
238 Focus on high paying jobs and not low paying warehouse jobs  
239 FOCUS ON TRAFFIC.

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240 Highland Fairfax has bought and paid for the council. I'm leaving and taking my tax dollars with me.

241 Please, no more warehouses and large truck traffic. Slow the expansion of warehouses is you can't find other industry to fill the open space in the city. Eventually other industry will find us and we will need the space then.

242 No permanent warehousing north of the freeway. All residential lots north of the freeway on the north end should be half acre or larger NO townhomes or APARTMENT buildings.

243 Continue to protect the rural areas of the city and to move forward on increasing job opportunities of our community. Spend increased revenue on the education of our residents for greater technology opportunities coming down the pipe.

244 Keep the northeast portion and of the City RURAL. And NO MORE WAREHOUSES!!!

245 I think everyone wants a better Moreno Valley but no one ants to actually put in the work.

246 I don't think the WLC is ever going to be a viable project for the East End of Moreno Valley. Some of us are old enough to remember when economist John Husing touted the East End as the place for housing for the business professional that would be brought in by tech jobs and jobs in the health/medical sector. There are only a handful of people who really support the project in all of Southern California and they do that by ignoring the facts of the placement of the project and the traffic it will bring not only to MoVal, but to the citizens of Riverside, Corona and all places along the Hwy 60 and Hwy 91 corridors. The negative health effects on children of the type of pollution that trucks generate is scientifically, irrefutably established by the USC Children's Health Study. And yet, the City pushes on. Can the city, someone, somewhere, not see and acknowledge how irresponsible it is to have not one but two developers on the Advisory Committee? It is just another example of the type of crude, laughable corruption that has plagued Moreno Valley for more than two decades now.

247 -Get rid of marijuana dispensaries, and any other drug locations

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-Enforce where large trucks can travel  
-Improve the homeless situation  
248 Need more police  
249 We need a Costco or Sam's club on the North/East side.  
250 Increase focus on diversified economic development.  
Increase political and budgetary support for public safety.  
Y'all are doing a good job! I wish y'all a blessed day!  
251 More police officers are needed to reduce response time. More office/hitech jobs are needed and fewer warehouses  
252 Education should always be an important part of a community plan. Our schools should strive to be the best, providing excellent curriculum that equips our children to excel in STEAM education. They should also include trade experiences for those who may not want to attend college. Have programs that allow the student to apprentice with local trade industries to earn education credits towards their diploma.  
253 With the increasing senior population it seems that it would be in the best interest of the community to provide programs, services and activities that will fill that growing need. Instead of residents spending their money outside of our community provide these things here and possibly attract visitors from other areas here.  
254 Provide after school programs for kids & young adults.  
255 I think we need to have housing that would make it easier for young people and seniors to live a better life without breaking their budget so they can afford to some things that they would like to do.  
256 Stop focusing on industrial as the only economic option and if it is the only one, why? We need to grow all areas of economy, especially with the Base nearby. Think of what the community wants - more services and parks, not only a warehouse.  
257 Create more opportunities that help reduce our commute.  
258 Don't raise sales tax.  
259 Please no more warehouses. This is will eventually draw people away from here. There is nothing out here !!!!  
260 Tear down the mall and start over and make it more like the riverside plaza

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261 Create a homeless shelter for the homeless here in Moreno Valley.  
262 Right now is it not a good place to live because there are not enough local businesses and very few community building facilities or spaces  
263 Add JDM Car Dealership and Euro Imported Dealership.  
264 Replace our mayor n city council with individuals that can't be bought in any way.  
265 More police and safety officers. Make us feel safe to play at the park with our children. The drug paraphernalia and trash at our parks is something i do not want to subject my child to. I want to ride our bikes or walk around, but shopping without fearing for our children or my safety alone.  
The street racing on ironwood and various other streets is dangerous and rarely stopped. The red light runners are getting worse and causing accidents. The police need resources and more officers to help our community thrive.  
266 Immediately stop striving to be the logistics capital of the country. Stop pushing developer interests over resident interests.  
267 Immediately cease development of logistics centers!!! Bringing major traffic of trucks and personal vehicles, brings more traffic congestion, poor air and noise quality, degrades the environment, and offers mostly minimum wage positions of which we already have an abundant quantity and appear to be working to qualify as largest logistics city of ote U.S.  
268 Mail theft and theft in general needs to get taken care of with harsher punishment for thieves.  
Happens way too often. I'm tired of it  
269 Help the homeless, reduce crime, get rid of bad reputation, reduce old abandon structures.  
270 Keep our city clean! I love living here. Work more with local school district so that we have more space for soccer practice. The elementary schools are perfect but they do not have lights!  
271 Help the homeless, they are becoming a serious problem. I shop at Moreno Valley Ranch and I see homeless everywhere. I don't feel safe. The warehouses are a problem they are an eye sore.  
272 More residential street lighting improves lowers crime at night.

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How can the DEIR/CAP allow for lands zoned to permit the building of warehousing/logistic centers within 1,000 feet of sensitive receptors like families?

2

The DEIR/CAP Final EIR must analyze the impacts of city designated truck routes on sensitive sources and recommend changes with less impacts. Heacock Street is a designated truck route and is adjacent to at least three public schools and their playgrounds. The city's truck routes also pass family homes which are impacted by diesel particulate pollution. The General Plan Update (GPU) Final EIR must show how these routes can be changed and still allow trucks access to our nearby freeway system without impacting as many families in their homes and children at their schools. This analysis must include the walking paths to and from school.

The eighth bullet found at the top reads "lack of a town center with good shopping, dining, and entertainment" is something many people have indicated they do not like about Moreno Valley. Having such should not be at the expense of the health of those who work there and are patrons or live nearby. The proposal for commercial north of SR 60 between Moreno Beach and Theodore will negatively impact the families who live in the 125 homes known at Sterling Ranch (SR).

3

How will Sterling Ranch (SR) residents be protected from the light and noise pollution as well as litter from the proposed land uses? How will SR residents be impacted by users of the Highway Office/Commercial areas? How will SR residents be protected from such intrusions? What uses will commercial zoning allow beyond the current office zoning and what analysis has been done to show those uses impacts on nearby family homes?

Will SR families be protected from the any traffic from these proposed land uses under the GPU? if so, then how? If not, how will the traffic impact the SR residents? What traffic studies have been done to justify your answer?

Council member Thornton expressed during a council meeting on the GPU that she was very concerned about the impacts of the proposed Highway Office/Commercial on the families of Sterling Ranch and requested a plan/mitigations to protect the residents, but nothing was changed.

4

This highlights the critical need for all of Council member Thornton's district to be represented during the GPU/EIR/CAP public hearings and vote. One fourth of the residents of Moreno Valley are without representation and the Sterling Ranch as well as the 10units/acre are just a few reasons that highlight this need. There needs to be a delay in the fast tracking of this process to allow all residents to be represented in the process.

Besides the Freeway Office/Commercial impacting the SR residents, land up zoned

5

2 The comment raises a concern about warehousing near sensitive receptors and diesel particulate emissions near uses such as schools and residences but does not raise a specific concern about the content or adequacy of the Draft EIR, therefore a specific response cannot not provided. Impacts to health related to air quality are addressed in the Air Quality section of the EIR, Section 4.3.5.3. The ultimate land use plan is at the discretion of decision makers and is not dictated by the EIR analysis.

The General Plan includes policy EJ.1-9, to "Designate truck routes that avoid sensitive land uses, where feasible." Regarding truck routes, the draft General Plan Circulation Element states, "Truck traffic on City streets is restricted to specific routes that are designated for thru traffic of trucks over three tons; the truck network system is identified in the City's Municipal Code. These truck routes help to facilitate the movement of goods throughout the city, while providing a connection between major highway facilities (i.e., SR-60 and I-215) to local roadways, such as Alessandro Boulevard and Heacock Street." As truck routes are regulated by the Municipal Code, identification of revised truck routes are outside the scope of the Draft EIR. Regarding evaluation of paths to and from school, the EIR is a program EIR that evaluates impacts of the land use plan at a programmatic level. Analysis of specific improvements such as routes to school are not within the scope of the EIR; although the General Plan does identify an overall circulation network including pedestrian routes.

3 The Draft EIR analysis provides a programmatic evaluation of adoption of the land use plan, including proposed changes in the Sterling Ranch area. As detailed throughout the analysis, the Draft EIR evaluates how implementation of General Plan policies will serve to minimize impacts. Additionally, where appropriate, mitigation measures are identified that would be applied during future site specific environmental reviews for specific development proposals. As a general plan EIR, a site specific analysis is not feasible or appropriate. As future projects are proposed, additional site specific

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	<p>3 cont.</p> <p>environmental review would be required to address potential impacts related to noise, lighting, transportation, and consistency with the land use plan, consistent with the framework outlined in the General Plan EIR. Refer to the following Draft EIR Sections for discussion of impacts related to noise (4.13), air quality (4.3), and transportation (4.16). All technical analysis completed to support the Draft EIR are included as EIR appendices. This comment does not suggest an inadequacy in the analysis of the Draft EIR.</p> <p>4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.</p> <p>5 Draft EIR Section 4.17.5 discusses the need to install improvements to sewer facilities to serve the proposed land use plan and therefore does disclose potential impacts associated with installation of utility infrastructure. This section was additionally clarified to identify the need to extend sewer lines north of SR-60 to serve future development. Future sewer line or other utility improvements would be analyzed at the project level associated with a future development application. Additionally, the Final EIR Section 5.3.2 was revised to clarify the need for sewer improvements and extensions to accommodate the land use plan.</p>
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to 10 units/acre was added not too far away. These lands have no sidewalks or bike lanes or public transportation anywhere nearby. How does the GPU/DEIR justify this high density in an area without the infra structure support that it residents very likely will require?

Since these lands zoned at the 10/acre will require a sewer system, where are the studies in the DEIR that analyzes the growth inducing impact of such changes in an area that currently uses only septic tanks? The Final EIR will be inadequate without growth inducing, direct, indirect, cumulative impact analysis on all lands which which are north of SR-60 and east of Nason Street caused by bringing sewers into this area.

Larger lots allow our City to have a variety of housing stock. The City once hired John Housing to look at our housing stock and he urged us to maintain large lots to attract and keep business owners in our town. This was very important to provide our residents a variety of job opportunities which is a need stated again and again in the survey. The Final EIR needs to show the importance of having a variety of housing and how NE Moreno Valley is the best place left for larger lots.

How can the City zone lands in excess of five units per acre and especially at 10 acres or greater without the necessary infrastructure to support the residents? Multi-family units need sidewalks, bike paths, public transportation, stores and ideally job opportunities. The Final EIR must show the public and decision makers which lands zoned for multi-family units are connected to sidewalks, bike paths, public transportation and stores within walking distance as well as which lands of those lands do not have those infra-structure in very close proximity. The Final EIR must analyze the impacts on residents in multi-family units — especially low income — who will be in units without adjacent sidewalks leading to nearby stores as well bike paths and public transportation. Environmental justice demands nothing less for many who will live in these units.

Survey responses also mentioned the importance of open space. Last year I sent you three correct maps of the San Jacinto Wildlife Area (SJWA). Those maps of the SJWA's boundaries are needed in these documents and the Final documents must be accurate or decision makers' votes will not be valid.

The air quality analysis found in the documents doesn't meet the standards of the South Coast Air Quality Management District (SCAQMD) and must be redone...especially in the large area of our City officially designated Disadvantaged by the state. This analysis must model air quality expected in these areas from projects approved, but not built or they will be inadequate.

Please keep me informed of all future documents and meetings related to these

5  
Cont.

6

7

8

9

6 The City acknowledges that new development will necessitate improvements such as sidewalks and bike paths. As future site-specific development projects are proposed consistent with the General Plan land uses, a site specific environmental analysis will be completed that will include evaluation of project consistency with applicable General Plan policies related to pedestrian and bicycle circulation and infrastructure needs. Necessary infrastructure improvements would be determined as part of future site specific development reviews and project conditions of approval would require implementation of necessary infrastructure improvements.

7 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The Biological Resources section of the Draft EIR (Figure 4.4-5) depicts the San Jacinto Wildlife Area.

8 The air quality analysis in the EIR modeled air emissions for both construction and operational emissions based on build out of the General Plan. The comment does not raise a specific issue regarding the air quality modeling that was completed; therefore, a more specific response cannot be provided.

9 Concluding comment noted.



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documents.

Sincerely,

George Hague



8  
Cont.

Letter I-15

**From:** [George Hague](#)  
**To:** [Chris Ormsby](#)  
**Subject:** Comments on Moreno Valley's GPU/CAP/DEIR & AG's letter on warehousing  
**Date:** Monday, May 17, 2021 3:35:23 PM  
**Attachments:** Screen Shot 2020-05-28 at 4.21.37 PM.png  
 Untitled attachment 00530.htm  
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 Untitled attachment 00614.htm

Good afternoon Mr Ormsby,

RE: III Moreno Valley's General Plan Update (GPU), Draft EIR and Climate Action Plan (CAP).

Earlier this year the State Attorney General's (AG) office released the letter found at the bottom of this email concerning warehousing impacts on communities and what cities must do

1

1 Comment noted. The comment introduces and cites sections of a document a from the State Attorney General's office.

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to reduce their impacts. A portion of the letter is on the General Plan process and what Cities need to include and that is what I share when using quote marks.

1  
Cont.

"To systematically address warehouse development, we encourage governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and guide sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide."

The above paragraph from the AG's letter points out the importance of specifically zoning lands so the public knows where warehousing/logistic centers are permitted. The City must change the proposed flexible zoning to exclude warehousing as a possible use to realize the benefits listed in the last sentence. The way the city granted approval of the warehousing within the Festival project — along Ironwood Ave and east of Heacock Street — is a prime example of impacting nearby family homes without even a public hearing because of the "flexibility" of permitted land uses.

2

2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

"Proactive planning can take any number of forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors can help avoid conflicts between warehouse facilities and residential communities."

The Moreno Valley Trade Center warehouse currently under environmental review is in direct conflict the AG's paragraph found above. This project would replace existing land zoned for family homes with a very large warehouse which would then be across the street from an existing neighborhood of homes. The General Plan must restrict such conflicts and General Plan Amendments must not be allowed which would allow such negative impacts on the health of Moreno Valley residents.

3

3 Comment noted. The comment is referencing a project that is outside of the scope of the General Plan update. A project inconsistent with the General Plan land use plan would not be covered by the Draft EIR and would be subject to a separate site specific analysis including any proposed land use changes.

"In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities."<sup>12</sup>

4

4 The General Plan has incorporated an Environmental Justice Element [www.moval.org/cdd/documents/general-plan-update/draft-docs/GP-Elements/08.pdf](http://www.moval.org/cdd/documents/general-plan-update/draft-docs/GP-Elements/08.pdf). Future development would be subject to applicable policies of the Environmental Justice Element. Additionally, information about the plan and environmental document have been provided in Spanish at [MV CDD: 2040 General Plan Update \(moval.org\)](http://MV CDD: 2040 General Plan Update (moval.org))

A large portion of Moreno Valley south of SR-60 has been designated by the state as a Disadvantaged Community (DC) as seen in the map found below. This also happens to be where most of the warehousing has been approved. The General Plan Update (GPU), Draft EIR (DEIR), and Climate Action Plan (CAP) fails to reduce the health risks to the DC. The fact that the documents are not in Spanish also fails to "promote civil engagement in the public decision making process" also shows the City is not taking seriously the obligation of SB 1000 — especially in our City with a high percentage of Latinos and speakers of Spanish.

"The Bureau is aware of four good neighbor policies in California: Riverside County, the City of Riverside, the City of Moreno Valley, and the Western Riverside Council of Governments.<sup>13</sup> These policies provide minimum standards that all warehouses in the jurisdiction must meet. For example, the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors, and it requires a number of design features to reduce truck impacts on nearby sensitive receptors. The Riverside County policy requires vehicles entering sites during both construction and operation to meet certain California Air Resources Board (CARB) guidelines, and it requires community benefits agreements and supplemental funding contributions toward additional pollution offsets."

"The Bureau encourages jurisdictions to adopt their own local ordinances and/or good neighbor policies that combine the most robust policies from those models with measures discussed in the remainder of this document."

5

The City must have a much stronger Good Neighbor policy. Only then we might prevent so many General Plan Amendments which put warehousing across the street from family homes. This needs to be incorporated into the GPU/CAP. While we have what some consider a good neighbor policy, it isn't being honored and must be strengthened. In the last four years at least four warehousing projects have been approved which are directly across the street from family homes with most allowing the street to be used by their diesel trucks. Our City's Good Neighbor Policy must be made much better to protect our entire City, but especially our Disadvantaged Community. The last sentence above mentions the need to have "robust policies from those models with measures discussed in the remainder of this document." Those are found below and must be incorporated into our City's Good Neighbor Policy to better protect our Disadvantaged Community.

The GPU/DEIR/CAP also fail to address what are considered the three pillars of Health in All Policies (HIAP) as seen below in order to better serve and protect the Disadvantaged Community and to limit its possible expansion.

THE THREE PILLARS OF HIAP

**EQUITY:** Equity is just and fair inclusion into a society in which all can participate, prosper, and There is a distinction worth describing between equity and equality. Equality is about providing the same to all regardless of need or circumstance, but this only works if everyone is starting from the same place. Equity is about fairness, making sure people have access to the same opportunities. Inequities are unfair, avoidable, and unjust differences that are created when systemic barriers prevent individuals and communities from reaching their full potential.

6

**PUBLIC HEALTH:** Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity. Health is also a fundamental component of quality of life. A healthy population is a critical building block for a sustainable and thriving economy.

**SUSTAINABILITY:** Creating and maintaining conditions so that humans can fulfill social, economic, and other requirements of the present without compromising the ability of future

5 Comment noted. The GPU does include a number of policies specifically aimed at increasing compatibility between land uses. For example, General Plan policies EJ.1-D states, "Work with the distribution and warehousing business community to improve outdoor air quality through improved operations and practices, such as planning for zero emissions trucks and vans. The GPU policies would be applied as future site specific development proposals come forward.

6 As stated above, the GPU includes an Environmental Justice Element that incorporates a number of health focused policies. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

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generations to meet their own needs . This can be thought of in terms of environmental, economic, and social impacts, and encompasses the concept of stewardship and the responsible management of resources.

Moreno Valley's failure to incorporate this into the documents under review further shows their failure to address Environmental Justice and meet the needs of our Disadvantaged Community. Other Cities like Santa Cruz has already implemented IIIAP.

Diesel pollution and its related impacts must be part of the health element the City is proposing for the General Plan Update (GPU) and as part of the Climate Action Plan (CAP) or it will be inadequate. The California Air Resources Board (CARB) believes siting warehouse facilities at least 1,000 feet from the nearest sensitive receptors must be a requirement by decision makers to protect families. Moreno Valley GPU health element must include this or our final health element will be inadequate and jeopardize the health of many residents.

Please keep me updated on all meetings and documents.

Sincerely,

George Hague

6  
Cont.

7

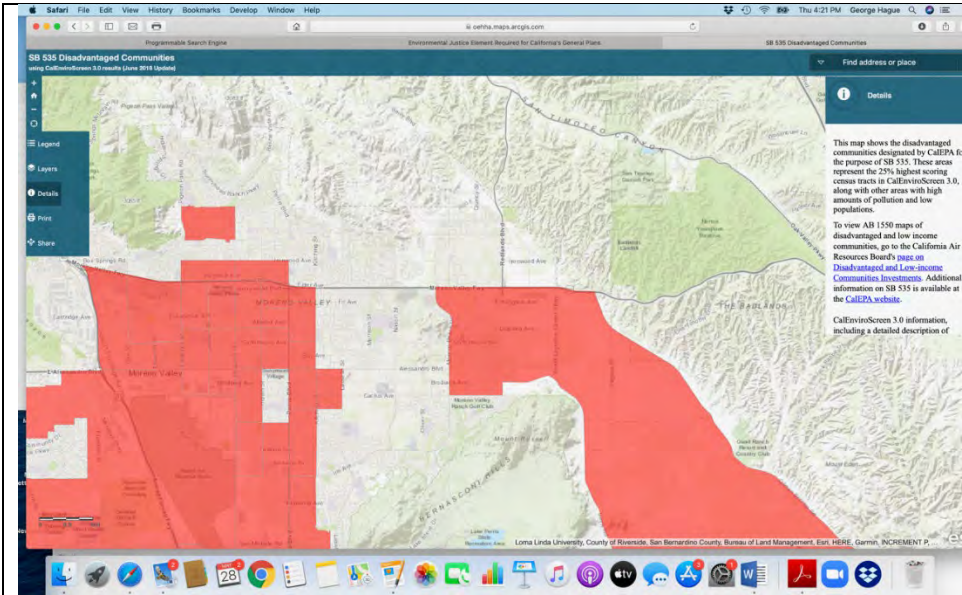
8

7 Impacts associated with stationary sources, diesel particulate matter, and sensitive receptors are addressed in Section 4.3.5.3(b) of the EIR. Emissions of toxic air contaminants (TACs) would be regulated by SCAQMD through permitting and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under SCAQMD Rule 1401. Further, the City's process for evaluation of future development that could be implemented would also include environmental review and documentation pursuant to CEQA, as well as an analysis of those site-specific projects for consistency with the goals, policies, and recommendations of the 2021 GPU, which would include an analysis of impacts to sensitive receptors. Additional measures that can be implemented at the project level have been added to the FEIR in order to facilitate future site design at warehouse and distribution center sites to reduce impacts to sensitive receptors. As concluded in the EIR, adherence with regulatory framework would ensure that future development would not expose sensitive receptors to TACs associated with stationary sources within the Planning Area, and impacts would be less than significant.

8 Concluding comment noted.

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Letter I-16

From: George Hague  
 To: Chris Ormsby  
 Subject: Comments on General Plan/CAP/DEIR...#2 Community Survey for Moreno Valley GPU and CAP  
 Date: Monday, May 17, 2021 1:28:10 PM

Good afternoon Mr Ormsby,

RE: II Moreno Valley's General Plan Update (GPU), Draft EIR and Climate Action Plan (CAP)

Beginning with Table 3-2 found below you will read much of what was listed in Community Survey #2 which was titled Future Growth Concepts Survey Report. More than 70 open ended responses were added to Community Survey #1 which "received a total of 597 responses." Why weren't these two survey results widely shared with the public—especially the second survey?

Most of the information found below comes from that buried survey titled Future Growth Concepts Survey Report along with some questions which follow that require your response:

**Table 3-2  
 Concept Ranked as Top Priority for Future Growth**

Concept	Count	Percent
Downtown Center	51	42.9%
Community Center Mixed Use - Moreno Valley Mall	22	18.5%
Community Corridors	7-12	5.9%-10.1%
Freeway Commercial/Office	8	6.7%
Business Flex	5	4.2%
Residential Density Changes	4	3.4%
Community Corridors - Perris Boulevard	3	2.5%
Total Respondents	119	100.0%

The six common themes are identified and summarized below. Some sample quotes from respondents are included as illustration and edited for clarity. "Other Responses" is a collection of diverse comments from which there is no discernable common theme. Refer to Appendix B for complete open-ended responses.

- **Support for a downtown area and revitalizing existing commercial centers and corridors**
- "Create a central destination area with recreational, dining, and entertainment opportunities."
- "Victoria Gardens is a good example to follow—open air concept with outdoor eateries, higher quality stores, and classy restaurants."
- "Develop a sense of community and inclusiveness through a downtown that brings people together."
- "The Downtown Area would allow local Moreno Valley residents and residents of neighboring communities to enjoy and digress from the daily stresses of life providing quality pastimes."
- "I like the Downtown Concept because it takes advantage of the booming healthcare industry and increases walkability to services for surrounding neighborhoods."
- "Improve the existing commercial centers, especially the Moreno Valley Mall—improve what's already there."
- "Make the Moreno Valley Mall, Sunnymead Boulevard, and

1 The comment restates information from community surveys. All public outreach events, materials and survey information has been made available to the public on the City's website for the General Plan Update <http://www.moval.org/cdd/documents/general-plan-home.html>.

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Alessandro Boulevard attractive gateways to the city for freeway travelers.”

<!--[if !supportLists]>>• <!--[endif]>>“Improve the existing commercial corridors of Sunnymead, Alessandro and Perris. Revitalized corridors can offer more jobs for residents and convenience of location for services and products.”

<!--[if !supportLists]>>• <!--[endif]>>“Sunnymead Boulevard is the current downtown and needs to be redeveloped, consider giving it a theme to be more attractive as a destination (e.g. Little Tokyo in Los Angeles). Other inspirations to draw from include Downtown Monrovia, Redlands State Street, and La Crescenta-Montrose.”

<!--[if !supportLists]>>• <!--[endif]>>“Perris Boulevard can benefit from improved Code Enforcement for dilapidated apartments.”

<!--[if !supportLists]>>• <!--[endif]>>“The Moreno Valley Mall could be renovated into office space, including with medical office.”

<!--[if !supportLists]>>• <!--[endif]>>“The District area needs to be revitalized but this is challenging given new warehouse developments surrounding.”

<!--[if !supportLists]>>• <!--[endif]>>“Be conscientious of new development outside of existing commercial areas that can compete with existing businesses.”

<!--[if !supportLists]>>• <!--[endif]>>“The City should look at promoting incentives and exploring partnerships (e.g. federal, state, UC Riverside) to bring in necessary funds to redevelop property.”

<!--[if !supportLists]>>2. <!--[endif]>>**Restrict new warehousing/logistics uses**

<!--[if !supportLists]>>• <!--[endif]>>“The city does not need more warehouse development.”

<!--[if !supportLists]>>• <!--[endif]>>“Warehousing/logistics uses contribute to pollution and congestion in the city, especially truck traffic.”

<!--[if !supportLists]>>• <!--[endif]>>“The Interstate 215 corridor is set up for warehouses already; industrial uses should congregate around the March Air Reserve Base and Interstate 215.”

<!--[if !supportLists]>>• <!--[endif]>>“Warehouse siting in proximity to residential uses should not be allowed.”

<!--[if !supportLists]>>• <!--[endif]>>“Maintain the northeastern portion of the city above State Route 60 as a rural atmosphere that complements equestrian and agricultural activities.”

<!--[if !supportLists]>>• <!--[endif]>>“Maintain low density zoning and larger parcels (e.g. R1 and R2) in the northeastern portion of the city and higher density uses in other established areas of the city.”

<!--[if !supportLists]>>• <!--[endif]>>“The World Logistics Center project should not proceed.”

<!--[if !supportLists]>>3. <!--[endif]>>**Focus efforts on citywide cleanliness and beautification and reducing crime**

<!--[if !supportLists]>>• <!--[endif]>>“Please make city maintenance a focus to help our residents maintain pride of our community.”

<!--[if !supportLists]>>• <!--[endif]>>“Clean up the streets and buildings, including aging housing stock and abandoned businesses— litter are weeds are problematic.”

<!--[if !supportLists]>>• <!--[endif]>>“Improve/repair existing road conditions (i.e. potholes).”

<!--[if !supportLists]>>• <!--[endif]>>“Redevelop blighted corridors in older parts of the city such as Sunnymead Boulevard, Alessandro Boulevard, and Edgemont—help tenants maintain their properties.”

<!--[if !supportLists]>>• <!--[endif]>>“Improve Sunnymead Boulevard through addressing poor landscaping, homeless encampments, and drug activity.”

<!--[if !supportLists]>>• <!--[endif]>>“Curb appeal is important. Creating a vibrant area that catches the eye of those driving by, as well as easy access to desirable eateries, attractions, and work places, would be a big plus for our city.” “Promote community projects such as murals, displays, and other activities that highlight Moreno Valley’s history.”

“Look at models of redevelopment for downtown Riverside and Temecula.”

<!--[if !supportLists]>>• <!--[endif]>>“Increase landscaped medians.”

<!--[if !supportLists]>>• <!--[endif]>>“In view of increasing robberies, new development, especially housing, should incorporate crime prevention designs.”

<!--[if !supportLists]>>• <!--[endif]>>“Enhance safe shopping experiences with less vacant/unused storefronts.”

<!--[if !supportLists]>>• <!--[endif]>>“There are just many areas in the city where I see empty plazas and failed businesses which make the city appear depressed. There needs to be a renovation in the city and a



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revival in creating businesses that will meet the community's needs in regard to product, which will in turn create and sustain employment for residents."

<!--[if !supportLists]--> <!--[endif]-->"Future industrial buildings, such as distribution centers, should have color palettes similar to the building owned by Aldi that are earth and natural tones which blend into the landscape."

<!--[if !supportLists]-->4. <!--[endif]-->**Provide a variety of housing opportunities for current and future residents**

<!--[if !supportLists]--> <!--[endif]-->"Provide housing types at different price ranges suited to a variety of lifestyles (e.g. young singles, young families, executives, etc.)."

<!--[if !supportLists]--> <!--[endif]-->"Provide housing types that range from higher density and more affordable smaller homes on smaller lots to more expensive and larger homes on larger lots (half acre and larger)."

<!--[if !supportLists]--> <!--[endif]-->"Maintain the larger homes on larger lots in the northeastern portion of the city above State Route 60."

<!--[if !supportLists]--> <!--[endif]-->"Develop higher-end housing particularly in the east end (i.e. large homes on large lots). Upper end housing should include ranch style homes and single-story homes."

<!--[if !supportLists]--> <!--[endif]-->"The areas of the World Logistics Center and Aquabella are suited for higher density housing and more businesses as these locations are near the city center."

<!--[if !supportLists]--> <!--[endif]-->"Plan for housing for seniors (age-in-place, single-story homes)—possibly in the Downtown Center so that seniors are near the hospitals and commercial and entertainment options. Ensure availability of housing options to citizens at all stages of life."

<!--[if !supportLists]--> <!--[endif]-->"Higher density housing is good but needs to be located near transit centers, shopping, sidewalks, bike paths, and bus stops."

<!--[if !supportLists]--> <!--[endif]-->"Locate affordable homes in the downtown close to transit."

<!--[if !supportLists]-->5. <!--[endif]-->**Provide additional community-oriented services/facilities**

<!--[if !supportLists]--> <!--[endif]-->"Add a civic center."

<!--[if !supportLists]--> <!--[endif]-->"Add a senior center."

<!--[if !supportLists]--> <!--[endif]-->"Add recreational parklands and services. Spread out facilities that are suitable for all ages."

<!--[if !supportLists]--> <!--[endif]-->"Good schools, libraries, and parks are key."

<!--[if !supportLists]--> <!--[endif]-->"A large library is needed (e.g. City of Fontana)—look at having computer labs and other amenities such as free public WiFi to keep up with technological advancements and to engage the youth."

<!--[if !supportLists]--> <!--[endif]-->"New communities should come with new schools."

<!--[if !supportLists]--> <!--[endif]-->"The city needs a sports complex, including an aquatic center and public pools."

<!--[if !supportLists]--> <!--[endif]-->"Improve the multi-use trail and connections to Lake Perris."

<!--[if !supportLists]--> <!--[endif]-->"Improve bike and horse trails connecting the hills of the city."

<!--[if !supportLists]--> <!--[endif]-->"Have a large, grand park "major attraction" to compete with others in the region."

<!--[if !supportLists]--> <!--[endif]-->"There is a lack of parks north of State Route 60 even though there are schools and newer housing."

<!--[if !supportLists]--> <!--[endif]-->"Provide more services for youths such as youth centers (e.g. YMCA, Boys & Girls Club) and recreational centers on opposite sides of the city—improve quality of life and focus on children." "Provide lighted parks and fields for recreational activity—school-lighted fields are available but the process to obtain facility use permission has become more extensive and expensive."

"The city's new amphitheater is a good place to focus other community-drawing shopping and entertainment destination uses." Note, one respondent suggested an alternative location for the amphitheater to a more centralized location (e.g. Lasselle Park or Morrison Park).

<!--[if !supportLists]--> <!--[endif]-->"Consider a water park as an attraction for the city given the hot climate (suggested location: vacant land between Theodore Street and Redlands Boulevard)." Note, two respondents mentioned a water park use with emphasis on creating a family-friendly entertainment venue and opportunities for youth recreation.

<!--[if !supportLists]--> <!--[endif]-->"A performing arts center in the downtown has the potential to

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create a destination in the city.”

<!--[if !supportLists]>> <!--[endif]>>“Have more City-sponsored events that enhance and celebrate community pride and heritage.”

<!--[if !supportLists]>>6.<!--[endif]>>**Increase diversified job opportunities for local residents**

<!--[if !supportLists]>> <!--[endif]>>“Warehousing/logistics jobs are low paying; focus on higher paying, higher skilled jobs for local residents (e.g. medical industry).”

<!--[if !supportLists]>> <!--[endif]>>“Become a destination city that attracts young professionals and creative individuals.”

<!--[if !supportLists]>> <!--[endif]>>“Adaptively reuse empty warehouses, storefronts, etc. with a focus on attracting businesses that brings jobs for local residents. There are a lot of empty buildings and it is illogical to build more.”

<!--[if !supportLists]>> <!--[endif]>>“Moreno Valley has a history of over reliance on sectors such as housing, construction, retail, logistics, and service industries to provide local employment. Changing the diversity can support a more positive development future for the community.”

### Other Responses

<!--[if !supportLists]>> <!--[endif]>>“Increase public outreach and involvement, particularly the youth, for the General Plan Update.”

<!--[if !supportLists]>> <!--[endif]>>“Plan for climate change.”

<!--[if !supportLists]>> <!--[endif]>>“The city has enough homes and apartment complexes.”

<!--[if !supportLists]>> <!--[endif]>>“No low-income housing or new apartments, townhomes maybe. There are enough people here already and we don’t need to encourage more people to move in.”

<!--[if !supportLists]>> <!--[endif]>>“No more tiny homes.”

<!--[if !supportLists]>> <!--[endif]>>“No denser housing—make single-family homes more affordable by having more built.”

<!--[if !supportLists]>> <!--[endif]>>“Do not mix shopping and housing areas.”

<!--[if !supportLists]>> <!--[endif]>>“Have buffer areas between existing houses and small, commercially zoned areas and warehousing.”

<!--[if !supportLists]>> <!--[endif]>>“The Freeway Office/Commercial concept area is too removed from the rest of city and any new commercial would compete with the new downtown and existing commercial areas.”

<!--[if !supportLists]>> <!--[endif]>>“No commercial use in northeast portion of the city.” Note, the respondent expressed concern that commercial designation will not result in high quality attractions but rather result in undesirable gas stations, truck stops, etc.

<!--[if !supportLists]>> <!--[endif]>>Three respondents noted support for office and commercial use in the area north of State Route 60.

<!--[if !supportLists]>> <!--[endif]>>One respondent would like to see greater density at the northeastern end of town (Theodore/Ironwood) but said strip commercial is not relevant. Another respondent noted support for more restaurants on the east side of town and better shopping choices.

<!--[if !supportLists]>> <!--[endif]>>“There should be no building on the city’s hillsides as they are scenic and character defining.”

<!--[if !supportLists]>> <!--[endif]>>“Capitalize on the scenic views the city has to offer. Do not obstruct/degrade views.”

<!--[if !supportLists]>> <!--[endif]>>Three respondents noted that Hemlock Avenue should not be extended. There is concern for traffic congestion, the street becoming a truck route, and speeding cars that will negatively affect surrounding residential neighborhoods.

<!--[if !supportLists]>> <!--[endif]>>“The term corporate campus should be clarified. Is this a standard office park?”

<!--[if !supportLists]>> <!--[endif]>>“The Business Flex area is in dire need of redevelopment and City should aid.”

“Have a sidewalk on Ironwood Avenue between Vista de Cerros and Redlands Boulevard.”

<!--[if !supportLists]>> <!--[endif]>>“We do not want pot shops.”

<!--[if !supportLists]>> <!--[endif]>>“No more sports fields, we have enough of these.”

<!--[if !supportLists]>> <!--[endif]>>“Build a professional dramatic arts theater, not an outdoor theater.”

<!--[if !supportLists]--> <!--[endif]-->"Make Ironwood a two-way lane in each direction between Perris Boulevard and Redlands Boulevard."  
 "Focus on development that makes citizens more apt to spend their time and money"

Q3 Tell us about your Preferred Plan for 2040 or share your thoughts on the Draft Concepts.

Answered: 78 Skipped: 49

#	RESPONSES	DATE
1	No more warehousing. Keep NE MoVal R1 and R2 animal keeping/agriculture.	5/21/2020 8:59 AM
2	Having lived here for thirty years this city refuses to think for itself OR follow the last General plan well. With the current mayor I don't see much hope in ignoring outside influences. We need to stop selling out to anyone outside of our city, we need to invest in what we have. Rebuild our city with a civic center or maybe two that serve our community. NO to more tiny homes, NO to paving over land with warehouses. Develop recreational parks and services that we use. Good planning needs to be supported and followed. Be green. Be aware of Climate Change. Involve our youth.	5/21/2020 3:12 AM
3	I am opposed to any and all zone changes North of the 60 freeway between Vista de Cerros and Theodore St. Moreno Valley needs to continue keeping and protecting the last remaining rural areas of our city, most of which are located in the NE and SE areas of our city. Protecting these areas from zone changes will insure that people will always have a choice to live in the rural areas of our city and where we have the lowest crime rates. Beginning with first General Plan, and the following updates to it, Moreno Valley has maintained the low density zoning of mostly R1 and larger parcels in the rural areas of our city. I want these areas to remain safe to protect it's rural nature. The low density R1 or larger minimum zoning should remain in place. All other zoning types should be prohibited North of the 60 Freeway. All other high density zoning, as well as industrial, commercial, warehouses, office space, shopping, gas stations, or anything other zoning types could continue to be kept in the South and Northwest areas of the city. Diversity in zoning gives people the choice of living in the city with all of its congestion, neighborhood traffic, noise pollution, close proximity to convenience shopping, and everything else that comes with living in the city. Or living in the rural less congested areas. High density zoning, as well as industrial, commercial, warehouses, office space, shopping, gas stations, or anything other zoning types could continue to be kept in the South and Northwest areas of the city. In the future I want to see open spaces and large properties are still here. I think living in the city is stifling. Living on a large property you can still feel the breezes, see wildlife, see the night sky, you have less traffic, you have less noise pollution, you have fewer people, don't hear your neighbors, and can enjoy the outdoors. No one should purchase rural R1 or larger zoned properties then try to coerce changes in zoning. Developers should by property zoned to fit their projects, not try to change zoning to fit their project.	5/20/2020 11:38 PM
4	MY has enough homes & apt complexes. A downtown area would be great for the community.	5/20/2020 11:21 PM
5	I hope that the city can help improve the community by revitalizing areas such as our small area, Sunnymead Blvd, Perris Blvd, and Alessandro Blvd. These areas are sad to drive through, seem depressed, and there is nothing that would draw people to our city in these areas let alone our own residents. Perhaps new parks or creating a Victoria Gardens development would be a possibility in these areas. Good planning is key. We need to focus on keeping our city clean as well. Many of our streets are lined with trash and neglected. Are we really considering building new projects in the city and we can't even keep our current streets and developments clean? Please make city maintenance a focus to help our residents maintain pride of our community. We do not need more warehouse development along the 60 freeway or in other parts of the city. We can and should do better for our citizens than low paying, warehouse jobs that will add pollution and congestion to our city. Stop consideration of these development projects, we can improve our city without this blight.	5/20/2020 11:18 PM
6	I like the activities	5/20/2020 9:55 PM
7	No warehouses in the rural north east side. The 215 corridor is already set up for warehouses. No rezoning in northeast.	5/20/2020 9:04 PM
8	I would prefer to see our city diversify the opportunities for local residents and Our kids as they grow up. Please do not set a course for a single industry of logistics and warehousing. We need better economic possibilities so that we can become a destination city that attracts young professionals and creative individuals. I would like to see a city Central area with recreational, dining, and entertainment venues with a diverse combination of small businesses to draw from. These could be microbreweries, light Manufacturing, Computer and online development	5/20/2020 8:55 PM

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entrepreneurs. We should develop housing to fill the needs of everyone. These should include young families just starting out, young singles, move up housing to give opportunities for residents to stay in Moreno Valley as they improve their earning ability. We should not pigeonhole economic levels to any one area. I wouldn't tell you that I have been in Moreno Valley for 33 years now and only chose to stay because I had an opportunity to move to a small section of town that has the type of housing I was looking for. I was ready to move out of the city when I was fortunate enough to find My current home. I do live in the East end of town now and love it. There is plenty of open land to develop similar high-end housing that will allow residents to move up. I moved here originally for the low cost of housing. I raised my young family here and my kids are grown and live and work in Moreno Valley. They are just starting out, but will have to look elsewhere as their careers grow. The opportunities for growth at their level of Education are few. Thank you for the opportunity to express my thoughts.

9	Note Logistic centers!!	5/20/2020 8:39 PM
10	I don't think the World Logistics Center should be allowed	5/20/2020 8:29 PM
11	The world logistics plan needs to not be approved. Will cause more harm to environmental area than good for moreno valley.	5/20/2020 7:45 PM
12	MoVal needs to develop a sense of community and inclusiveness and this is consistent with having a downtown that brings people together. A downtown focus can if done correctly provide a dynamic vibrant community center that attracts people which supports the economy of the City. We have too much disjointed sprawl, too many warehouses that don't provide good paying jobs (automation). We don't need 12000 trucks driving through our neighborhoods.	5/20/2020 7:45 PM
13	NO MORE WAREHOUSES SHOULD BE BUILT IN MORENO VALLEY. THEY ARE UGLY AND WON'T EMPLOY MANY PEOPLE IN THE FUTURE. THE BIG RIG TRUCKS WILL RESULT IN INTOLERABLE TRAFFIC, NOISE AND POLLUTION FOR MANY RESIDENTS. THE WORLD LOGISTICS CENTER IS NOT THE ANSWER TO MORENO VALLEY AND WILL BE AN UGLY STAIN ON MORENO VALLEY. SUNNYMEAD BOULEVARD NEEDS TO BE CLEANED UP AND MADE MUCH MORE ATTRACTIVE. PUT FLOWERS IN THE UGLY ORANGE MEDIANS ON SUNNYMEAD BLVD AND ANYWHERE ELSE IN MEDIANS IN THE CITY. THEY ORIGINALLY SAID IT WAS TOO EXPENSIVE TO PUT FLOWERS IN THE MEDIANS IN MORENO VALLEY!!!! TOO EXPENSIVE FOR FLOWERS IN THE MEDIANS, WHEN THERE IS MONEY TO DO OTHER THINGS LIKE WIDEN MAJOR ROADS TO BENEFIT ONE DEVELOPER???? UPKEEP OF THE EXISTING ROADS IS VERY IMPORTANT. IF THE ROADS HAVE LOTS OF POTHOLES, POOR SURFACING AND WEEDS GROWING OUT OF THEM, IT WON'T MATTER WHAT ELSE YOU BUILD. IT WILL STILL BE AN UGLY CITY. ALL THE BIG RIG TRUCKS ARE GOING TO TAKE A TERRIBLE TOLL ON ROADS, THE BEST USE FOR THE EAST SIDE IS NICE HOMES ON BIG 5 ACRE LOTS. THAT WAS THE ONLY THING THAT REALLY GAVE MORENO VALLEY STATUS. PEOPLE FROM OTHER AREAS FOUND THOSE LARGE RESIDENTIAL HOMES VERY ATTRACTIVE AND THERE IS STILL A BIG DEMAND FOR THOSE HOMES ON 5 OR MORE ACRE LOTS. YOUNG PEOPLE ARE UNLIKELY TO MOVE INTO TOWNHOMES IN MORENO VALLEY OR IF THEY DO, THEY WILL SOON MOVE OUT. THE POPULATION IN MORENO VALLEY IS VERY TRANSIENT. PEOPLE WANT TO LIVE PERMANENTLY IN PRETTY AREAS, WITH GOOD SCHOOLS AND SOLID AMENITIES LIKE VERY NICE LIBRARIES AND PARKS TO RAISE THEIR CHILDREN. THEY ARE UNLIKELY TO STAY IN THE CITY, TO HAVE BIG RIG TRUCKS RUMBLING NOISILY, BELCHING NEXT TO THEM ON THE ROADS AND THE FREEWAY. IF THEY MOVE IN, THEY WILL TRY TO MOVE OUT TO ESCAPE THE BIG RIG TRUCKS AND WAREHOUSES ALL AROUND BLOCKING THE BEAUTIFUL MOUNTAIN VIEWS. COMPLETELY. CITY REPUTATION IS VERY IMPORTANT AND IMPOSSIBLE TO CONTROL BECAUSE PEOPLE WILL HONESTLY APPRAISE THE QUALITY OF LIFE IN MORENO VALLEY, AND LET EVERYONE ELSE KNOW THE TRUTH. THE CITY GOVERNMENT CAN SPIN BIG RIG TRUCKS AND TRAFFIC AND NOISE AND POLLUTION ALL THEY WANT. PEOPLE WILL ALWAYS FIND OUT THE TRUTH. SUCCESS WILL ONLY COME TO MORENO VALLEY IF IT IS AN ATTRACTIVE CITY WITH VERY NICE AMENITIES TO LIVE IN. THAT PRECLUDES HUGE WAREHOUSES, AND BIG RIG TRAFFIC.	5/20/2020 7:30 PM

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14	I think any changes to our landscape should ALL be voted on by the people of the city. PERIOD! Town Halls need to be and open public affair with plenty of advertisement to let residents share a voice	5/20/2020 7:08 PM
15	I would recommend making the sad mill into an open air venue with restaurants, markets and the required anchor stores, but putting an emphasis on small community owned businesses.	5/20/2020 7:06 PM
16	I do not approve of the zone change at Cottonwood/Moreno Beach as it is hillside and those tiny homes do not fit in with the larger equestrian lots along Cottonwood or larger lots to the east. Hillside homes are limited for safety reasons also. Why is there no discussion and plan to rezone w/c land nor aquabella land. Both are ideally situated for housing and businesses. Revert w/c land to the high end homes and diverse businesses/jobs that is was appropriately zoned for in 2006. Aquabellas 6.25 acres are perfect for high density housing that will satisfy the city's claimed requirement and is near transport and planned city center for entertainment/shopping/dining. I completely disagree with your commercial use for the NE and of the city. It is inappropriate for that area and is obviously sugar coated to make it sound wonderful when in reality once it's rezoned for commercial it won't end up being fine dining/high end retail. It needs to specify NO gas stations/NO truck stops/NO 30 ft high buildings as those are warehouses which do not belong in this location. 30 ft. buildings will obstruct our views of the hills to the south - our views are supposed to be protected. NO 30 ft. buildings. We have more than enough warehouses. The commercial zoning should not extend to Hemlock, but end as the current zoning shows. The existing general plan zoning is appropriate for the NE and should be adhered to. Theodore is the road to the dump and there are warehouses across the freeway- no one will seek fine dining at such a location. There needs to be enforceable rule that this commercial zoning will not encroach any further into the rural areas. We have Stoneridge and already planned City center for dining/shopping and there is NO need to siphon off customers from those businesses. The MASTER PLANNED multi-use trail is missing. A safe wide trail needs to be included in this section with a safe freeway over crossing to connect to the planned trails all the way to Lake Perris. Hemlock should NOT be put thru- it will turn into a truck route and speeding cars will race thru the currently quiet, safe neighborhoods at Sterling Ranch. Ironwood is more than enough road if people need to get to Theodore. Have these residents been notified of your planned destruction of their neighborhood? Have you notified the affected residents on Redlands that you're going to create a busy street right to the north of their homes? There are several homes along Redlands Blvd- this map appears to rezone all their properties to commercial. Not ethical or fair to them and should not be done. It also appears to change the residential homes in Sterling Ranch that are south of Hemlock into commercial properties. Have all those residents been specifically notified of this change to their property? Keep that small area along the freeway for offices/housing. No commercial, no warehouses at this location. Noise mitigation/night time light mitigation are not mentioned. This is residential area and there needs to be strict noise restrictions in place before any commercial building is permitted. Night skies are a treasure for the residents therefore there needs to be strict light restrictions on any commercial activity and no beeping trucks all night long. This is a wildlife area and their lives/routes need to be protected. Please keep the current zoning in the NE and remove this idea of commercial zoning. It is not appropriate for this area.	5/20/2020 6:36 PM
17	Stop putting industrial like WLC within 1 mile of residential areas. Put all industrial in one area around MARB and 215 where the rest is and there's rail and highway next to it and not residential.	5/20/2020 6:04 PM
18	I believe we are in great need of improving what's already there. The Moreno Valley Mall area along with Sunnymead Blvd are in need of huge attractive renovations. To me this is the doorway to the other areas of the city. Due to the view and close fwy access this should be the biggest improvement. If the city wants for visitors traveling the 60/215 to want to stop spend their money here you must make it attractive enjoyable and safe.	5/20/2020 4:28 PM
19	It's discouraging to see the city promote a "new town center" on the east end of town. It does nothing to bring cohesive planning to the city; it seems to be an idea promoted by special interest developers/landowners, maybe someone who promotes roundabouts and crammed Rancho Belago down our throats. From my point of view revitalizing existing streets in the city, such as Sunnymead, Alessandro, Perris would be better. It is a nightmare to drive H. 60 to the east, promoting more commercial development north of the freeway is not appropriate, especially along Hemlock, especially close to neighborhoods with large lots. There should be no building on our city's hillsides. I'm not impressed with any of the plans. Seems like the city is in a rush to fulfill some pie-in-the-sky planning by people who sit in offices, don't live in our city, and definitely do not listen to our residents.	5/20/2020 4:03 PM
20	Moreno valley can not become a concrete jungle. Moreno valley should work on beautifying and working on getting rid of crime. Before we could move forward, Sunnymead Blvd has become an eyesore with dead landscaping, homeless encampments, and drug sales. I don't want to see giant warehouses consuming our beautiful valley. We need to capitalize on the views that the city has to offer. Our representatives that we vote on should have the community interest first. And always the residents should have a say in how business may affect our taxes and property value.	5/20/2020 12:50 PM
21	Some of the Concepts are good low range plans, my concern is will people be forced to move from their homes with the mixed concepts near the Moreno Valley mall. Why wasn't Single One Stories Homes for Seniors included in the Vision?	5/20/2020 11:10 AM

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22 10:02 AM	Perris Blvd has great potential. The city currently though does nothing on code enforcement for the dilapidated apartments across the street from the new houses just built near home depot	5/20/2020
23	There is a great opportunity with the current vacant land mass in the Downtown Center. The undeveloped Aquabella site and the proximity of the two hospitals make for the perfect location to develop senior and age-in-place housing with the nearby commercial and entertainment options. Only have a concern at what is meant by a "corporate campus" should it be anything other than an office park. Although, I believe the MV Mall may experience a downturn in the near future it is good to be prepared with a future redevelopment plan. Not sure how or where the proposed concept expects to put in apartments except on the mall parking lots which would then hinder commercial retail. Sunnymead Blvd is in dire need of business rehabilitation but not entirely sure properties can be consolidated into large enough collections to permit better development options. This would be a prime location for redevelopment and the city should establish some sort of incentives to make this happen. The Alessandro and Perris corridors should also be considered for development focus to keep these areas vitalized. Expanding to area outside of existing development will only diminish the capability of existing business to thrive. The residential density changes appear to be viable options although those occurring adjacent to existing development could be of concern to neighbors. Cottonwood and Moreno Beach would seem like a location close to existing commercial and freeway access however most of the mapped location is hilly with large rock outcroppings that should not be disturbed. The add character to the area. The Business Flex Area is in dire need of redevelopment and should be aided by the city. Alessandro at this location is the western entrance into MV and it should make a better statement about our community. Two opportunity areas were chosen last due to the limited need or their viability. The District is already a lost cause with the recent installation of a small warehouse that could have been a perfect area for apartments to then vitalize the commercial district that has flourished for many years. Freeway Office/Commercial is to remote from the majority of the city and if it is considered then it would draw down or dilute similar opportunities in the Town Center or the Corridor plans. Additionally, Hemlock should not be permitted connect and go through the existing residential neighborhood. This plan also reference residential north of Hemlock but no mention is made on the residential density that would be most appropriate to compliment the O/C. This is the rural area of town and extreme care should be taken in any plan that attempts to alter that existing land use. Community diversity is important to a vibrant way of life for all concerned.	5/20/2020 9:45 AM
24	Truck traffic in the northeastern section is a bad idea. The amount of pollution it would bring to those residential areas would be detrimental to the quality of life there. The truck route through the canyon on Redlands already causes too much traffic and pollution. Building a wider road on Locust to get through to Colton would be a huge and expensive project. Moreno Beach does not need expansion. It would be a waste of taxpayer dollars. That is definitely not a project that would benefit our city in the foreseeable future. We already have the highway being expanded. Rehabilitate the Mall area and other already established city streets that sorely need it.	5/20/2020 7:35 AM
25	The downtown plan is good. We need a center that attracts people and larger parks that can compete in grandness with other large regional parks. We need a major attraction and development on that area which is undeveloped at the moment. Sunnymead boulevard is our downtown and we need to develop it. What I DON'T want denser housing. We can make single family homes more affordable by having more built (supply and demand). Our city is hard enough to get in and out of (traffic) we don't need higher density housing making it harder. I also don't want warehouses on the eastern end of our city. Keep that as small as possible. I DO want Our Hills. They are our natural beauty and character. Let's preserve them as much as we can, build around them, incorporate them into our parks and other developments. I would like to have bike and horse trails connecting all the hills in our city. North east should be rural with large horse capable yards and horse trails. Thank you. Please make our city a good place for people to develop.	5/19/2020 9:35 PM
26	The entry to the city on the west end is important. The mall and Edgemont need to be addressed. In the coming years riverside will have a new hospital and we have the opportunity to capitalize on improving a blighted area before we continue with development on the east end.	5/19/2020 8:14 PM
27	The needs of present and future residents drives my choices. We all pay taxes to live here, and will be prouder saying we're residents of a city that looks to how it can serve us better. The concepts I chose, I believe, will make citizens more apt to spend their time and money in our town. The overarching goal is to make Moreno Valley more amenable to us all, right?	5/19/2020 7:54 PM
28	You can concentrate on making the city more city like, leave the rural areas rural. The silent majority on the east end of town are FED UP with you out of town living politicians and developers attempting to rezone our residential 1/2 acre lots into smaller, more condensed 1/8 acre lots and adding more and more industry in our community. FED UP!!!!	5/19/2020 7:50 PM
29	I think the problem with all the plans is the proposed world logistic center and the horrible effect on traffic along the 60 freeway. If people can not easily move around the city, it will not matter what you plan. Excellent growth will not happen.	5/19/2020 7:31 PM
30	While I am not opposed to all development in the northeastern part of the city, I am greatly opposed to making Hemlock a thru street to Theodos. There is already traffic on Hemlock when the freeway is backed up, but at least that is not running through a neighborhood. As a	5/19/2020 6:32 PM

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	parent of small children living a few houses away from Hemlock. I am greatly opposed to increasing traffic through my neighborhood unnecessarily. This is a quiet area and it would negatively impact the residents of my neighborhood, making the streets less safe for my family.	
31	The Eastern section of the city is a desirable area to live and shop. I think the Kaiser and County hospitals in close proximity could be the cornerstone of medical offices, housing, bike paths, walking paths. I have lived in Moreno Valley since 1983 I currently live in Northeast Moreno Valley in the tract near Ironwood and Pettit for the last 21 years. I love it here, it frightens me to think that the beauty of the area could be ruined forever by building warehouses south of it. The San Jacinto Wildlife Area will be threatened and the beautiful outdoor views and will be diminished or disappear. I realize its all about money in someone's pockets and someone's power to sway opinions; however, but I believe it is very short-sighted to continue on this path. I truly hope that Northeast and Southeast Moreno Valley's future will be given a chance. I feel it is the jewel of the city, and that there is a market for buyers looking for larger lot size tracts. The houses in our neighborhood are bought quickly after being placed on the market. Thank you for your time and consideration.	5/19/2020 6:30 PM
32	I do not want a zoning change for the area north of the 69 between Nason and Theodore. I want large lots to be kept intact.	5/19/2020 5:08 PM
33	The Moreno Valley Mall has already been identified by the residents as the main shopping center until businesses started to leave. There should be encouragement to retain businesses and develop opportunity for more businesses in this area. There should be no more housing as I would not consider it safe in view of the increasing robberies. It would be very easy for a robber to escape into housing if there was further development. It would be much better to have a one area shopping in Moreno Valley instead of crossing over Day St. to go into Riverside. The most important is safety of residents. We need to feel that we are not going to be assaulted when going to the stores. This is very prominent at night. The District is a great area for businesses also. I don't believe there should be a mix of stores and housing. Please make sure that before further building is considered, that any new construction is not going to be completed, occupied for a short time then abandoned. We have had too many abandonments. Also before there is further developments, we need our streets repaired. Even our main streets are shameful. Every time I drive, I am concerned that these broken streets are going to cause damage to my car.	5/19/2020 1:38 PM
34	I like the idea for a better downtown. Open air shops would be nice with some outside eateries. Please no more warehouses. Moreno Valley has too many already. We need venues for residents, not more huge buildings with lots of trucks and poor paying jobs.	5/19/2020 10:54 AM
35	Changing areas of existing low density residential to high density residential and/or commercial is absolutely wrong. Expanding commercial and high density housing, such as south of the freeway on the east end, or along primary corridors makes sense.	5/19/2020 8:41 AM
36	Utilize existing empty warehouse, store fronts, etc. focus on creating businesses that will actually bring in jobs for the residents of our city. Stop with the idea of taking empty land and putting up warehouses that will cause truck traffic and will increase poor air quality. There are too many empty buildings in this city to make it logical to build more.	5/19/2020 8:00 AM
37	We do not need any further warehouse developments in this city. We do not need more high density housing! We need more high income jobs such as medical etc. Stunymende corridor could use more independent businesses such as restaurants as etc. Like is done in Long Beach. We do not ANY pot shops!!! We need much better traffic control and movement. That means less large trucks in our town.	5/19/2020 7:56 AM
38	Keeping the east end of Moreno Valley rural as was planned. There is a lot of room for expansion in the Moreno Valley Mall area and revitalization to the southwestern area.	5/19/2020 7:50 AM
39 6:57 AM	There are basically no public parks north of the 60 freeway even though there are several schools and newer housing in that part of town. Services seem to be concentrated in the area south of Alessandro.	5/19/2020
40	Anything but large warehouses. Bring more higher paying jobs.	5/19/2020 2:51 AM
41	Moreno Valley is in desperate need of services for its youth. There are very few options available for our youth. We are in desperate need of youth centers- YMCA, Boys n Girls Club, another Recreational center on the opposite sides of the city. I have helped coach both boys and girls soccer teams. This past year our 11 year old and 14 year old girls teams were forced to practice at the park behind the baseball field on Perris. The park is at the end of Webster Street. This location meant that we shared a small uneven field with homeless individuals, who at times were either drinking or consuming other substances. During winter months we were forced to use portable work lights to provide us visibility. Few parks throughout the city have lights to provide safety and extended use of areas to the thousands of teams that constantly compete for field time. Our school district has a few sites with lighted fields but the process to obtain permission to use their facilities have become more extensive and expensive. Quality of life in Moreno Valley is closely tied to health and prosperity of its most valuable asset- its children.	5/18/2020 10:52 PM

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42	Taking care of the Homeless problem all through sunnymead blvd. Sunnymead blvd is a very busy street, ultimately if it were to be developed as described & given some TLC I believe it would have a more positive appeal to the city. Homes need to be built more affordable in certain areas.	5/18/2020 8:10 PM
43	You need to stay away from rezoning current large lot housing areas into smaller lot areas. There should also be buffer areas between existing houses and small commercially zoned areas.	5/18/2020 7:39 PM
44	It would revitalize the older areas of Moreno that gets left behind, as the city develops. It would also increase property values and encourage residents to take pride in their property.	5/18/2020 4:38 PM
45	No more home building north of Ironwood Ave. between Nason and Moreno Beach Road.	5/18/2020 4:24 PM
46	No warehouses, no warehouses! No low-income housing or new apartments. Townhomes maybe, but there are enough people here we don't need to encourage more people to move here. Put in upper end housing in the city not these cracker box cheap housing which fly up and look ugly. Ranch style homes, single stories. Take what is existing and fix what is bad about the city, the streets, the ugly buildings and vacant fields. Put in bus stops, put up an art center, no more sports fields, we have enough of those. Build a professional dramatic arts theater, NOT an outdoor theatre. (Basically a park again). NO warehouses, they are ugly and it is not true that they bring jobs to our city, they are low paying, menial jobs. Keep the natural beauty to Moreno Valley by enhancing it with beautiful nature, we don't want ugly large warehouses! We also don't need any new restaurants, we need quality dining areas, with brand name stores and eateries. Classy places. I want to see some of those promises that you made for our area. Ranch homes, etc. We don't need any more hamburger places or taco places. I've lived here twenty years and seen it go down hill. Save this town.	5/18/2020 10:44 AM
47	We don't want another L.A. or Ontario. We like the open space, no homes built on top of each other like the housing tracts that keep popping up.	5/18/2020 10:40 AM
48	Our family is in favor of the warehousing plan south of the 60 Freeway and Redlands Blvd. Area. We feel this would be the best use for this property. The office and commercial use seems appropriate for the area north of the 60 Freeway in the Redlands Blvd/Moreno Beach location. Our family consists of 5 adults in 2 homes in Moonlight Rim.	5/18/2020 10:13 AM
49	LEAVE THE N/E AREA RURAL! R2 MINIMUM! NO WLC!! QUIT CATERING TO BDDO!	5/18/2020 8:43 AM
50	Revitalize the mall and areas around the mall, keep the rural areas rural and allowing horses, limit the number of logistics centers, include schools within new communities being build	5/18/2020 5:31 AM
51	I have been a home owner here for 20 yrs. what we Definitely do not need is more warehousing or industrial. The City needs entertainment & shopping in a destination type of plan. The area around a City Hall with the new amphitheater is a good place to build this concept. The City also needs a Sports Complex type of park w/ aquatic. The City also needs a nice senior center & a large library similar to that in the City Of Fontana	5/17/2020 8:21 PM
52	Upgrade Sunnymead Blvd first because it is such an eyesore and it is what people see off the 60 freeway.	5/17/2020 7:12 PM
53	Make Ironwood a two way lane in each direction between Pettis Blvd and Redlands. I am sick of the elderly people in the community only thinking of themselves. We desperately need a sidewalk on Ironwood Avenue between Vista de Cerros and Redlands.	5/17/2020 6:05 PM
54	Having a higher density is good, but they need to be near Transit Centers, shopping, sidewalks, lake paths, and bus stops. I hope the city doesn't allow anyone to increase housing density just because they are willing to build them on their land. If the City allows high density on just any lands, then they are making life very difficult on those who need affordable homes. You could be placing them in a fresh food desert or a public transit desert. This is one reason that the Residential Plan's eastern site needs to be removed. The other reason is that I am sure our hills were listed as one of the main reason people like living in our town. Hills that are not littered with homes make our town attractive and is a major selling point for our quality of life. The Downtown District is where many affordable homes should be located because of the proposed transit center. We need a wide variety of housing from the high density affordable to half acre and larger. The City once paid for a study that showed we needed a large portion of our city which could allow for expensive homes on large lots. This was to allow for business owners to live where they open a business. This was considered a major benefit to attracting additional business in our city and keeping them here. This area is now mainly limited to the NE part of our City starting at Vista De Cerros Dr and moving towards the badlands. We need complete streets which allow for very safe bicycling all over the city. We need to stop building warehouses/logistic centers and this includes the 40 million sq foot World Logistic Center. There are studies to show that those who live in cities with polluted air are much more likely to die from COVID-19, but that is only one of the many health problems they bring into our community. "See this study from Harvard and this study from the Netherlands for the latest research into the link between COVID-19 and air quality. Warehousing should not be approved across the street from existing homes or whose trucks drive by existing homes. Our City Council majority was put into office with warehouse developer money and they approve every warehouse that comes before them. They even allow truck routes to pass existing schools which impacts the health of children and staff. Warehousing currently	5/17/2020 4:18 PM



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provides very few jobs per acre and will only become worse with the increase of robotics/automation. The General Plan Update needs to be able to provide lands for other types of job producing businesses which do not also allow for warehousing on the same lands. Our roads need to be paved with more potholes fixed. Part of the problems all the warehouse trucks. Warehousing needs to pay their full development fees to both the City and County. Not some reduced amount approved by the City Council.

55 The proposed options take into consideration for the need of important things lacking in Moreno Valley 3/17/2020 12:34 PM

Valley which include more jobs for residents, increasing residential areas and identification of the city. They also address the need for attractions within the city. There are very few areas in the city for recreation and gathering, outside of the mall which is very outdated. While these plans are good, I would like to see rather than constructing new buildings and facilities, rather to update and renovate areas that already exist. This is especially true for areas that can be seen from the freeway. It makes no sense to construct new buildings and structures when existing ones make parts of the city look like a ghost town. It is very confusing to those looking in at the community. Perhaps a look at what kind of businesses will be successful in our city is needed. For example, in the Stone Ridge Town Center, there is a super Target which attracts business. However, the stores within the plaza next to the Super Target have gone out of business (ex. Dress Barn, Kirkland). There needs to be businesses there to replace these two. There is also a Best Buy outlet that is only open three days a week, making the majority of the week a void in business traffic. There are also adjacent business building which should be filled with small businesses such as a shoe store, dry cleaner, scribs store, etc. As of now, there is just an H and R Block but the rest of the buildings are mainly empty. This is a very nice area which should be attracting more business, similar to the shopping center at Citrus City Plaza in Redlands. It is almost an identical layout. Yet, there is a lack of attracting the right kinds of businesses that meet the needs of the community, such as a Marshalls or TJ Max/Home Goods. While there is a TJ Max/ Home Goods in Moreno Valley, it is located in an area of Moreno Valley that residents on this side of the city would rather not go to. It is also very crowded and parking is often full because stores like Ross/TJ Max/Marshalls are a need for most people in the community. Sadly, many in Moreno Valley who live in single family homes and have expendable income would prefer a more safe shopping experience but with prices found at these stores are often left to drive to Redlands or somewhere outside of the city to do their shopping. Thus, a store like Marshalls or a second TJ Max would be a good option for that area. There are just many areas in the city where I see empty plazas and failed businesses which make the city appear depressed. There needs to be a renovation in the city and a revival in creating businesses that will meet the community's needs in regard to product, which will in turn create and sustain employment for residents.

56 I moved to Moreno Valley last year, but I have worked here for more than 16 years. Based on what is shown in each plan, I made selections based on growth that would be beneficial for families and the city of Moreno Valley. It is my hope that expansion does not cause changes that would put families in a difficult place, nor would it make it harder for existing families to remain in Moreno Valley. It is also my hope that the financial impact to families/resident will be minimal or none at all - meaning, I hope this will not lead to families being in a position where they cannot afford to live here. 5/16/2020 2:07 PM

57 The Preferred Plan as illustrated for Sunnymead, Alessandro and Perris usage is cohesive to promote and offer more jobs for residents and convenience of location for services and products. As illustrated in choices #1-3, The Downtown Area would allow local MV residents and residents of neighboring communities to enjoy and digest from the daily stresses of life providing quality pass times. Choice#4 The Office buildings along Hemlock on the northern side of 60FR WY allows for good paying office jobs to come to MV which are currently scarce for the professionals in the area. Choice #5 Suggestion/Question: The vacant land between Lassalle, Nicson, Iris and Oliver was said to become a medical corridor those businesses would also offer local residents that are currently in the medical field the job opportunities that MV is also currently lacking, and would attract quality residents to become part of our community. Although this was not an option, it should be the Mixed use offers options that were offered are not really needed instead those current venues should incorporate better quality shopping experiences to attract quality shoppers especially in the MV Mall. Another option that was not offered and should be on the table to better and attract more quality residents is a water-park, given that we live in a very hot area and with nothing currently offered, would be a great place for our youth to digest and enjoy on the vacant land between Theodora and Redlands, residents don't just want quality shopping option but want good options of entertainment for their families. 5/16/2020 9:03 AM

58 We should revive the Moreno Valley mall. It is in a great location however it should be more appealing to people of all ages. 5/16/2020 1:18 AM

59 More affordable housing, would be a great start, as well as better selection of stores for example hobby shops that focus on certain niches. Something similar to Little Tokyo in L.A would be a nice addition, since there is a huge interest in Asian culture and products. Having big events closer to or in Moreno Valley would offer better opportunities for people to come together as a community such as concerts and conventions. 5/15/2020 9:29 PM

60 The City needs a downtown area and the downtown center provides the best opportunity for this. Sunnymead Blvd has some potential but is limited by existing development and lot sizes. Maybe it could be developed with a unique theme that could serve as a gateway and 5/14/2020 4:18 PM

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be more attractive as a destination. The concept on the east end is also important to retain as there needs to be a way to bring traffic to the city for those entering from the west. There are great views from the Badlands and Moreno Valley should take advantage of this opportunity.

61	Moreno Valley needs an identified downtown similar to Victoria Garden, or new design but same concept. Presently the town is a patch work of eating, and shopping establishments. Even the planned outdoor city auditorium is not central to a plan, but for city hall, police, recreation center and old retail.	5/14/2020 11:05 AM
62	The 'downtown' district with the University Health Hospital is not what I would consider 'downtown'. We need a vibrant thriving Mall area and housing is essential. I noticed that the warehouse plan is not listed and all and that is not a good plan for Moreno Valley. We need to grow out of a bedroom community into a self-sufficient community offering jobs and not just a few warehouse jobs.	5/14/2020 9:52 AM
63	No more warehouses. More focus on improving infrastructure make Alessandro actually look good.	5/14/2020 1:11 AM
64	Curb appeal is important. Creating a vibrant area that catches the eye of those driving by as well as easy access to desirable entries, attractions, and work places, would be a big plus for our city.	5/12/2020 7:36 AM
65	The Downtown Center concept is the only one which includes provision for a Performing Arts Center. The one idea that has any hope of creating a destination in the City. The Business Flex concept at least includes the present Civic Center where an outdoor amphitheater has already been approved next to City Hall. This project is likely to result in the construction of an even larger facility within a few years to accommodate the growing appetite for cultural events. With the emerging re-evaluation of shopping malls in general, the Community Center concept at the Moreno Valley Mall presents the greatest possibility of actually taking ownership of existing properties and re-designing from the ground up an attraction to make the City a destination for all of Southern California. This should be the time when we enlist the ideas of all the best minds for the celebration of the Southern California World's Fair-2038. By comparison, Flushing Meadows, New York with be only a prelude. We could build an exposition park around the concept of "Gateway to the Stars: Exploring Man and Beyond."	5/11/2020 10:46 PM
66	Less wear houses and more of business centers also places serves the community	5/11/2020 9:05 PM
67	Prefer development around Moreno Valley Mall as it is already going in that direction. Freeway access is close to being in place, and it makes sense. Running the country feel and disrupting the East end is absurd. Everyone knows that warehouses will soon be automated to the point that employment will be limited but access truck traffic with accompanying crowded roads and pollution will be with us forever. The idea that this plan is to reach as far as 2040 and yet our so-called leaders cannot see 2 minutes in the future speaks to the ignorance in leadership.	5/11/2020 7:40 PM
68	Fix up the dump we have! Sunnymead Blvd. looks like a trash pit. The Floor and Decor Shopping Center could also use a lot of help. This city becomes more and more disgusting each month. We have enough warehouses!	5/11/2020 3:57 PM
69	Expected a greater range of housing.	5/11/2020 12:33 PM
70	The city center idea was envisioned years ago but then nothing happened. This idea would create an identity for the city with a central core and a true downtown instead of a very scattered spread out city. And if some destinations can be put into this idea to attract visitors to the downtown like entertainment venue or a family destination (years ago a water park was envisioned for the area). The issue is that a very different idea of homes and schools has built in this area and the downtown concept might be in conflict with what exists now. The Nepa Bella community would have been a desirable development in this area but so far never built. Senior communities are in demand as the population ages and if a downtown area develops near a high end senior community it would give the area nearby shops, parks, city businesses all nearby to a community that could attract people to move here as retirees and also be close to medical care.	5/11/2020 11:19 AM
71	We need less warehouses if we want a better city. Low paying jobs make a low thought of city. Moreno Valley already has a poor reputation for being scummy. More high density housing means more cars parked along our streets. Sunnymead Blvd should be a hip place that people want to come to. Not zip thru. A good example is the Menrovia downtown or Redlands State Street.	5/11/2020 11:05 AM
72	The first issue to deal with is the aging out of current housing stock especially in the are bounded by Perris on the East Fredrick on the west Ironwood on the north and Jib, on the south. Given the current 60 freeway config it seems that Sunnymead Blvd needs drastic updating. This would create an ideal new identification for the city. Good examples would be Menrovia or Montrose. We need an I'd other than warehouses. We need to change the scummy image and show everyone what a vibrant community this can be.	5/11/2020 10:53 AM
73	Moreno Valley is in need of more restaurants, especially on the east side of town, and needs better shopping choices. Our mall is an indoor swap meet, which has nothing to offer. I drive to riverside to shop, and eat.	5/11/2020 10:10 AM

74 I like the Downtown Concept because it takes advantage of the booming healthcare industry 5/11/2020 9:46 AM and increases walkability to services for surrounding neighborhoods. But it doesn't address the under-utilization of the Moreno Valley Mall--if there are issues preventing redevelopment, then that is a shame. It is a huge blight that will only get worse as retail continues to contract. We don't need a Carousel Mall like San Bernardino has. Every effort should be made to find partnerships: federal, state, UC Riverside, whatever to bring public \$\$ to bear to densify the property. The District Concept is already a bust given the huge warehouses going up along Ironwood now. They loom over the small houses to the north--too bad. I'd like to see greater density at the NE end of town (Theodore/Ironwood) but strip commercial is a dead end. I understand there will be trucks and corner commercial to serve the warehouses south of the freeway--that's a given. The land north of the 60 (east of Redlands) is held by banks and OC developers who are upside down on the value and are just sitting on it and I'm guessing aren't going to develop it until they can develop it at a profit. Again--too bad. Now its just used by homeless camps. At least they have a place to live.

75 We need more shopping, entertainment, and dining. 5/11/2020 7:19 AM

76 The first priority of the city needs to be to redevelop blighted corridors in older parts of the city 5/9/2020 3:13 PM such as Sunnymead Boulevard, Alessandro Boulevard, and Edgemont. Moreno Valley could create a redevelopment agency that acquires older buildings established before incorporation, renovate them while keeping their classic character, and support small business by having tenants maintain the properties. The history nature of these areas could be reflected in community projects such as murals, displays, and other activities held by the city. Sunnymead Boulevard needs to have its medians removed because it inhibits patrons from going into businesses and removal of the sign along Fredrick Street is recommended. Sunnymead Boulevard could be the site of a pedestrian mall where local events and businesses gather. The economic heart of future development for Moreno Valley will be the medical centers and office space being constructed there in the future. Using these as an engine, Moreno Valley needs to redevelop these older and blighted parts of the city to address issues neglected for decades. New businesses are needed to remove crime, homelessness, and blight here. A return to character that existed before the city incorporated also to not forget the identity that existed decades ago. A program where the city cleans up litter and doesn't rely on nonprofits or donations to do so is needed also as the current system is not adequate to address the problem. Models of redevelopment for downtown Riverside and Temecula are encouraged for Moreno Valley to analyze and study. For the corridor regarding the Moreno Valley Mall, I don't find it likely that business will survive into the long term future. Once it loses its last tenant, Macy's it may cease operation. To succeed that plan, the site could be renovated into traditional and medical office space with some retail. I encourage construction of this and diverse housing options such as apartments, condominiums, and similar. The current vision for Day Street I also support. I support the eastern business park corridor between Moreno Beach Drive and Theodore Street, though I believe the zoning for it could proceed as far north as Ironwood instead of Hemlock Avenue. This allows more needed industrial development in the city and diversification in the economy. Areas north of Ironwood I believe should reflect the request of resident there that they remain with ranch style homes and open space. Let the character of this part remain. There will never be the demand needed to buildout the World Logistics Center zoning with industrial or logistics tenants as stated. I encourage industry along the eastern corridor with State Route 90, but believe it should have zoning south of Cottonwood Avenue. The areas south of it should be considered for diversified uses from mixed use, medical, open space, residential, traditional business park, recreational, and otherwise. A much greater area of open space needs to exist between any planned industrial areas and that area. The city could require developers to fund this. Moreno Valley has a history of over reliance on sectors such as housing, construction, retail, logistics, and service industries to provide local employment. Changing the diversity can support a more positive development future for the community. Future industrial buildings such as distribution centers should have color palettes similar to the building owned by Alah that are earth and natural tones which blend into the landscape. I support the city center concept and encourage its development. Moreno Valley should consider and make it a priority to establish recreation centers throughout the community and a diversified set of facilities not centralize its services and events at these locations. Beyond the age of elementary school, there are few locations that youth and the community can access and there is a massive gap in the amount to do and go in Moreno Valley compared to the region and cities its age. They should be spread out and rotated across Moreno Valley. Moreno Valley needs more events sponsored by City Hall than the few that occur each year. One about community pride and heritage is key. Moreno Valley can produce local employment through its own expanded services and construction by creating more facilities. In every major area of the city there should be a recreation center with a pool, skate park, open space, community building, computer lab, and similar uses. Traditional libraries are no longer relevant. I encourage the development of computer labs and space with free public wifi residents can access and a digital archive of reading content. The city needs equity for free internet as highlighted in the Coronavirus pandemic and public education. More amenities are needed for residents of all ages, not just families and elementary aged youth. Moreno Valley can no longer rely on the suburban model of a bedroom community. It needs to diversify and have its own entertainment and resources. I encourage the city to relocate the planned amphitheater to another location more centralized in the city. Some have recommended Lanselle Park or Morrison Park. Perhaps the first site should be the planned downtown corridor. Its current location is overrun with homelessness, blight, and crime. The city should consider constructing a performing arts center, citrus or agriculture oriented park, nature center at the eastern end of the community adjacent to the San Jacinto Wildlife Area. An aquatic center, public pools.

77 basketball courts in parks, general sports park, BMX park, motorsports park, and similar types of facilities are elements the city could plan and develop now. Their locations should be spread throughout the community and not centralized into one area such as the downtown corridor or eastern end. These are facilities operated by city staff and employed locally. Moreno Valley should in the open space area adjacent to the San Jacinto Wildlife Area encourage development of private campgrounds, golf courses, trails, a cemetery, and similar uses to compliment the state and county resources nearby as well as to encourage visitation and tourism in the city. Through the community there is too much reliance on low density, multifamily housing. Currently there exists a shortage of diverse types of places to live from condominiums, apartments, single family housing, and multi story units. The urbanization of areas and prevention of suburban sprawl is highly encouraged. However, increased density for residential zoning should not come at the expense of trails and open spaces. The whole system needs to be kept in tact and funded. No development should prevent its connection. City facilities such as parks and trails are blighted also and need renovation too to encourage use.

78 The plan for the city is dependent on other issues, mainly transportation access to/from the city. Without improved roads or other means, continued growth is useless, as businesses and 5/8/2020 5:42 PM

LETTER

RESPONSE

or residential growth will not want to locate here. We must improve transportation corridors to enhance the great location of our city.

78 "Press-on" May God bless Moreno Valley! 5/8/2020 5:41 PM

The current Climate Action Plan (CAP) and General Plan/Draft EIR (DEIR) fails to address most of the comments you have read above. Such as not providing a specific zoning which will allow for more warehousing/logistic centers. The public deserves to know which lands are spelled out specifically for warehousing. As Table 3-2 at the top of the page reads there are only two main concepts our City should focus on during this process the Downtown Center and the Community Center Mixed Use.

The Final EIR must analyze how those concepts listed in Table 3-2 at 10% or lower will divert developers/users, demands from the two main concepts mentioned above. If all areas are made open for possible changes, then the two which people have expressed a desire will struggle to realize their full potential.

The City must change some its designated truck routes which pass sensitive receptors like homes and schools. Heacock Street passes three schools and also homes and is still designated a truck route. This is all part of what makes much of Moreno Valley south of SR-60 a state designated disadvantaged community and shows our city doesn't truly care about Environmental Justice. This issue has been told to the city many times, but now the General Plan must evaluate all truck routes and make changes to allow diesel truck to safely reach nearby freeways and also protect the health of our residents.

During the General Plan Advisory Committee (GPAC) meetings people expressed many times they did not want any more warehousing. No residential density changes or commercial in the NE part of the city. The Final EIR needs to justify going counter to that which was overwhelmingly expressed in Both Community Surveys, GPAC meetings as well as Planning Commission and Council meeting. How can the CAP/DEIR fail to heed the majority voices on those concepts in Table 3-2 which are less than 10% at the expense of fully developing the top two concepts? The General Plan and Final EIR must analyze how many additional years will it take the top two choices to maximize their true build out if almost everything listed in the table is made available for development as part of the General Plan/DEIR/CAP?

Please keep me informed of all meetings and documents on the CAP/DEIR and Housing elements.

Sincerely,

George Hague

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2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

3 The General Plan includes policy EJ.1-9, to "Designate truck routes that avoid sensitive land uses, where feasible." Truck routes are regulated by the Municipal Code. As detailed in the Draft General Plan Circulation Element, "Truck traffic on City streets is restricted to specific routes that are designated for thru traffic of trucks over three tons; the truck network system is identified in the City's Municipal Code. These truck routes help to facilitate the movement of goods throughout the city, while providing a connection between major highway facilities (i.e., SR-60 and I-215) to local roadways, such as Alessandro Boulevard and Heacock Street. Moreover, truck traffic is restricted to these designated roadways, unless otherwise authorized by the California Vehicle Code, in order to minimize wear and tear on City streets and promote safety on residential streets." Refer to Section 4.3 of the Draft EIR for impacts related to air quality.

4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

5 Concluding comment noted.

Letter I-17

From: George Hoque  
To: Chris Ormsby  
Subject: Comments on GPU/DEIR/CAP  
Date: Monday, May 17, 2021 5:29:20 PM

Good afternoon Mr Ormsby,

RE: IV Moreno Valley's General Plan Update (GPU), Draft EIR and Climate Action Plan (CAP).

I am very concerned that the City's Climate Action Plan (CAP) fails to reduce our Greenhouse Gas (GHG), particulate pollution, and impacts on air quality in our non-attainment area. To meet State and Federal legislation/goals Moreno Valley must have 2021 Base Line data. The CAP must have verifiable analysis every two-four years to show progress towards meeting those state and federal standards. Then the City must have plans to adjust the trajectory/mitigations when not meeting intermediate goals towards meeting those standards. Failing to incorporate these steps into the proposed CAP makes it inadequate for the City to meet its fair share of reducing its fair share of GHG, particulate pollution and impacts on air quality.

The CAP needs to also analyze what happens if the Federal government takes over the SCAQMD area because we do not reduce the pollution to the standards they have set. Such as losing money for roads and limits on activities of our every day lives. We must reduce our fair share to help avoid the federal take over and the proposed CAP fails to do this.

Additional actions that must be included Moreno Valley's Climate Action Plan (CAP):

- **Encourage green roofs, parks, street trees, and other elements that can reduce ambient air temperatures and filter pollutants from stormwater runoff and the air.** Adding greenery along streets makes walking and biking more comfortable and appealing.
- **Design buildings with adaptation and resilience in mind.** For example:
  - Modular buildings can more easily be moved, renovated, and deconstructed as a community or tenant's needs change and as climate-related impacts change. Strategies include using exposed mechanical fasteners, disentangling utilities from the structure, using moveable walls and ramps, using standard-sized modular building components and assemblies, and providing easy-to-understand information on construction drawings and documents.
  - Buildings designed for passive survivability – meaning they remain habitable if they lose external power for an extended period – can help ensure that even if the power goes out, the building will stay at a safe temperature. Because passive survivability techniques such as better insulation and operable windows often save energy as well, they can also save occupants money on energy bills.
  - **Coordinate land use and transportation infrastructure decisions, and incorporate climate change projections into these decisions.**

- 1 The DEIR uses a 2018 baseline to establish the baseline existing conditions. This baseline represents existing conditions as of 2018 in addition to recently approved projects and pipeline projects. The DEIR baseline was prepared using the City's best estimate existing and foreseeable development. The 2018 emissions inventory is included in the CAP, and then will update the inventory periodically. Chapter 5 of the CAP outlines the City's Implementation, Monitoring, and Reporting requirements for the CAP. Implementation and monitoring are key to ensuring that the City is successful in reaching those targets. The City will use an adaptive management approach to CAP implementation. Adjustments to management actions will be made as needed to support continuous improvement based on measured results, monitoring effectiveness, new technology, or in response to deficiencies in program assessment results. The City will periodically monitor and report on CAP implementation activities. The monitoring report will include implementation status of each action and progress towards achieving the performance targets of the corresponding emissions reduction measure. The monitoring report will also include information on the status of the federal, state, regional, and local level emissions reduction strategies.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 3 The comment suggests a list of measures for inclusion in the CAP. The CAP was prepared as a qualified CAP wherein emissions were calculated based on well documented and accepted guidance for emissions calculations such as CAPCOA and other sources. The City evaluated a wide range of GHG emission reduction measures, and included those that would be feasible to implement and would achieve the required GHG emission reduction goals. Emission reduction estimates based on various measures are conservative and account for the low end of emissions reductions in order to provide a conservative analysis. While future development may implement measures that go above and beyond what is required by the CAP, it would not be required to meet the City's goals.

LETTER

RESPONSE

- Reducing water consumption
- Reducing the amount of garbage
- No gas appliances in future construction
- Require the Moreno Valley Utilities to allow all large buildings to maximize covering their roofs with solar instead of limiting solar usage to no more than 50% of the building's needs. Allow all future warehousing construction to cover their entire roof with solar to make it possible to sell electricity to the grid.
- Complete bicycle paths throughout the city
- Build/Zone high density housing only where there is regular public transportation.
- Require solar on apartments.

Please keep me informed of all meetings and documents related to the GPU/DEIR/CAP.

Sincerely,

George Hague

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4 Concluding comment noted.

Letter I-18

**From:** [George Hague](#)  
**To:** [Chris Ormsby](#)  
**Subject:** II Comments on Moreno Valley's GPU/CAP/DEIR & AG's letter on warehousing  
**Date:** Monday, May 17, 2021 4:48:07 PM  
**Attachments:** Screen Shot 2020-05-28 at 4.21.37 PM.png

- Untitled attachment 00683.htm
- pa0e1lma0e1950680768.in2
- Untitled attachment 00686.htm
- pa0e1lma0e1950990144.png
- Untitled attachment 00689.htm
- pa0e1lma0e1950990432.png
- Untitled attachment 00692.htm
- pa0e1lma0e1950990720.png
- Untitled attachment 00695.htm
- pa0e1lma0e1950991008.png
- Untitled attachment 00698.htm
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- Untitled attachment 00716.htm
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- Untitled attachment 00728.htm
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- pa0e3lma0e1925830272.png
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- pa0e3lma0e1925830560.png
- Untitled attachment 00764.htm
- pa0e5lma0e333078688.png
- Untitled attachment 00767.htm
- AGs letter from George Hague.pdf
- Untitled attachment 00770.htm

<https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf>  
AG's 2021 letter on warehousing — including General Plan

Good afternoon Mr Ormsby,

LETTER

RESPONSE

RE: III Moreno Valley's General Plan Update (GPU), Draft EIR and Climate Action Plan (CAP).

Earlier this year the State Attorney General's (AG) office released the letter found attached to this email and in the link found above concerning warehousing impacts on communities as well as what cities must do to reduce their impacts. A portion of the letter is on the General Plan process and what Cities need to include and that is what I share when using quote marks.

"To systematically address warehouse development, we encourage governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and guide sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide."

The above paragraph from the AG's letter points out the importance of specifically zoning lands so the public knows where warehousing/logistic centers are permitted. The City must change the proposed flexible zoning to exclude warehousing as a possible use to realize the benefits listed in the last sentence. The way the city granted approval of the warehousing within the Festival project — along Ironwood Ave and east of Heacock Street — is a prime example of impacting nearby family homes without even a public hearing because of the "flexibility" of permitted land uses.

"Proactive planning can take any number of forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors can help avoid conflicts between warehouse facilities and residential communities."

The Moreno Valley Trade Center warehouse currently under environmental review is in direct conflict the AG's paragraph found above. This project would replace existing land zoned for family homes with a very large warehouse which would then be across the street from an existing neighborhood of homes. The General Plan must restrict such conflicts and General Plan Amendments must not be allowed which would allow such negative impacts on the health of Moreno Valley residents.

"In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities."<sup>27</sup>

A large portion of Moreno Valley south of SR-60 has been designated by the state as a Disadvantaged Community (DC) as seen in the map found below. This also happens to be where most of the warehousing has been approved. The General Plan Update (GPU), Draft EIR (DEIR), and Climate Action Plan (CAP) fails to reduce the health risks to the DC.

1 Comment noted. The comment introduces and cites sections of a document from the State Attorney General's office.

2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

3 Comment noted. The comment is referencing a project that is outside of the scope of the General Plan update. A project inconsistent with the General Plan land use plan would not be covered by the Draft EIR and would be subject to a separate site specific analysis including any proposed land use changes.

4 The General Plan has incorporated an Environmental Justice Element [www.moval.org/cdd/documents/general-plan-update/draft-docs/GP-Elements/08.pdf](http://www.moval.org/cdd/documents/general-plan-update/draft-docs/GP-Elements/08.pdf). Future development would be subject to applicable policies of the Environmental Justice Element. Additionally, information about the plan and environmental document have been provided in Spanish at [MV CDD: 2040 General Plan Update \(moval.org\)](http://MV CDD: 2040 General Plan Update (moval.org))



The fact that the documents are not in Spanish also fails to “promote civil engagement in the public decision making process” also shows the City is not taking seriously the obligation of SB 1000 — especially in our City with a high percentage of Latinos and speakers of Spanish.

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“The Bureau is aware of four good neighbor policies in California: Riverside County, the City of Riverside, the City of Moreno Valley, and the Western Riverside Council of Governments.<sup>13</sup> These policies provide minimum standards that all warehouses in the jurisdiction must meet. For example, the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors, and it requires a number of design features to reduce truck impacts on nearby sensitive receptors. The Riverside County policy requires vehicles entering sites during both construction and operation to meet certain California Air Resources Board (CARB) guidelines, and it requires community benefits agreements and supplemental funding contributions toward additional pollution offsets.”

“The Bureau encourages jurisdictions to adopt their own local ordinances and/or good neighbor policies that combine the most robust policies from those models with measures discussed in the remainder of this document.”

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The City must have a much stronger Good Neighbor policy. Only then we might prevent so many General Plan Amendments which put warehousing across the street from family homes. This needs to be incorporated into the GPU/CAP. While we have what some consider a good neighbor policy, it isn't being honored and must be strengthened. In the last four years at least four warehousing projects have been approved which are directly across the street from family homes with most allowing the street to be used by their diesel trucks. Our City's Good Neighbor Policy must be made much better to protect our entire City, but especially our Disadvantaged Community. The last sentence above mentions the need to have “robust policies from those models with measures discussed in the remainder of this document.” Those are found attached below/link found above and must be incorporated into our City's Good Neighbor Policy to better protect our Disadvantaged Community.

The GPU/DEIR/CAP also fail to address what are considered the three pillars of Health in All Policies (HIAP) as seen below in order to better serve and protect the Disadvantaged Community and to limit its possible expansion.

THE THREE PILLARS OF HIAP

**EQUITY:** Equity is just and fair inclusion into a society in which all can participate, prosper, and There is a distinction worth describing between equity and equality. Equality is about providing the same to all regardless of need or circumstance, but this only works if everyone is starting from the same place. Equity is about fairness, making sure people have access to the same opportunities. Inequities are unfair, avoidable, and unjust differences that are created when systemic barriers prevent individuals and communities from reaching their full potential.

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**PUBLIC HEALTH:** Health is a state of complete physical, mental and social well-being and not

5 Comment noted. The GPU does include a number of policies specifically aimed at increasing compatibility between land uses. For example, General Plan policies EJ.1-D states, “Work with the distribution and warehousing business community to improve outdoor air quality through improved operations and practices, such as planning for zero emissions trucks and vans. The GPU policies would be applied as future site specific development proposals come forward.

6 As stated above, the GPU includes an Environmental Justice Element and Healthy Community Element that incorporate a number of health focused policies. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

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merely the absence of disease or infirmity. Health is also a fundamental component of quality of life. A healthy population is a critical building block for a sustainable and thriving economy.

SUSTAINABILITY: Creating and maintaining conditions so that humans can fulfill social, economic, and other requirements of the present without compromising the ability of future generations to meet their own needs. This can be thought of in terms of environmental, economic, and social impacts, and encompasses the concept of stewardship and the responsible management of resources.

Moreno Valley's failure to incorporate this into the documents under review further shows their failure to address Environmental Justice and meet the needs of our Disadvantaged Community. Other Cities like Santa Cruz has already implemented HIAP.

Diesel pollution and its related impacts must be part of the health element the City is proposing for the General Plan Update (GPU) and as part of the Climate Action Plan (CAP) or it will be inadequate. The California Air Resources Board (CARB) believes siting warehouse facilities at least 1,000 feet from the nearest sensitive receptors must be a requirement by decision makers to protect families. Moreno Valley GPU health element must include this or our final health element will be inadequate and jeopardize the health of many residents.

Please keep me updated on all meetings and documents.

Sincerely,

George Hague

P.S. Please print out the entire AG letter in the Final EIR

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7 Impacts associated with stationary sources, diesel particulate matter, and sensitive receptors are addressed in Section 4.3.5.3(b) of the EIR. Emissions of toxic air contaminants (TACs) would be regulated by SCAQMD through permitting and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under SCAQMD Rule 1401. Further, the City's process for evaluation of future development that could be implemented would also include environmental review and documentation pursuant to CEQA, as well as an analysis of those site-specific projects for consistency with the goals, policies, and recommendations of the 2021 GPU, which would include an analysis of impacts to sensitive receptors. Additional measures that can be implemented at the project level have been added to the FEIR in order to facilitate future site design at warehouse and distribution center sites to reduce impacts to sensitive receptors. As concluded in the EIR, adherence with regulatory framework would ensure that future development would not expose sensitive receptors to TACs associated with stationary sources within the Planning Area, and impacts would be less than significant.

8 Concluding comment noted.

9 The Attorney General letter is included as a part of letter I-13 above.

LETTER

RESPONSE

Letter I-19

From: Sandra Hernandez  
To: Chris Ornela  
Subject: Sterling ranch home owner  
Date: Sunday, May 2, 2021 7:32:24 AM

Warning: External Email – Watch for Email Red Flags!

As a long time home owner in the Sterling Ranch neighborhood I am completely against the new proposition to change the land usage around my neighborhood it is in our best interest to keep things as they are following the existing land-use of 2006 it is beyond ridiculous to want to bring more development to our neighborhood as we already have noisy nights and noisy mornings with with the warehouses that were built south of the freeway next to the dealerships it is very noisy and has taken away the reason why we purchased this house away from the city therefore we are completely against any new land-use proposition that was developed in 2021 definitely not a fan of arts and land usage

Sandra Hernandez  
9513855930

Sent from my iPhone

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- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City’s RHNA allocation in accordance with State Housing laws.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with noise are presented in Section 4.13 Noise of the Draft EIR.

Letter I-20

May 7, 2021

Mr. Ormsby,

We are writing this letter regarding the 2021 Proposed Land Use Changes in the Sterling Ranch area of Moreno Valley. These changes are absolutely horrible for the beautiful community of Sterling Ranch. As homeowners in Sterling Ranch for 24 years, we oppose these changes. Just look around the city where small home lots are used and you will see cars parked everywhere, congestion, poor upkeep, and crime. Some people even put fences around the front of the home because of this. You don't see that in our area. That is why we moved here. Location is important to the value of our homes. This change will decrease the value of our homes as it does in the congested areas of Moreno Valley. Changing this is not acceptable to the homeowners of this area.

The commercial zoning that is proposed will bring congestion of big rigs, trailers parked, increased noise all day and night, pollution, high traffic for an area that doesn't have the infrastructure to support the additional people, cars, trucks, and more crime to an area filled with families. We know you believe that the diesels won't be driving through the neighborhood, but we disagree. We see it all the time as we drive down Redlands

1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City's RHNA allocation in accordance with State Housing laws.

2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Impacts associated with noise are presented in Section 4.13 Noise of the Draft EIR. Impacts associated with police protection are presented in Section 4.15 Public Services and Recreation. Impacts associated with transportation are presented in Section 4.16 Transportation of the Draft EIR.

LETTER

RESPONSE

south of the freeway. The diesels are diving on residential streets illegally all the time.

The only down side of living in our area is the traffic going through town, it is miserable, however, it beats living in town. Your proposed changes to this area will make the area intolerable. People I talked to about this proposed change said they will move out of Moreno Valley if this project moves forward. Don't wipe out some of the great areas of Moreno Valley.

We want to see the 2006 Current Land Use to stay in effect. Sterling Ranch is the one area of Moreno Valley where families can have space yet live in a city. Please continue this precedent.

Kind Regards,  
Charles and Kristy Horn

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3      Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

Letter I-21

**From:** Herb Hrowal  
**To:** Chris Ornelas  
**Subject:** Opposition to zone 2040 zone change at north east section  
**Date:** Monday, May 17, 2021 12:17:13 PM

Warning: External Email – Watch for Email Red Flags!

Hello,

My family and I would like to submit our opposition to the zone change at the north east section of zone 2040. Our residence is 27493 Walfred Way, which is directly across the street from the vacant field. We oppose the high density housing that is proposed there as it will disrupt the wild burro habitat there as well as devalue our investment in this neighborhood. We moved here 3 years ago from the south east part of the city due to the lower density housing and believe the additional traffic congestion will disrupt this quiet section of Moreno Valley.

Respectfully,

Herb and Lori Hrowal  
27493 Walfred Way  
Moreno Valley, CA 92555  
(951) 214-5510

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City’s RHNA allocation in accordance with State Housing laws. Impacts associated with biological resources are presented in Section 4.4 Biological Resources of the Draft EIR.

Letter I-22

From: Dave  
 To: Chris Ormsby  
 Cc: Ulises Cabrera  
 Subject: Public comment on 2021 proposed general plan  
 Date: Monday, May 17, 2021 11:05:09 PM

**Warning: External Email - Watch for Email Red Flags!**

Dear Mr. Chris Ormsby,

This communication is intended to be entered into public record.

I am writing as a resident of Sterling Ranch in Moreno Valley to express extreme concern, displeasure, and disappointment in the proposed General Plan for 2021 especially in light of the lack of representation for our district and the secretive manner in which this process has been conducted. Following are questions that must be answered before any official action has been taken.

Most directly I am concerned that our district has had little to no representation regarding the outcome of the proposed plan. No one on the committee is from north east quadrant of the city where many of the proposed changes are to take place, yet we all pay taxes. That constitutes taxation without representation in my mind. Please explain in detail how this proposed plan is in the best interest of all Moreno Valley residents and specifically what you perceive as beneficial for residents of Sterling Ranch.

The EIR report for WLC charted the effect of the diesel plume and stated that the area of greatest negative impact would be along a 1 mile wide corridor the length of Highway 60 from Theodore Street to somewhere west of Nason Street. Our housing is within that plume. Explain how increasing traffic in the proposed plan will not impact the already devastating effects of our poor air quality. Also, what environmental plans/regulations will be imposed to mitigate the effects of climate change.

The 2006 General Plan protected the large residential lots on the northeast quadrant of the city in order to attract "executive housing". Why has this protection been disregarded in the new plan? This represents a bad faith breach of public trust by elected officials to service outside influence and has not been adequately addressed.

I am strenuously and vigorously opposed to the building of R-10 housing. Infusing huge numbers of residents without adequate infrastructure or employment is irresponsible and is not representative of the premises made to residents living in Sterling Ranch. What possible rationale can be given for such deplorable actions?

Ironwood Avenue from Moreno Beach to Theodore is shattered and broken, not worthy of even a third world country. Explain the short term and long term plan for the only road parallel to Hwy 60. If the explanation includes upgraded pavement to accommodate increased truck traffic then also explain how the city intends to mitigate the dangerous conditions (safety, noise, delayed commuter times, air quality, crime) by such irresponsible actions.

How has Moreno Valley Unified School District been involved while developing this plan? Has the district been provided adequate land for schools? Where and how? Who will pay for these proposed actions?

The sections in the proposed plan off of Hwy 60 at Theodore, Redlands, and Moreno Beach allowing "commercial/freeway businesses" will directly impact residents in the NE section of the city along that corridor. What kind of businesses? Office? Retail? Truck stops? Be specific. Also, what type of lighting will these businesses bring in? The city code currently restricts lighting bleeding onto adjacent properties over a certain candlepower. Who will enforce those restrictions and how responsive will enforcement be with regard to complaints?

Finally, I would like to propose that the corridor along Hwy 60 encompassing Theodore Street east to Nason Street north to Hemlock be designated as a Green Zone public space incorporating native plants and trees with hiking and biking trails. This would act as a sound and pollution buffer from the deleterious effects of traffic, air and noise pollution. Our city already has a paucity of open public parks and wilderness areas. Why not start making up that deficit? Please explain.

Respectfully,  
 David Israel

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- 1 Introductory comment. See responses to specific comments below.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The City has provided opportunities for participation of all residents, including District 2 residents. As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initially, the City "focused on community outreach to identify the most important issues to address within the General Plan and to establish a vision for the future of Moreno Valley. This phase included stakeholder interviews, six 'pop-up' outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members" (page 2-9). The City also formed the General Plan Advisory Committee (GPAC), who "served as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU" (page 2-9).  
  
The City then conducted a second community-wide survey and multiple public meetings, which allowed City staff to explore and refine the pros and cons of six different concepts "with input from the community, GPAC, and Planning Commission. Between December 2019 and May 2020, close to 1,000 community members participated in the 2021 GPU process. In June 2020, the City Council provided input on and concurred with the Preferred Plan Concept, which is now part of the proposed 2021 GPU" (page 2-9).
- 3 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Air quality modeling for the project included the World Logistics Center. Further, the analysis provided is conservative as it does not take into account the recent WLC EIR settlement which includes legally binding requirements to implement a number of additional mitigation measures that would minimize air quality impacts. Measures that would be implemented at WLC would result in lower Citywide air emissions include but are not limited to:

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	<p>3 cont.</p> <ul style="list-style-type: none"><li>• Provide up to 1,000 eBike subsidies in the amount of \$500 to WLC employees who commit to bike to work at least twice per week on average. The subsidies will be phased proportionately with buildout of the first 15 million square feet of the project.</li><li>• Develop and implement program to ensure knowledge of trip reduction measures by project employees.</li><li>• Provide 40% subsidies for bus passes for tenants' employees who commit to bus to work at least twice per week on average.</li><li>• Require tenants to have trip reduction plans to achieve 1.3 average vehicle ridership as a factor of total number of employees (in tenant leases).</li><li>• Require tenants to have a Transportation Management Association to encourage carpooling (in tenant leases).</li><li>• Provide bike lockers for 5% or more of building users within 50 yards of employee building entrances.</li><li>• Fund a zero emission shuttle that circulates within the Specific Plan area and has pickup and drop-offs at the closest off-site bus stop no later than the issuance of a certificate of occupancy for 15 million square feet of warehouse buildings.</li><li>• WLC will provide 1,000 Level 1 chargers in WLC parking lots, phased proportionately with project buildout, and will ensure that they function properly for at least 15 years from their dates of installation.</li><li>• WLC will provide 80 Level 2 chargers in WLC parking lots with two ports per charger (for a total of at least 160 ports), phased proportionately with project buildout, and will ensure that they function properly for at least 15 years from their dates of installation.</li><li>• WLC will install signage at each EV parking space stating that the parking space is for EVs only and improperly parked vehicles will be towed.</li><li>• WLC must construct all warehouse buildings to achieve at least <b>LEED Silver Certification</b> for core and shell. If the WLC seeks to advertise a building as having LEED Silver Certification, it shall apply for certification. If certification is granted, notice shall be provided to Petitioners.</li><li>• Warehouse roof areas not covered by solar panels shall be constructed with materials with an initial installation <b>Solar Reflective Index Value of not less than 39.</b></li></ul>
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LETTER

RESPONSE

	<p>4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City's RHNA allocation in accordance with State Housing laws.</p> <p>5 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. In addition to ongoing City efforts to repair roads, as future development is proposed consistent with the General Plan Update, specific infrastructure needs would be determined as part of a future site-specific discretionary review, including improvements to roadway conditions.</p>
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LETTER

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	<p>6 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The Moreno Valley Unified School District reviewed the Draft EIR and submitted a comment letter, which did not suggest an inadequacy in the analysis of the Draft EIR.</p> <p>7 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with light and glare are presented in Section 4.1 Aesthetics of the Draft EIR.</p> <p>8 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Future park and recreation facilities are described in Section 4.15 Public Services and Recreation of the Draft EIR.</p>
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LETTER

RESPONSE

Letter I-23

From: [Maoya Jiannino](#)  
To: [Chris Ormsby](#)  
Subject: Re: General plan comments  
Date: Wednesday, May 12, 2021 7:33:04 PM  
Attachments: [imaae6904e0.PNG](#)

**Warning: External Email – Watch for Email Red Flags!**

Hi Chris,  
I have some comments on the GPU

Being a resident of Council District 2 I strongly do not believe the GPU should be voted on by the Council until an elected councilperson from District 2 is installed.

Currently there is a recommendation for R10 at Moreno Beach and Ironwood which is surrounded by R2. A transition of R5 would be much better to increase housing in this area.

The circulation plan shows Ironwood as having an 88' ROW. Does that ROW currently exist? What is the plan on construction of a ROW of 88' in the windy area west of Nason?

Which roadways are going to be Designated Truck Routes?

The plan shows traffic on roads that currently do not exist ie Pigeon Pass and Reche Canyon. The City has no control for determining their construction. Can development be restricted until roadways are completed to keep traffic from becoming too congested?

A warehouse at the southeast corner of Heacock and Ironwood is not appropriate with existing traffic and nearby residential properties.

Steve R. Jiannino

-----Original Message-----  
From: Chris Ormsby <[chriso@moval.org](mailto:chriso@moval.org)>  
To: 'Maoya Jiannino' <[jianderosa@aol.com](mailto:jianderosa@aol.com)>  
Sent: Wed, May 5, 2021 8:37 am  
Subject: RE: General plan

Steve,

Our offices are still closed to the public until June 1 so it would be by appointment at this time. If you let me know when you would like to come in, I will coordinate to make sure that we have staff available to help you. The entire document is available online at [www.moval.org/2040](http://www.moval.org/2040). I am also attaching the Executive Summary which is also available in both English and Spanish on the City's website.

Chris

- 1 Introductory comment. See responses to specific comments below.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 3 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 4 This comment does not suggest an inadequacy in the analysis of the Draft EIR. The EIR provides a programmatic analysis of the circulation network and land use plan but is not intended to provide site specific details such as existing right of way widths or construction plans. Future development projects in the area would evaluate the need for improvements under a separate environmental review process.
- 5 The Draft General Plan Circulation Element states, "Truck traffic on City streets is restricted to specific routes that are designated for thru traffic of trucks over three tons; the truck network system is identified in the City's Municipal Code. These truck routes help to facilitate the movement of goods throughout the city, while providing a connection between major highway facilities (i.e., SR-60 and I-215) to local roadways, such as Alessandro Boulevard and Heacock Street. Moreover, truck traffic is restricted to these designated roadways, unless otherwise authorized by the California Vehicle Code, in order to minimize wear and tear on City streets and promote safety on residential streets.
- 6 Future site specific development proposals would be evaluated to determine the need roadway improvement. Future development would include applicable conditions of approval which may include roadway improvements. Congestion is no longer an issue that requires evaluation under CEQA; however, future project specific reviews will be required to ensure consistency with the circulation element plan.
- 7 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Refer to Section 4.16 for a discussion of transportation impacts associated with the land use plan. Future site-specific environmental review would occur for future development that would consider compatibility with adjacent uses including applicability of General Plan policies from the Land Use and Community Character Element.

Chris Ormsby  
Senior Planner  
Community Development  
City of Moreno Valley  
p: 951.413.3229 | e: [chriso@moval.org](mailto:chriso@moval.org) | w: [www.moval.org](http://www.moval.org)  
14177 Frederick St., Moreno Valley, CA 92553



**From:** Manya Jiannino <[jianderosa@aol.com](mailto:jianderosa@aol.com)>  
**Sent:** Tuesday, May 4, 2021 7:23 PM  
**To:** Chris Ormsby <[chriso@moval.org](mailto:chriso@moval.org)>  
**Subject:** General plan

**Warning: External Email – Watch for Email Red Flags!**

Hi Chris, I would like to come in and review the general plan update on Thursday, May 6th. . Do I need an appointment to do that or can I just come in some time in the afternoon?

Thanks Steve Jiannino

Letter I-24

May 17, 2021

Comments on the General Plan Draft EIR

I am very concerned with the proposed rezoning of the northeast corner of Cottonwood and Moreno Beach to R10. This area is currently some flat land that is disc'd for fire prevention clearances, but the majority of this parcel is hillside with native coastal sage vegetation (a fast disappearing native vegetation) and large scenic boulders. It is currently zoned R2 and hillside residential. In the past the city promised to keep hillsides (above 1700 feet) protected and it feels like a promise is being broken. Much of this parcel is at or above 1700 feet. The tallest peak on the east side of Moreno Beach is above 1800 feet. In all alternatives but the no action alternative, it is proposed to change the current zoning of R2 and hillside residential to R10. This is a drastic change from what is in the current general plan and from what we expected when we moved here (we loved the views and the quiet and the nearby natural areas). Does this mean the plan is to bulldoze the entire set of hills (there are 3-4 peaks in this parcel)? That is what the zoning indicates showing the entire parcel including all of the hills zoned as R2 in the future. This will be a very significant impact to the surrounding current residential areas, many of which are R2, and the aesthetics and noise in a broader area. And the change to the views would be over a much larger area. Why was an alternative to this high density housing not included in any action alternative? Why was this high density housing not proposed for some other flat land area rather than these beautiful hillsides that serve many purposes currently (views, noise buffering, wildlife homes and corridors, and a nature experience within our city). We purchased our home where we did because of the views and the plans to keep this hillside as low density housing and the fact that the hills buffer us as well as the valley below (south of the hills) from the freeway corridor noises. These hills are used by many wildlife species such as coyotes, rabbits, reptiles, hawks, turkey vultures, migratory birds, and even golden eagles, and serves as a wildlife corridor through the area from Quincy wash on the east to the larger hills on the west side of Moreno Beach. It is also used for hiking, horseback riding (yes some residents do still have horses in the residential areas south of the freeway and do ride locally), and enjoying nature in the local area. These hills are very scenic and help buffer this valley from the noise from the freeway corridor. If you are not familiar with this area, you should take a look and see the beauty of the area, and sit outside and notice how the hills help buffer the noise, and watch and hear the wildlife using this area.

The draft plan also proposes to widen Moreno Beach to six lanes over Petit Hill (Moreno Beach where it passes south of the Auto Mall area south into a large valley where noises from this road already carry over a large area). I can see the need for adding an extra lane over this hill to accommodate safer bicycle and pedestrian travel and for slow trucks but making this six full travel lanes would be a mistake. The noise would carry much further than the analysis indicates. Just sit outside late at night and hear how far the noise travels already in this area. Making this six lanes would encourage way more speeding and racing cars which is already a huge problem on the east end. It would become almost a freeway through the residential areas on the east end south of the freeway. There is currently little enforcement of the speeding and drifting that occurs at this end of the city especially at night and this would only make it worse. The noise analysis in this draft EIR seems to not represent what is actually heard and how far the sound travels. It appears the current noise levels were monitored from various points in a two day

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- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City's RHNA allocation in accordance with State Housing laws.
- 2 As described in Section 4.1.5.1 of the Draft EIR, all future development and redevelopment would be required to adhere to the proposed goals, policies, and actions included in the Open Space and Resource Conservation Element (OSRC) Element of the 2021 GPU. Goal OSRC-2: seeks to preserve and respect Moreno Valley's unique cultural and scenic resources, recognizing their contribution to local character and sense of place, and includes numerous policies and actions that would help achieve this goal.  
  
The General Plan Update includes increased residential density in order to accommodate the City's RHNA allocation in accordance with State Housing laws. Impacts related to noise are described in Section 4.13 Noise of the Draft EIR.
- 3 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with biological resources are presented in Section 4.4 Biological Resources of the Draft EIR.
- 4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts related to noise are described in Section 4.13 Noise of the Draft EIR.
- 5 The noise measurements summarized in Table 4.13-2 of the Draft EIR were conducted to characterize the variability of noise in the planning area, however, the analysis of potential traffic noise impacts was based on existing and future traffic volumes that take into the width of the roadway, speed, and truck mixes for each roadway segment in the study area. Thus, the analysis takes into account the widening of Moreno Beach Drive, as well as the existing and future truck traffic. The noise contours shown in Figures 4.13-2 and 4.13-4 are conservative since they do not take into account any shielding provided by buildings. Comments regarding speeding and drifting do not suggest an inadequacy in the analysis of the Draft EIR.

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period on two December days which hardly represents a broad range of what already occurs. And the analysis of what would occur shows very short distances for noise to travel, which is not what actually occurs depending on the day and the weather. We can often hear trucks rumbling up and down the hill and speeding cars from inside our home currently and the noise of a six lane "highway" over the hill would increase it significantly, and not just for us but for a large area of this valley south of the hills.

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Cont.

Please take a re-look at the proposal to rezone the northeast corner of Cottonwood and Moreno Beach to R10 and to widen Moreno Beach to six lanes over Petit Hill area. A lesser impacting alternative should be considered and analyzed before this analysis is accepted by the city, not just one alternative for this parcel over all of the action alternatives.

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Again, I am also concerned that this process is moving forward so quickly during a pandemic where people were not able or knew how to engage in the process, as the pandemic hit during the last public hearings. Few if any press releases were sent out about the steps in the process during the pandemic. Documents were not readily available for review during the process over the past year. And little info has been shared widely about how people can re-engage with the city in this process. This should be a plan for the entire community and not just a few.

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Melody Lardner  
28201 War Admiral St.  
Moreno Valley, CA 92555

6 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

7 As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initial outreach included stakeholder interviews, six 'pop-up' outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members (Draft EIR page 2-9). The City formed the General Plan Advisory Committee (GPAC), as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU. Additional community-wide surveys and multiple public meetings were held between December 2019 and May 2020, with close to 1,000 community members participating in the 2021 GPU process. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

Letter I-25

From: STELLA  
To: Chris Ormsby  
Subject: Sterling Ranch Land Use map  
Date: Thursday, April 22, 2021 12:22:39 PM

Warning: External Email – Watch for Email Red Flags!

Dear Chris,  
I moved to Moreno Valley for the life it provides myself and my family. We enjoy the quietness of where we live. We are on the out skirts of Moreno Valley and we are happy to be out here.  
We live in the Sterling Ranch homes off of Moreno Beach drive and Ironwood. It is a nice and quiet life. We have enjoyed the increase in property values.  
It have come to our attention that some Land Use Changes are being proposed in 2021, which is a changed to the Land Use Map of 2006.  
This is in bad faith of our 2006 Land Use Map.  
The current Land Use is zoned R-2 along both sides of Moreno Beach to Ironwood. I know you are aware. How can you change the flow of this neighborhood? 2 houses per acre, this is the flow of this side of Moreno Valley. The proposed changes are for 10 houses per acre? Very crowded and a big change to the R-2 that was zoned for this area. A commercial area with operation 24 hours a day? I did not move into a commercial area as my neighbors did not. We have commercial 2 minutes away in a car right on the other side of the freeway with the 24 Arco Mart, Del Taco, Carl's Jr. etc.....24 hour Walmart. To mirror this on the other side of the freeway, our side will cut into their profits and then what? We have closed stores/fast-food stops? We have enough empty buildings in Moreno Valley. Let's build them up, before we add more empty buildings that we cannot fill.  
The Northeast end of Moreno Valley need to remain as is partially a ranch. People enjoy horses, sheep and other animals not allowed in homes that sit on land that is smaller than a half acre. how long before people living in smaller homes and businesses complain of the smell of animals and then our zoned houses have to change all the way to Locust Ave?  
Please allow Sterling Ranch development to remain R-2 and all four corners that cross Moreno Beach Drive and Ironwood. It Flows easily. Do not disrupt with commercial zoning that will just lead to empty buildings or businesses that barely make a profit and do not maintain with the upkeep of the outside of their buildings.  
This area does not need businesses that operated 24 hours a day, this only leads to crime.

Sincerely,  
Stella Locke



- 1 Introductory comment. See responses to specific comments below.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City's RHNA allocation in accordance with State Housing laws.
- 3 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 4 This comment does not suggest an inadequacy in the analysis of the Draft EIR. Please refer to Section 4.2.5.5 of the Draft EIR which addresses changes to the existing environment that could result in conversion of farmland, specifically within this area north of SR-60.
- 5 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

Letter I-26

**From:** [STELLA](#)  
**To:** [Chris Ormsby](#)  
**Subject:** Sterling Ranch  
**Date:** Friday, April 23, 2021 10:10:24 AM

**Warning: External Email – Watch for Email Red Flags!**

Dear Chris,  
Sterling Ranch needs to continue to be zoned R-2.  
The 2006 current land use is what people living in Sterling Ranch used to buy their homes. It is not fair to change the Land Use now. We don't need more empty buildings.

Stella

1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.



LETTER

RESPONSE

Letter I-27

**From:** [STELLA](#)  
**To:** [Chris Ormsby](#)  
**Subject:** Sterling Ranch  
**Date:** Tuesday, April 27, 2021 12:55:29 PM

**Warning: External Email – Watch for Email Red Flags!**

Dear Chris,  
I was driving around our neighborhood and even further in the city. We need our infrastructure fixed first. Our streets are horrid. Moreno Beach drive and Redlands blvd. Fur street is outrageous crazy needs fixing, I see all the bubble gum fixing, we need long turn repair. Elder is so much in need of repair from Nason to Perris blvd. Just a thought.

Stella

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. In addition to ongoing City efforts to repair roads, as future development is proposed consistent with the General Plan Update, specific infrastructure needs would be determined as part of a future site-specific discretionary review, including improvements to roadway conditions.

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Letter I-28

From: [STELLA](#)  
To: [Chris Ormsby](#)  
Subject: Sterling Ranch  
Date: Sunday, May 2, 2021 11:20:42 AM

Warning: External Email – Watch for Email Red Flags!

Chris,  
Think about fixing the roads first. The traffic will increase. We picked the country feel and moved here for that reason. We want to keep it that way. To put houses in that area off of two main streets Moreno Beach Drive and Ironwood is just asking for accidents. Ten houses on one acre is ridiculous. I remember moving here looking at houses and seeing the ones where it looks like you can hand out your window and hold your neighbors hand when they are hanging out their window. As I come up with more reasons not to change the Land Use, I will write you.

Sincerely,

Stella

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. As future development is proposed, specific infrastructure needs would be determined as part of a future site-specific discretionary review, including improvements to roadway conditions. Impacts associated with transportation are presented in Section 4.16 Transportation of the Draft EIR.

Letter I-29

From: Joe Lockhart  
To: Chris Ormsby  
Subject: Revised commentary Regarding Zone changes in NE Moreno Valley  
Date: Sunday, May 16, 2021 12:12:54 PM

Warning: External Email – Watch for Email Red Flags!

Attn: Chris Ormsby, AICP, Senior Planner  
Community Development Dept. City of Moreno Valley, Ca.  
Joe Lockhart  
, Moreno Valley, Ca. 92555  
5/15/2021

**RE: MoVal 2040 – General Plan- Lot Zoning**

Dear Mr. Ormsby,

Pursuant to the proposed zone changes under plan MoVal 2040 affecting the north east area of Ironwood and Moreno Beach Drive. I am demanding that this zone change be rejected totally from this or any other non-citizen generated changes in this quadrant of the city.

I moved here in 1990 to an area of new homes with 1/2 acre minimum lots, with the knowledge that this area was zoned for the same or larger lots. As with older homes surrounding this and adjacent sections of the City, I was comfortable with the idea that I would not be overrun with homes of smaller design lots where neighbors can view your property and windows. Where I could raise my new family in the environment that was close to my goals.

The proposed 10 per acre zone change is not designed to protect property owners' rights. It seems that there are other mitigating factors that are in play here.

What would inspire this Council to even consider allowing builders to steal a lifestyle that many in my community have selected and where homes on larger lots are at a premium? That is easy, Money and greed. Why would the Council think that jamming these little lots (1/10 of or less) next to established communities such as our tract and the one across from Calvary Chapel and eventually doing the same thing at other areas in this section of the City? Money and greed. The community just South of the Target center is of similar size, where, to exit or enter your garage you must share a common driveway and if a neighbor is leaving their garage you must wait for them to leave to enter yours. These clustered up homes are fine for those who desire that type of living, but again, we, in these potentially affected communities, did not and do not want that lifestyle.

Being the highest property in my community, I have had excellent views of the San Jacinto Valley destroyed by the overindulgence of warehouses (commonly and fancily disguised as Logistics Centers).

Changing adjacent lot sizes will give me a wonderful view of two-story structures with zero valley views and provide a peeping Toms view from their windows of my property, pool, and family. Trust me, I have seen this way too many times. As a home inspector and contractor, I have, on many occasions, viewed the back yards of up to 13 homes. Including their slider doors, trash, pools, pets and even their kids playing, from a window of the second floor of the home I was in. That is not what any of my neighbors want -period.

- 1 Comment noted. The City notes that zoning changes are proposed for review and action simultaneously with the General Plan Update project. The Municipal Code Zoning Ordinance Amendment generally includes only changes required to make the zoning ordinance consistent with the General Plan update. . This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

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Look, it does not take a lot of common sense and a fair amount of history to know that this proposed change is designed to cater to landowners who are dying to sell their land at top dollar. And, just like the wolves in sheep's clothing that tried to alter zoning at the meadow at the North side of Ironwood and West of Moreno Beach Drive and East of Nason St. who had zero intention of building homes. Their objective was to get the zone changed to resell the changed lots size to the highest bidder. Nice try, but we the people prevailed.

Being a licensed contractor as well and having extensive experience in construction, I know that builders want to build as many homes on a plot of land as possible, not for good of the community but to make as much profit as possible. Every time that zone changes allow for smaller lot size, the builders and investors are ecstatic. Build the homes, get their money and head to the next project. I know this all too well as I worked tracts for several years. Where is the next job boss?

To add, we see so many large two-story homes with postage stamp lots all over. The truth is, it costs far less to build a two-story home than a one-story home. Who does this benefit? The builders and tax revenue to the City County and State. The claim that these homes meet efficiency values is another misnomer. Many of these homes have two HVAC systems that in themselves are rated as efficient but when combined with a second unit, trying to combat the heat stack effect does not equate to efficiency and all the while generating more taxes on utilities.

As Moreno Valley and most Cities collect taxes on every utility, I can see why more homes, apartments and condos cause Cities to drool.

I vehemently oppose altering the zoning that has been in place for decades, and on what we the citizens of the affected area purchased our homes. Changing zoning here will create legal action and wasted time and money, stress, and frustration for the citizens. This city will try and fight using our tax dollars, not theirs, without ever feeling the emotional and financial distress this can cause on the citizens.

This Council does not speak for the citizens. They work for the citizens and we demand no approval of lot size changes in this area.

I could not tell you who the council person is in my area as I have had zero contact with him or her. As I am in the direct sphere of influence, why wasn't I contacted by this councilperson?

With respect to this city and its residents please show your support to deny any further changes to 1/2 acre or larger zoned areas.

Sincerely,

Joe Lockhart

Please enter this commentary into the Public Record.

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3 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

5 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. All comments will be provide to decision makers for consideration

LETTER

RESPONSE

Letter I-30

From: [maddy\\_lopez](#)  
To: [Chris Ormsby](#)  
Date: Sunday, May 16, 2021 9:48:31 AM

**Warning: External Email – Watch for Email Red Flags!**

The people don't want iddos truck stop. Stay with the 2006 plan. I'm so sick of iddo buying seats and ruining this town. I've lived here for 50 years. I hate how this town was ruined.

Sent from my Verizon, Samsung Galaxy smartphone

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

Letter I-31

From: ANGEL LOPEZ  
To: Chris Ormsby  
Cc: Dr. Yashan A. Gutierrez; Victoria Pico; David Marquez; Ulises Cabrera  
Subject: Public Hearing - MoVal 2040 (General Plan Update, Climate Action Plan, and Environmental Impact Report)  
Date: Sunday, May 16, 2021 9:10:09 PM

**Warning: External Email – Watch for Email Red Flags!**

Good evening Mr. Ormsby and Council Members,

Please accept my correspondence in opposition to the proposed general plan update and draft EIR and request my comments be entered into the public record. The significant negative impacts to my neighborhood would be extreme and not mitigated which will damage my health and quality of life. My spouse and numerous constituents would most be negatively impacted due to asthma related symptoms. It is vital to maintain our community character and we add to the diversity of housing that was ignored in the new plan. Within the draft EIR, CEQA identified two alternatives that protect the NE end of Moreno Valley, 6.4 Reduced Growth Alternative and 6.5 Redistributed Growth Alternative which has been identified as 6.6 Environmentally Superior Alternative. These alternatives retain our 2006 general plan land uses in the NE and are the best courses of actions.

It is my understanding that when the COVID pandemic hit, constituents requested the general plan update be postponed until the public could fully participate at ALL committee meetings in an open, and transparent manner. Comments have surfaced these voices were denied.

My sincere request is to make available to the public, all Committee meeting minutes, comments by constituents have surfaced there aren't any available. Clearly the committee was meeting as the final proposal suddenly has R10 housing in the NE area. Further, to my understanding there was editing/censoring of comments in opposition which violates due process clauses from the U.S. Constitution and violates the First Amendment. Comments from constituents have surfaced alleging public participation aspect from handpicked comments that agreed with what special interests wanted. Further, when questions rose from constituents in opposition, they went unanswered.

Mayor Gutierrez, with prejudice, handpicked, biased general plan update committee members. Two large donors in Iddo Benzeevi (Warehouses), and Nelson Chung (Pacific Communities). Further acting with bias, handpicking three planning commissioners (Joann Stephens, Alvin DeJohnette, Ray Baker) and an MVC representative (Carlos Lopez). All biased and loyal followers of Mayor Gutierrez and Benzeevi.

More comments have surfaced from constituents in the NE area requesting the Mayor appoint a representative resident of the NE to protect "their" interests. That request to my understanding, was denied.

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1 Comment noted. While the comment expresses that impacts of the plan would be extreme and not mitigated, the comment does not provide a specific comment or concern about the content of the Draft EIR. Impacts to health related to air quality are addressed in the Air Quality section of the EIR, Section 4.3.5.3.

2 All comments will be provided to the decision makers for consideration. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

3 As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initial outreach included stakeholder interviews, six 'pop-up' outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members (Draft EIR page 2-9). The City formed the General Plan Advisory Committee (GPAC), as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU. Additional community-wide surveys and multiple public meetings were held between December 2019 and May 2020, with close to 1,000 community members participating in the 2021 GPU process. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

5 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

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At present time, with the untimely death of our Councilmember, and bless her soul, Dr. Carla Thornton. Constituents that shall be impacted the most by the proposed general plan update and draft EIR, have not had proper representation to voice opposition to a process that was conducted with prejudice.

In doing so, The City of Moreno Valley has failed to properly inform the public and denied due process for full participation.

Yours,

Angel Lopez-Ramirez  
Moreno Valley Homeowner in District 2

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Cont.

Letter I-32

Rachel Mansfield-Howlett  
Attorney at Law  
[Rhowlettlaw@gmail.com](mailto:Rhowlettlaw@gmail.com)  
707-291-6585

May 17, 2021

To: Chris Ormsby  
[chriso@moval.org](mailto:chriso@moval.org)  
Senior Planner  
Community Development  
City of Moreno Valley

Re: Comments on the Draft EIR for “MoVal 2040” – Moreno Valley  
Comprehensive General Plan Update, Housing Element Update, and Climate  
Action Plan, SCH # 2020039022

Dear Chris Ormsby:

On behalf of the unincorporated public benefit group, Concerned Residents of NE Moreno Valley, thank you for the opportunity to comment on the program-level Draft EIR (“DEIR”, hereafter) prepared for the Moreno Valley General Plan Update, Housing Element, and Climate Action Plan (“Project”, hereafter).

Concerned Residents live on the northeast end of Moreno Valley, which is a unique area of the City zoned for large lots and animal keeping. The last general plan prepared in 2006 purported to be the final build out plan; it provided protections to the semi-rural character of the area, valued night skies, and restricted noise. Concerned Residents who are affected by the new plan believe that the 2006 general plan is still the proper plan for their area especially considering the current overdevelopment that has occurred south of SR 60, which has been overrun by warehouses and 24/7 noise.

As the City is aware, the previous 2006 General Plan (GP) restricted office use to the areas adjacent to SR 60 which protected residents from impacts which occur outside of regular business hours. The proposed update rezones the area to commercial with buildings up to 30’ high (and more) with 24/7 use, and extends the commercial area further north than previously allowed. This proposal will surround a semi-rural well-established neighborhood on three sides and expose residents to 24/7 environmental impacts. It also appears to rezone homes on Redlands Blvd. to commercial. While the City has purported that expansion plans include commercial uses other than warehouse use, the area does not appear amenable to such development and seems primed for more warehouse use.

1 Introductory Comment noted.

2 Comment noted. The Draft EIR includes analysis of all applicable environmental issues and identifies all of the applicable General Plan policies that would support land use compatibility and reduction of impacts. Where appropriate mitigation measures have been identified that provide a framework for future site specific analysis of individual development projects that may be proposed in the future. The comment does not identify detail about recommended mitigations or raise a specific issue regarding the content of the Draft EIR; therefore, a more detailed response is not provided.



The other major detrimental effect is the proposed change of zoning to a large area of the City, from R2 to R10 (two homes per acre to 10 homes per acre). This alteration will completely change the community character of the residential neighborhoods north of SR 60 and opens the flood gates to rezoning all the remaining large-lot and animal keeping land to higher density. This change represents numerous inconsistencies with the goals set forth and embodied in the previous General Plan. In order to represent an adequate informational document, inconsistencies must be discussed and appropriate mitigation or alternatives be considered.

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The current proposal removes protections for retention of neighborhood community character, loss of large lots (which are used to accommodate agricultural uses and animal keeping) and fails to provide sufficient night sky analysis or protections, among other concerns, discussed herein. The DEIR consequently fails to propose adequate mitigation to ensure impacts are reduced to the greatest degree feasible. It is imperative that the City conducts a fair analysis of all environmental impacts, considers appropriate mitigation to substantially lessen those impacts, and also reviews alternatives that avoid or substantially lessen environmental impacts.

The DEIR states “[e]nvironmental impacts classified as significant and unavoidable have been identified in the resource topics of Agricultural Resources, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Noise, and Transportation, which may be controversial to the general public, agencies, or stakeholders.” (DEIR pg. 5-4.)

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3 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

The DEIR only considered two alternatives to the Project aside from the required No Project alternative, a Reduced Growth Alternative and a Redistributed Growth Alternative. The Redistributed Growth Alternative is described in the DEIR as:

The Redistributed Growth Alternative would result in the same level of growth as the proposed plan, but would redistribute growth from the proposed Community Corridor Concept Areas to the Downtown Center Concept Area (see Figure 6-2). This alternative would reduce the maximum permitted density and intensity in the Community Corridor Concept Areas, thereby reducing future development proposed along Sunnymead Boulevard, Alessandro Boulevard, Perris Boulevard, and Heacock Street by approximately 10 to 15 percent compared to the project. The reduced growth capacity from these areas would be redistributed to the Downtown Center Concept Area. This alternative would also remove a portion of the proposed Highway Office/Commercial Concept Area located north of SR-60 with the existing office and residential land use

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4 This comment cites both text from the EIR and CEQA Guidelines and Statute and recommends adoption of the redistributed growth alternative. The City has prepared the necessary CEQA findings to adopt a project with significant and unavoidable impacts. Required CEQA Findings will be available to the public as part of the public hearing documents.

designations from the existing 2006 General Plan being retained. Redistribution of land uses associated with this alternative would not alter the total amount of residential, commercial, and office land uses compared to the Project.

The DEIR determined that the Redistributed Growth Alternative is the environmentally superior alternative because it would reduce significant impacts associated with air quality, agricultural resources, biological resources, noise, and transportation but stated this alternative would not achieve the same level of housing as the Project. The DEIR stated:

Although impacts related to cultural and tribal cultural resources would remain the same as this project, this alternative would reduce most significant impacts, but not to below a level of significance, while still meeting most objectives of the project. However, land within the Downtown Center is not housing ready, and would take more time and investment to accommodate housing units needed to achieve the City's Regional Housing Needs Allocation (RHNA) targets compared to what could be achieved along the Community Corridors proposed under the project.

Concerned Residents encourage the City to retain the 2006 General Plan provisions for the area north of the 60 freeway. Citizens support the adoption of the Redistributed Growth Alternative, which retains the provisions of the 2006 GP for these areas. The reasoning for the adoption of mitigation and alternatives when projects are proposed that contain admitted impacts is as follows:

"CEQA does not authorize an agency to proceed with a project that will have significant, unmitigated effects on the environment, based simply on a weighing of those effects against the project's benefits, unless the measures necessary to mitigate those effects are truly infeasible." (*City of Marina, supra*, 39 Cal.4th 341, 368, citing *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.)

Significantly, if a project will result in significant environmental impacts that will not be avoided or substantially lessened by mitigation measures, the agency must consider the environmentally superior alternatives identified in the EIR and find that they are "infeasible" before approving the project. (Pub. Res. Code § 21081(a)(3), *see also* CEQA Guidelines 14 Cal. Code Regs. § 15091(a)(3).) Feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. (Pub. Res.

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Code § 21061.1; Guidelines § 15364.) The requirement for an infeasibility finding flows from the public policy that states:

It is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects ... the Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

(Pub. Res. Code § 21002.) Reflecting this policy, Public Resources Code sections 21081(a)(1)–(3) provide that if one or more significant impacts will not be avoided or substantially lessened by adopting mitigation measures, alternatives described in the EIR that can avoid or reduce the impact must be found infeasible if they are not adopted.

Under this scheme, a public agency must avoid or reduce a project's significant environmental effects when it is feasible to do so. (Pub. Res. Code §§ 21002, 21002.1(b); 14 Cal. Code Regs §§ 15021(a) and 15091(a)(1).) As explained by the California Supreme Court in *Mountain Lion Foundation v. Fish & Game Commission* (1997) 16 Cal.4<sup>th</sup> 105, 124, "Under CEQA, a public agency must ... consider measures that might mitigate a project's adverse environmental impact and adopt them if feasible. (Pub. Res. Code §§ 21002, 21081)." The Court reiterated "CEQA's substantive mandate that public agencies refrain from approving projects for which there are feasible alternatives or mitigation measures." (*Id.* at 134.) CEQA's substantive mandate was again underscored by the California Supreme Court in *Vineyard Area Citizens, supra*, 40 Cal.4<sup>th</sup> 412; *City of Marina, supra*, 39 Cal.4<sup>th</sup> 341, by the Court of Appeal in *County of San Diego v. Grossmont-Cuyamaca Community College District* (2006) 141 Cal.App.4<sup>th</sup> 86 and *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4<sup>th</sup> 1336.

Increased costs of an alternative do not equate to economic infeasibility: "[t]he fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project." (*Citizens of Goleta Valley v. Board of Supervisors (Goleta I)* (1988) 197 Cal.App.3d 1167, 1181 [the record included no analysis of the comparative costs, profits, or economic benefits of scaled down project alternative and was insufficient to support finding of economic

infeasibility); *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4<sup>th</sup> 587 [project applicant's preference against an alternative does not render it infeasible]; *County of San Diego, supra*, 141 Cal.App.4<sup>th</sup> 86, 108 [community college's proportional share of cost of off-campus traffic mitigation measures could not be found economically infeasible in absence of cost estimates]; *Burger v. County of Mendocino* (1975) 45 Cal.App.3d 322 [an infeasibility finding based on economic factors cannot be made without estimate of income or expenditures to support conclusion that reduction of motel project or relocation of some units would make project unprofitable]; see also *Kings County Farm Bureau, supra*, 221 Cal.App.3d 692, 736.)

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Here, the DEIR admits that the alternative would achieve *most project objectives while substantially lessening impacts* but claims that the alternative should be rejected due to greater costs and because the alternative would not result in as much housing as the Project. As stated, there is no requirement for an alternative to match every aspect of a project, otherwise there wouldn't be much point in CEQA's substantive requirement that feasible alternatives be considered and adopted. In order to make a finding of infeasibility based on economic factors, the City would need to support this allegation with a study that finds increased costs are sufficiently severe as to render it impractical to proceed with the project. There is also no requirement that mitigation or alternatives reduce an impact to zero.

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Furthermore, the DEIR claims that the downtown center is not housing ready even though the NE R10 is not housing ready either and will also require a lot of expense and time to make it housing ready. A sewer would need to be brought over from the south side because the area is completely on septic systems, and there is a huge natural drainage area and earthquake fault that would complicate implementation of housing.

The DEIR lists significant environmental impacts to Agricultural Resources but opines that retention of agricultural lands need not be considered. This is incorrect under CEQA; the City must attempt to mitigate every impact listed in the DEIR. This is the whole point of environmental review, to divulge a project's impacts before its adoption and to propose alternatives and/or mitigation that reduce those impacts to the greatest degree feasible.

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1. Doesn't the Project also contribute to the cumulative loss of agricultural land?
2. What other past, present, or future probable projects in the area also contribute to

5 The comment incorrectly cites cost as a reason for rejecting the redistributed growth alternative. Cost is not referenced as a reason for rejecting the redistributed growth alternative. The EIR explains that residential density along community corridors is more likely to be developed within the Housing Element planning horizon compared to the Downtown Center due to the fact that the Downtown area includes a Specific Plan to be developed. The City is required to not only accommodate housing through its plan, but it must demonstrate housing development is being achieved within each housing planning cycle, which will be more feasible within the corridors than Downtown.

6 The Draft EIR conservatively concluded that impacts to agricultural resources would be less than significant, despite the fact that the existing General Plan and its prior EIR already acknowledged that agriculture in the City is considered an interim use until land uses are built out (see EIR section 4.2.5.1). The EIR analysis is cumulative by nature as it considers build out of the General Plan, recently approved projects and pipeline projects. The City notes that a majority of the large lots north of SR-60 would be retained consistent with existing land use designations which could continue to support agricultural land uses.

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RESPONSE

the collective loss of agricultural land and open space?

3. Doesn't the retention of large lots foster the retention of agricultural uses and serve as mitigation for this impact?

4. Many areas of the City will be converted to commercial use under this plan, how will truck traffic be mitigated going forward?

5. Truck routes need to be established so that neighborhoods remain intact and are not inundated with pollution and noise. What mitigation can be put in place that alleviates neighborhoods from unnecessary commercial intrusion, including truck traffic?

6. What restrictions are in place to prevent the overdevelopment of warehouses similar to those south of SR 60 that operate 24/7?

7. The DEIR claims that no mitigation is possible for significant traffic noise to sensitive residential receptors. Wouldn't the adoption of either the Reduced Growth Alternative or the Redistributed Growth Alternative completely avoid noise impacts to the area north of SR 60?

8. What other noise restrictions can be imposed?

Regarding Transportation impacts, the DEIR states:

Compared to the existing 2006 General Plan, implementation of the project would result in lower VMT using several metrics, demonstrating a land use plan that would increase per capita VMT efficiency. However, some metrics showed an increase in VMT based on several metrics (shown in bold in Table 4.16-5). As a result of some metrics that exceeded the significance criteria based on certain analysis methodology, impacts would be significant. The project includes TDM goals, policies, and actions that would support VMT reductions; however, anticipated VMT reductions associated with proposed TDM measures would be large enough to guarantee that significant impacts could be fully mitigated. Therefore, projected VMT generated under buildout of the project would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This would be considered a significant impact.

There appears to be an error in this paragraph. In order to make sense, it should read: "VMT reductions associated with proposed TDM measures

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7 The General Plan includes policy EJ.1-9, to "Designate truck routes that avoid sensitive land uses, where feasible." Truck routes are regulated by the Municipal Code. As detailed in the Draft General Plan Circulation Element, "Truck traffic on City streets is restricted to specific routes that are designated for thru traffic of trucks over three tons; the truck network system is identified in the City's Municipal Code. These truck routes help to facilitate the movement of goods throughout the city, while providing a connection between major highway facilities (i.e., SR-60 and I-215) to local roadways, such as Alessandro Boulevard and Heacock Street. Moreover, truck traffic is restricted to these designated roadways, unless otherwise authorized by the California Vehicle Code, in order to minimize wear and tear on City streets and promote safety on residential streets." This comment does not raise an issue regarding the adequacy of the EIR.

8 The General Plan land use plan and policies would be the mechanism to define allowable land uses. This comment does not raise an issue regarding the adequacy of the EIR.

9 This comment does not raise an issue regarding the adequacy of the EIR. The increase in ambient noise levels adjacent to the roadway segments are identified in Section 4.13.5.1 of the EIR. For existing noise sensitive land uses, possible noise-reduction measures would include retrofitting older structures with acoustically rated windows and doors featuring higher Sound Transmission Class ratings, which is a measure of exterior noise reduction performance. However, there is no mechanism in place for implementing such a retrofit program. Because the significant noise impacts would be to existing homes and other noise-sensitive uses in an already urbanized area, there is no feasible mitigation and the EIR concluded that impacts would be significant and unavoidable. The Reduced Growth Alternative and the Redistributed Growth Alternative would both reduce VMT when compared to the proposed project, and would therefore incrementally reduce overall traffic noise when compared to the proposed project, however, not to the degree that would completely avoid ambient noise impacts. It is also noted in the EIR that even without adoption of the 2021 GPU, a significant increase in ambient noise levels would also occur with buildout of the currently adopted land use plan. This is due to the overall increase in growth in the region.

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	<p>9 cont.</p> <p>The comment asks what over noise restrictions can be imposed. The City regulates noise through the Municipal Code under Title 11 Peace, Morals and Safety, Chapter 11.80, Noise Regulation. The applicable noise level limits promulgated by the Municipal Code are summarized in Tables 4.13-6, 4.13-7, and 4.13-8 of the EIR. These limits apply to on-site sources of noise generated at various land uses, including commercial and industrial developments. The Municipal Code also provides noise restrictions on construction activities. Noise within the City would be reduced through enforcement of the Noise Regulation of the Municipal Code and 2021 GPU policies and actions.</p> <p>10 Comment noted. The error in the EIR has been corrected and is included in an EIR errata.</p>
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LETTER

RESPONSE

would [NOT] be large enough to guarantee that significant impacts could be fully mitigated.

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- 9. Wouldn't the adoption of either the Reduced Growth Alternative or the Redistributed Growth Alternative reduce VMT impacts?

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The DEIR claims that impacts due to increased GHG emissions are insignificant. This claim appears to rely on the same discounted methodology used for the EIR prepared for the World Logistics Center, as pointed out in California Attorney General, Xavier Becerra's comment letter for the WLC EIR (see attached 5/14/2020 letter). He stated:

Cap-and-Trade does not and CARB plainly never intended Cap-and-Trade to obviate CEQA mitigation requirements; that is a much bigger change that CARB would have expressly addressed had that been the intent. While the FEIR points out selected Scoping Plan provisions (FEIR at 25), it conveniently omits the directly applicable "Climate Action through Local Planning and Permitting" chapter describing how CARB relies on complimentary local planning actions (including robust CEQA analysis and mitigation) to accomplish the state's GHG mandates and goals. (See 2017 Scoping Plan at 99-102.) The City's approach would effectively render superfluous the CEQA mitigation recommendations in CARB's Scoping Plan, as there would be essentially nothing left to mitigate if agencies took the City's approach.

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- 10. Doesn't the DEIR rely on the same faulty methodology to avoid formulating specific local mitigations for GHG emissions?
- 11. If not, how does the methodology differ in this DEIR?
- 12. Wouldn't the adoption of the Reduced Growth Alternative or the Redistributed Growth Alternative result in fewer GHG emissions? How much?

Thank you,



Rachel Mansfield-Howlett

Attorney for Concerned Residents of NE Moreno Valley

- 11 As detailed in Section 6.0 of the EIR, VMT impacts associated with the Reduced Growth Alternative and the Redistributed Growth Alternative would slightly reduce VMT impacts, but impacts would remain significant and unavoidable.

- 12 The CAP and the EIR does not rely on Cap and Trade. The project includes a Climate Action Plan that demonstrates how the City would achieve GHG reductions in line with state goals as outlined in CARB's 2017 Scoping Plan. Based on the reductions identified through emissions modeling, implementation of the CAP was found to reduce the projects GHG emissions to less than significant. Additionally, future projects in the City would be required to demonstrate consistency with GHG policies and actions. Implementation of the Reduced Growth Alternative and the Redistributed Growth Alternative would slightly reduce GHG emissions. Emission reductions were not quantified for alternatives, as the level of analysis of alternative is not required to be at the same level of detail as the proposed project.

XAVIER BECERRA  
Attorney General

State of California  
DEPARTMENT OF JUSTICE



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May 14, 2020

VIA E-MAIL ONLY

Julia Descoteaux, Associate Planner  
City of Moreno Valley  
14177 Frederick Street  
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Moreno Valley, California 92552  
Phone: (951) 413-3209  
Email: [mljad@moval.org](mailto:mljad@moval.org)

RE: **World Logistics Center Revised Final Environmental Impact Report  
(SCH # 2012021045)**

Dear Ms. Descoteaux:

Attorney General Xavier Becerra, in his independent capacity,<sup>1</sup> and the California Air Resources Board (CARB) jointly submit the following comments on the April 2020 Final Environmental Impact Report (FEIR) prepared for the World Logistics Center (the Project) in advance of the Project's May 14, 2020 Moreno Valley (City) Planning Commission hearing.

The Attorney General and CARB have the following concerns regarding the FEIR, as explained in detail below:

1. The FEIR does not correct the improper GHG analysis the Attorney General and CARB critiqued in multiple comment letters on prior versions of the Project's environmental impact report.<sup>2</sup>

<sup>1</sup> The Attorney General's Office submits these comments pursuant to his independent power and duty to protect the environment and natural resources of the State from pollution, impairment, or destruction, and in furtherance of the public interest. (See Cal. Const., art. V, § 13; Gov. Code, §§ 12511, 12600-12612; *D'Amico v. Bd. of Medical Examiners* (1974) 11 Cal.3d 1, 14-15.) This letter is not intended, and should not be construed, as an exhaustive discussion of the FEIR's compliance with the California Environmental Quality Act (CEQA).

<sup>2</sup> The Attorney General and CARB previously reviewed the City's July 2018 Revised Final Environmental Impact Report (RFEIR) and submitted comments regarding the RFEIR on September 7, 2018. As noted in those comment letters, the RFEIR's analysis of greenhouse gas (GHG) related impacts does not meet CEQA's requirements. On January 30, 2020, CARB also



Ms. Descoteaux  
 May 14, 2020  
 Page 2

2. The FEIR also continues to misrepresent CARB's positions.
3. The FEIR's new GHG Mitigation Measure 4.7.7.1 is inadequate.
4. The FEIR fails to adopt feasible mitigation measures that would substantially lessen the Project's significant adverse effects.
5. The addition of Mitigation Measure 4.7.7.1 is "significant information" that requires recirculation of the FEIR.

Until these shortcomings are corrected, the FEIR should not be certified by the City.

**I. THE FEIR CONTINUES TO RELY ON ENVIRONMENTALLY IRRESPONSIBLE AND LEGALLY FLAWED ARGUMENTS TO AVOID PROPERLY ANALYZING AND MITIGATING THE PROJECT'S ENORMOUS GREENHOUSE GAS IMPACTS.**

Under CEQA, a project's significant GHG impacts must be disclosed and mitigated to the extent feasible whenever the lead agency determines that the project contributes to a significant, cumulative climate change impact. 14 Cal. Code Regs. (CEQA Guidelines) § 15064.4. Yet, the FEIR continues to improperly divide the Project's GHG emissions into two categories, which it terms "capped" and "uncapped", classifications that are created by the FEIR and have no relevance under CEQA. The FEIR asserts that "capped" emissions are "covered" by CARB's Cap-and-Trade Program, and therefore claims that they are exempt from any further CEQA analysis or mitigation.<sup>3</sup>

To purportedly support its improper approach to GHG analysis and mitigation, the FEIR relies on a few weak, misguided bases: (1) two mitigated negative declarations (MND); (2) an outdated guidance document from an air district with no jurisdiction in the South Coast Air Basin; (3) an inapposite appellate court decision that did not benefit from the input of California's expert agencies and other key stakeholders, and (4) unsupported arguments about indirect costs.

The FEIR does not, and cannot, explain why its GHG analysis and mitigation approach did not comply with the CEQA Guidelines, applicable case law, and other relevant guidance regarding GHG analysis and mitigation. In addition, the FEIR ignores the objections in our previous comment letters.

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filed comments on the Draft Recirculated Revised Sections of the Final Environmental Impact Report (RRSFEIR). These three comment letters are attached to this letter as Exhibits A-C. Further, the Attorney General and CARB's amicus brief in *Paulek et al. v. Moreno Valley Community Services District et al.* (E071184) (*Paulek*), which further discusses the legal inadequacies of the GHG analysis, is attached hereto as Exhibit D.

<sup>3</sup> Though Mitigation Measure 4.7.7.1 agrees to offset "capped" emissions in the event the City's GHG analysis is invalidated in *Paulek*, the improper legal arguments regarding the distinction between "capped" and "uncapped" emissions will remain.

Ms. Descoteaux  
 May 14, 2020  
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The City cites the San Joaquin Valley Air Pollution Control District (SJVAPCD) Policy APR-2025, issued in 2014, and two MNDs approved by SCAQMD in 2014. The City states that its approach has been applied “for years” in light of those same documents. (FEIR at 23.) However, as the California Supreme Court has repeatedly held in more recent years, GHG law continues to evolve, and lead agencies have an obligation under CEQA to “stay in step.”<sup>4</sup> *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497, 504 (*SANDAG*).<sup>4</sup> The documents the City relied on are out of date and not the appropriate guidance for analyzing GHG impacts under CEQA.

Note that in 2014, the California Supreme Court had not yet issued its seminal *Newhall* decision, which was published on November 30, 2015. *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 230 (*Newhall*). The Court then issued the *SANDAG* decision on July 13, 2017. (*SANDAG, supra*, (2017) 3 Cal.5th 497.) The FEIR ignores post-2014 materials that establish its approach is unlawful, including the *SANDAG* California Supreme Court decision referenced above, as well as CARB’s 2017 Scoping Plan.<sup>5</sup>

The City also relies on *Association of Irrigated Residents v. Kern County Board of Supervisors* (2017) 17 Cal.App.5th 708 (*AIR*). However, as previously noted, *AIR* did not broadly validate the City’s approach of excluding all fuel and electricity related emissions from its GHG analysis, particularly for a project that is not regulated by the Cap-and-Trade Regulation. (See FEIR at 22, 23.) That issue simply was not before the court, and was not given due consideration as a result. (See Exhibit A at 6; Exhibit B at 11-12; Exhibit D at 30-31.) *AIR* is thus inapposite.

Finally, the City also attempts to argue that the Project would effectively be paying for GHG mitigation through fuel and electrical costs passed down to the end consumer. (FEIR at 18-19.) It still remains unclear how there would be any price signal to Project proponents in this situation, given that any fuel-related costs would be paid by the fuel suppliers, and potentially passed down to the Project’s tenant logistics companies. Regardless, these fuel costs would not be paid by the Project proponents.

<sup>4</sup> As the California Supreme Court has held, “CEQA requires public agencies ... to ensure that such analysis stay in step with evolving scientific knowledge and state regulatory schemes.” (*SANDAG* at 504.) The Court viewed the Scoping Plan as a particularly useful source of information, given the extensive study and public participation involved in its preparation. (*Ibid.*) A recent article provides a useful primer on this body of law. (See Jamill Richards, *The SANDAG Decision: How Lead Agencies Can “Stay in Step” with Law and Science in Addressing the Climate Impacts of Large-Scale Planning and Infrastructure Projects* (2017) 26:2 Environmental Law News 17.)

<sup>5</sup> Available at [https://sw3.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://sw3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). See, in particular, the “Climate Action through Local Planning and Permitting” chapter beginning at page 99, which describes the critical role played by local government contributions to CEQA reductions, including through the CEQA review process. See also CARB’s 2018 comment letter for more information on this point.

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In sum, the City's weak attempts to support the FEIR's unlawful GHG analysis and mitigation approach are without merit. Thus, the FEIR violates CEQA by failing to fully analyze and mitigate the significant GHG impacts of the Project.

**II. THE FEIR CONTINUES TO INCORRECTLY CLAIM THAT CARB SUPPORTS THE WLC'S GHG APPROACH.**

The FEIR continues to misrepresent CARB's views on GHG analysis and mitigation.<sup>6</sup> As noted in CARB's September 7, 2018 letter and in its *Paulek* amicus brief, CARB does not support the approach proposed; the approach is unlawful, inconsistent with relevant climate plans and regulations, and likely to set back the state's climate mitigation efforts if applied. Once again, the Cap-and-Trade Program was not designed to mitigate all GHG impacts associated with land use planning decisions. Rather, it was designed with responsible local CEQA compliance in mind as a complementary strategy. (See, e.g., 2017 Scoping Plan at 99-102.) Cap-and-Trade, which is neither tailored to nor affected by the Project, simply does not provide project-level mitigation in this case.

The FEIR points to several cherry-picked provisions from the 2011 Final Statement of Reasons for the Cap-and-Trade Project. (FEIR at 18-19.) Yet it fails to explain why there is not a single provision, from any point in time, indicating that CARB intended Cap-and-Trade compliance to constitute CEQA mitigation for unregulated entities and projects, or that it excuses land use projects wholesale from evaluating or mitigating their GHG emissions. Cap-and-Trade does not and CARB plainly never intended Cap-and-Trade to obviate CEQA mitigation requirements; that is a much bigger change that CARB would have expressly addressed had that been the intent. While the FEIR points out selected Scoping Plan provisions (FEIR at 25), it conveniently omits the directly applicable "Climate Action through Local Planning and Permitting" chapter describing how CARB relies on complimentary local planning actions (including robust CEQA analysis and mitigation) to accomplish the state's GHG mandates and goals. (See 2017 Scoping Plan at 99-102.) The City's approach would effectively render superfluous the CEQA mitigation recommendations in CARB's Scoping Plan, as there would be essentially nothing left to mitigate if agencies took the City's approach. It would also allow lead agencies to disregard their CEQA obligations and make less informed decisions. (See, e.g.,

<sup>6</sup> In the *Paulek* litigation, attorneys for the developer argued that because CARB did not specifically object to the project's GHG significance methodology in its early comment letters, CARB "apparently had no problem with the EIRs not counting capped emissions against the [WLC] in order to determine the significance of greenhouse gas emissions." (Transcript of January 22, 2018 hearing in *Paulek* case, before Hon. Sharon J. Waters, p. 18, lines 3-7.) The City has failed to address this issue or otherwise correct this clear and consequential misrepresentation in its responses to comments.

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*SANDAG, supra*, 3 Cal.5th at p. 519 (“nothing we say today invites regional planners to ‘shirk their responsibilities’ under CEQA.”).)

Despite failing to mitigate 95% of the Project’s emissions, the FEIR appears to claim that the Project would be consistent with the “Climate Action through Local Planning and Permitting” chapter of the Scoping Plan mentioned above. (FEIR at 29.) This is incorrect. As noted above, that chapter of the Scoping Plan discusses how the State needs more, not less, responsible GHG planning and mitigation from project developers and lead agencies. Here, the City seeks to avoid almost entirely its obligation to mitigate its GHG emissions.

### III. THE NEW GHG MITIGATION MEASURE 4.7.7.1 IS INADEQUATE.

As stated in our previous comments, under CEQA, the City must revise the FEIR to analyze all of the Project’s significant impacts relating to GHG emissions, including capped emissions. The FEIR must also adopt all feasible mitigation to address the Project’s significant GHG impacts. (*Newhall, supra*, 62 Cal.4th at p. 231.) Instead, the City revised the FEIR to add a mitigation measure for the Project, but this measure does not correct the FEIR’s CEQA violations. The new GHG mitigation measure would require the Project to purchase GHG offsets to mitigate its emissions, but only if the City loses the *Paulek* appellate litigation. (Measure 4.7.7.1.) This measure is inadequate for multiple reasons.

First, the City should adopt meaningful GHG mitigation measures in the FEIR, rather than continuing to avoid its responsibility to require mitigation unless specifically so ordered by a court. The City has conceded that such a measure is feasible by including its contingent GHG mitigation measure in the FEIR. (CEQA Guidelines, § 15092, subd. (b)(2)(A) (“A public agency shall not decide to approve or carry out a project for which an EIR was prepared unless . . . [t]he agency has . . . [e]liminated or substantially lessened all significant effects on the environment where feasible.”).) Indeed, more beneficial mitigation measures are feasible – including the use, for instance, of electrified trucks for the Project, which would reduce both GHGs and air pollution risk, as CARB has long recommended. Yet, the Project has not even adopted its inadequate offset measure, much less failed to explained why it has not adopted ostensibly feasible measures presented by CARB regarding design changes to favor zero emission vehicles. There is no indication in the record that even a more robust, legally-adequate GHG mitigation measure would be infeasible for the Project.

Second, the proposed measure, if it ever becomes effective, may not actually reduce the Project’s GHG emissions. Mitigation Measure 4.7.7.1 uses similar language to CARB’s offsets program, it lacks the essential safeguards that make CARB’s program successful. For example, the measure states that any offsets used must be “real, permanent, additional, quantifiable, verifiable, and enforceable by an appropriate agency.” (FEIR at 36.) However, these terms are not defined in the mitigation measure. They are left to the sole interpretation and discretion of the City’s Planning Official and thus not enforceable as CEQA requires. (See Pub. Resources Code, § 21081.6, subd. (b); CEQA Guidelines, § 15126.4, subd. (a)(2).) There is a broad continuum of voluntary-market offsets available for purchase by project proponents, ranging

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from ineffective and unenforceable to rigorous. It remains unclear which types of offsets would be deemed by the City's Planning Official to meet these undefined criteria.

In the land-use planning context, offsets—particularly offsets that are not tied to local projects—have distinct disadvantages as compared to on-site mitigation or other direct emission reduction measures. Offsets do not provide the important co-benefits of on-site mitigation such as local jobs, reduced local air pollution, local infrastructure and efficiency improvements. (See e.g. 2017 Scoping Plan at 102 (“CARB recommends that lead agencies prioritize on-site design features that reduce emissions, especially from [vehicle miles traveled], and direct investments in GHG reductions within the project’s region that contribute potential air quality, health, and economic co-benefits locally.”) This is why the 2017 Scoping Plan prioritizes local direct investments, and recommends turning to offset credits “[w]here further project design or regional investments are infeasible or not proven to be effective.” (2017 Scoping Plan at 102.) The proposed measure, by contrast, does not obligate the Project to first consider additional direct reductions, or other local or regional GHG emissions reductions, before deciding to purchase offsets. Such direct or local measures could otherwise benefit those in the Project vicinity. Furthermore, the measure does not in any way limit the percentage of offsets which may be used to mitigate the Project’s GHG emissions, as compared to more direct methods of GHG reduction. California’s Cap-and-Trade Program, for its part, sets a quantitative usage limit, which allows only 4-8% (depending on the calendar year) of an entity’s compliance obligation to be met through surrendering offsets. (See 17 Cal. Code Regs., § 95854.) This helps ensure that offsets are a relatively small part of the overall Cap-and-Trade Program, ensuring that the majority of GHG reductions come from reductions by regulated entities rather than from non-covered sectors.

The FEIR’s proposed measure entirely lacks this protection, instead allowing offsets (even ones that may not actually result in GHG reductions, as described above) as the sole GHG mitigation mechanism. These disadvantages, combined with the lack of any adequate criteria to ensure quality or enforceability of the offsets that may be purchased in this case, make the mitigation measure ineffective and unreliable.

Mitigation Measure 4.7.7.1 also seems to imply that CARB has broadly “approved” the offset registries it lists. The measure’s text states: “Credits registered by a carbon registry approved by the California Air Resources Board, such as, but not limited to, the Climate Action Reserve, American Carbon Registry, Verra (formerly Verified Carbon Standard) or GHG Reduction Exchange (GHG RX), shall be conclusively presumed to meet all of the criteria set forth above.” (FEIR at 36). CARB has approved only the American Carbon Registry, Climate Action Reserve, and Verra for the limited purpose of participation as Offset Project Registries in CARB’s Cap-and-Trade Program, pursuant to the process set forth in section 95986 of Title 17 of the California Code of Regulations. This approval only pertains to the registry’s participation in the Cap-and-Trade Regulation, in connection with issuing CARB offset credits. By contrast, the offsets contemplated by Mitigation Measure 4.7.7.1 are known as “voluntary market” offsets, which are generated under separate protocols adopted by the registries. CARB does not review

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these voluntary market protocols. CARB's "approval" of a registry as an Offset Project Registry under the Cap-and-Trade Program does not mean CARB has reviewed or approved that registry's voluntary market offset protocols.

Mitigation Measure 4.7.7.1 improperly bypasses onsite and local mitigation and violates CEQA because of its unenforceability and thus must be revised.

**IV. THE FEIR IMPROPERLY DECLINES TO ADOPT FEASIBLE MITIGATION MEASURES THAT WOULD SUBSTANTIALLY LESSEN THE PROJECT'S SIGNIFICANT ADVERSE EFFECTS.**

The FEIR simultaneously argues the proposed use of offsets and credits is a feasible mitigation measure, and yet refuses to adopt such a measure now by conditioning it on the outcome of the *Paulek* litigation. This approach violates CEQA, which instructs that "public agencies should not approve projects as proposed if there are... feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." (Pub. Res. Code 21002). The FEIR recognizes it is possible to offset the entire 232,402 metric tons of GHG from this Project but only guarantees the offset of 8,563 metric tons of GHG emissions. (See FEIR at page 39.) The entire 232,403 metric tons of GHGs will *not* be offset if the "trial court's judgment in *Paulek* is affirmed after the appellate process is completed or if the appeal is dismissed." However, if the appeal is dismissed, an appellate court will not have upheld the City's GHG analysis and, as described above, the City's misleadingly-named "capped" emissions would be considered a significant environmental effect. These emissions would need to be mitigated, and could be via a feasible and rigorous GHG mitigation measure (as described above). By refusing to adopt such a feasible mitigation measure here, the FEIR violates CEQA. (See CEQA Guidelines, § 15092.)

**V. MITIGATION MEASURE 4.7.7.1 IS "SIGNIFICANT NEW INFORMATION" THAT REQUIRES RECIRCULATION OF THE FINAL EIR.**

Pursuant to Public Resources Code section 21092.1, Mitigation Measure 4.7.7.1 is "significant new information" that requires a new opportunity for public comment. "Significant new information" includes a new "feasible way to mitigate or avoid [a substantial adverse environmental effect]... that the project's proponents have declined to implement." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1129, as modified on denial of reh. (Feb. 24, 1994)). As described above, Mitigation Measure 4.7.7.1 identifies a feasible, although not necessarily proper, way to mitigate the Project's greenhouse gas emissions, yet declines to adopt such mitigation unconditionally.

When "significant new information... is added to an environmental impact report after notice... but prior to certification" the public agency must "give notice again pursuant to Section 21092... before certifying the environmental impact report." (Pub. Resources Code, § 21092.1). Notice pursuant to Public Resources Code Section 21092(b)(2) requires a comment period.

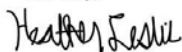
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However, Mitigation Measure 4.7.7.1 was added to the FEIR through a “Response to Comments on the Revised Sections of the Final EIR and Draft Recirculated Revised Sections of the Final EIR” without any such comment period. Instead, the City simultaneously released that document and a Notice of Completion informing the public that the Moreno Valley Planning Commission would review the Revised FEIR at a public hearing on May 14, 2020. Moreno Valley should have recirculated the EIR and provided an opportunity for public comment on the EIR with the addition of Mitigation Measure 4.7.7.1.<sup>7</sup>

#### VI. CONCLUSION

The Attorney General and CARB urge the City of Moreno Valley not to certify the FEIR without further revisions to the GHG analysis as described above. As stated in our previous comments, the City must take its obligations as a local government to mitigate climate change impacts seriously. The addition of a weak GHG measure that would apply only if the City’s approach is invalidated on appeal is not enough. However, if the City implements the actions that the state’s expert agencies have requested for years, the Project could be an important environmental leadership project. Indeed, the Project could create jobs by building a world-leading clean logistics project, protecting communities all along its supply chains. We encourage the City to take this opportunity to innovate and to lead. As always, we would be happy to work with the City to take the additional steps needed to fully comply with CEQA’s GHG analysis and proper mitigation requirements for the Project. We appreciate your consideration of our comments.

Sincerely,



HEATHER LESLIE  
Deputy Attorney General

For XAVIER BECERRA  
Attorney General

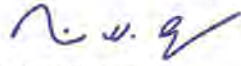
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<sup>7</sup> In its January 30, 2020 comments, CARB informed the City of its concerns with not being able to review the new GHG-related mitigation measure. (See January 30, 2020 CARB comment letter at page 1.) When CARB reached out to a City representative at that time, CARB was informed that the reference to the new GHG mitigation measure was included in the RRSFEIR in error, and it would be removed in the FEIR. Rather than remove that measure, the FEIR now includes a new GHG mitigation measure that has never before been circulated for public review, and which the City had previously indicated would not be part of the FEIR. The City only now has decided to release this measure as part of a vast FEIR package, just 14 days prior to the Project approval hearing.

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LETTER

RESPONSE

EXHIBIT A

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September 7, 2018

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RE: **Revised Sections of the Final Environmental Impact Report for the World Logistics Center Project**

Dear Mr. Armijo:

Attorney General Xavier Becerra submits the following comments on the Revised Sections of the Final Environmental Impact Report ("RFEIR") prepared for the World Logistics Center (the "Project").<sup>1</sup> The Project, a proposed warehouse and logistics complex in the City of Moreno Valley ("City"), would be one of the largest warehouse facilities in the world, with square footage equaling approximately 700 regulation-size football fields.

#### INTEREST OF THE ATTORNEY GENERAL

For well over a decade, the Attorney General has actively encouraged lead agencies to fulfill their CEQA responsibilities as they relate to climate change. It is now well-established that California, through law and policy, and consistent with sound science, is committed to achieving a low-carbon future by 2050 in order to reduce and avoid the most catastrophic effects of climate change. California has already begun to experience adverse climate effects, such as rising sea levels and longer, more intense fire seasons. The Attorney General is particularly concerned about how such effects may impact our most vulnerable communities, such as Inland Empire residents, who are already burdened by some of the worst air quality in the country.

<sup>1</sup> The Attorney General's Office submits these comments pursuant to his independent power and duty to protect the environment and natural resources of the State from pollution, impairment, or destruction, and in furtherance of the public interest. (See Cal. Const., art. V, § 13; Gov. Code, §§ 12511, 12600-12612; *D'Amico v. Bd. of Medical Examiners* (1974) 11 Cal.3d 1, 14-15.) This letter is not intended, and should not be construed, as an exhaustive discussion of the RFEIR's compliance with the California Environmental Quality Act ("CEQA").

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Every large development project has the potential either to facilitate, or instead hinder, the State's achievement of its climate goals. It is therefore important that as lead agencies consider the impacts of individual development projects – many of which will operate for decades into the future – they evaluate and impose feasible mitigation for climate change impacts.

With these goals in mind, the Attorney General has provided guidance to local governments, commented on potential projects, and engaged with local interest organizations concerned with climate change and environmental justice. (See California Department of Justice, Office of the Attorney General, *California Environmental Quality Act*, <https://oag.ca.gov/environment/ceqa> (as of Sept. 7, 2018).) The Attorney General has also participated in litigation throughout the State to ensure that local governments comply with state requirements to fully analyze and implement all feasible mitigation measures to lessen significant impacts from greenhouse gas emissions (“GHGs”) caused by land use development projects. (See, e.g., *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497; *People of the State of California v. County of San Bernardino* (Cty. of San Bernardino filed April 12, 2007) No. CIVSS700329.) The Attorney General also has a long-standing interest in ensuring environmental justice throughout the State and for communities in the Inland Empire. (See, e.g., *CCAEJ v. County of Riverside, et al.*, Case No. RIC1112063; California Department of Justice, Office of the Attorney General, *Environmental Justice at the Local and Regional Level: Legal Background* (July 10, 2012) [https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej\\_fact\\_sheet.pdf](https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf).)

After review of the GHG analysis in the RFEIR, the Attorney General believes that the City has failed to comply with CEQA's requirements for analyzing and implementing feasible mitigation for the significant GHG emissions that will result from this Project. For the reasons outlined below, the City's approach falls substantially short of meeting the requirements of CEQA, the regulations implementing CEQA – the CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.), and applicable case law. The City's approach in the RFEIR has the potential to seriously undermine the overall effort to meet the State's science-based GHG reduction goals for the transportation and land use sectors, and to disproportionately disadvantage environmental justice communities.

**THE RFEIR'S GHG ANALYSIS VIOLATES CEQA AND UNDERMINES THE STATE'S CLIMATE OBJECTIVES.**

As the RFEIR acknowledges, this Project at buildout will cause over 281,000 metric tons of GHGs to be released into the atmosphere every year, and will result in over 200,000 metric tons of GHG emissions beginning as early as 2028. (RFEIR at 4.7-3.5.) These emissions will presumably continue throughout the life of the project, though the RFEIR does not address this.

The RFEIR takes a very unusual and troubling approach to addressing the Project's GHG-related impacts, especially since climate pollution is undeniably a *cumulative* problem. (*Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 256-257.) The RFEIR divides the Project's GHG emissions into two categories, which it terms

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“capped” and “uncapped” – classifications created by this RFEIR. What the RFEIR deems “uncapped” emissions constitute only about 3% of the Project emissions. They include the comparatively minor landfill emissions caused by waste generated at the Project and the use of refrigerants at the Project. (RFEIR at 4.7-33.) For these emissions, the RFEIR follows the approach that would be expected under CEQA: the City has, in its discretion, designated a significance threshold (in this case, 10,000 metric tons of GHGs as recommended by the South Coast Air Quality Management District), compared the “uncapped” emissions to that threshold, and required feasible mitigation measures to ensure those emissions fall below that threshold.<sup>2</sup> (RFEIR at p. 4.7-19.) What the RFEIR terms “capped” emissions, however, constitute the remaining 97% of the Project’s predicted emissions. Those include emissions caused by mobile sources (namely, diesel trucks) and electricity use at the Project. (RFEIR at p. 4.7-33.) With respect to these emissions, the RFEIR deviates dramatically from standard CEQA methodology. The RFEIR asserts that these emissions are “covered” by the California Air Resources Board’s (“CARB”) Cap-and-Trade Program, and therefore claims that they are exempt from any further CEQA analysis or mitigation. (RFEIR at p. 4.7-22.) This is a novel and unsupported approach under CEQA.

As discussed below, the RFEIR’s approach does not comply with CEQA, for several reasons. First, the Project is not regulated under the State’s Cap-and-Trade Program, so purported compliance with that Program cannot be used to exclude 97% of the Project’s GHG emissions from the analysis of whether the Project’s GHG emissions will result in significant climate change impacts. Second, CEQA requires that all of the emissions attributable to the Project be evaluated for significance, regardless of their source. Third, when comparing all of the Project’s emissions to California’s ambitious, science-based climate goals, as well as statewide, regional, and local plans for the reduction or mitigation of GHG emissions, the Project’s GHG emissions are clearly significant, requiring further feasible mitigation measures.

We are concerned about the City’s use of this analytical approach, both in the context of this Project and more generally. If the RFEIR’s approach is put into general use by the City, or followed by other lead agencies, emissions from transportation and electricity could largely be exempt from analysis and mitigation under CEQA. This is directly counter to the purposes of CEQA, and the Legislature’s considered decision to make clear that GHG emissions must be analyzed. (Senate Bill 97 (2007); Pub. Resources Code, § 21083.05.) The State cannot meet its well-established, long-term environmental GHG reduction goals if new local projects are free to add hundreds of thousands of tons of GHGs to the atmosphere every year without undergoing the

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<sup>2</sup> Lead agencies may choose to use a “threshold of significance,” a working presumption that can assist in determining whether an impact is significant. (Cal. Code Regs., tit. 14, §§ 15064.4(b)(2); 15064.7.) “A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant.” (Cal. Code Regs., tit. 14, § 15064.7, subd. (a).)

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analysis and mitigation that CEQA requires. Moreover, the RFEIR's approach will likely expose already-burdened communities in the State to greater amounts of GHG co-pollutants, such as diesel particulate matter and nitrogen oxides.

We urge the City to revise its GHG analysis to comply with CEQA by properly evaluating whether *all* of the Project's emissions—for all phases of the Project, direct and indirect, short-term and long-term—are cumulatively significant, and adopting feasible mitigation to ensure those emissions do not have a significant impact on the environment.

**I. THE RFEIR'S NOVEL APPROACH TO "CAPPED" EMISSIONS VIOLATES CEQA.**

The purpose of an environmental impact report is "to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project." (Pub. Resources Code § 21061.)

The City's approach violates a number of well-established CEQA principles. Lead agencies must "consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect." (Cal. Code Regs., tit. 14 § 15003, subd. (h).) This Project as a whole includes both the "capped" and "uncapped" GHG emissions, but the RFEIR fails to analyze and mitigate "capped" emissions. Moreover, both "direct and indirect significant effects" and "short-term and long-term effects" should be considered. (Cal. Code Regs., tit. 14, § 15126.2, subd. (a).) The RFEIR fails to inform the public of the long-term effects of the Project's GHG emissions by failing to analyze GHG emissions past buildout.

In addition to violating these more general principles, the City's approach to "capped" emissions contradicts the CEQA Guidelines specific to GHG analysis. "The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data." (Cal. Code Regs., tit. 14, § 15064, subd. (b).) The CEQA Guidelines advise lead agencies on how to determine the significance of a Project's GHG emissions. A lead agency should consider three non-exclusive methods for determining climate significance:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project[;]
- (3) 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 greenhouse gas emissions. . . . If there is substantial evidence that the possible effects of

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a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project. (Cal. Code Regs., tit. 14, § 15064.4, subd. (b)).

While “[a]n ironclad definition of significant effect is not always possible,” (Cal. Code Regs., tit. 14 § 15064, subd. (b)), the RFEIR’s conclusion that the Project’s GHG impacts are not significant under CEQA (RFEIR at p. 4.7-33) is based solely on its unjustifiable exclusion of the vast majority of the GHG emissions of the Project. That exclusion is neither consistent with CEQA nor justified by the Cap-and-Trade Program, which does not apply to the Project.

**A. Since the Project is Not Regulated Under Cap-and-Trade, The RFEIR Cannot Use Cap-and-Trade to Ignore the Significance of the Project’s GHG Emissions.**

The RFEIR effectively treats the Cap-and-Trade Program as if it is a qualified mitigation plan for the Project and its “capped” emissions. (See Cal. Code Regs., tit. 17, §§ 15064, subd. (h)(3); 15064.4 subd. (b)(3).) It is not.

California’s Cap-and-Trade Program applies “an aggregate greenhouse gas allowance budget [to] covered entities and provides a trading mechanism for compliance instruments.” (Cal. Code Regs., tit. 17, § 95801 (emphasis added).) The Cap-and-Trade Program only applies to expressly identified entities, such as cement producers, petroleum refiners, electricity generators, natural gas supplies, fuel importers, and liquid petroleum gas supplies. (Cal. Code Regs., tit. 17, § 95811.) Warehouse and logistics complexes are *not* covered entities.

Although the operator of a refinery that produces liquefied petroleum gas in California is subject to the Cap-and-Trade Program, (Cal. Code Regs., tit. 17, § 95811, subd. (e)(1)), entities downstream from that refinery in the chain of commerce are not. The refinery itself may have compliance obligations under the Cap-and-Trade Program, which can be met by reducing its own GHG emissions or surrendering compliance instruments, but the gas station that resells the gas, the truck drivers who purchase it, and the warehouses to which the trucks drive do not. Because CEQA Guidelines section 15064.4, subdivision (b)(3) instruct lead agencies to consider the extent to which *the project* complies with GHG regulations or requirements, it is inappropriate to rely upon compliance with Cap-and-Trade by other entities downstream in the chain of commerce as a basis for avoiding analysis of project-related emissions. In the Final Statement of Reasons for the CEQA Guidelines addressing GHG emissions, the California Natural Resources Agency confirmed that, in implementing CEQA Guidelines section 15064.4, a lead agency must show that a GHG reduction plan “actually addresses the emissions that would result from the project.” (California Natural Resources Agency, Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97 (2009), available at [http://resources.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf), at p. 27.)

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Further, the City's approach is not, as the RFEIR claims (RFEIR at 4.7-20), supported by *Association of Irrigated Residents v. Kern County Bd. of Supervisors* (2017) 17 Cal.App.5th 708 ("AIR"). Without commenting on whether or not that case was rightly decided, AIR is facially inapposite because the project being evaluated under CEQA in that case was a refinery, a covered entity under the Cap-and-Trade Program. Because this Project is not a covered entity under the Cap-and-Trade Program, it is unjustifiable for the RFEIR to use compliance with Cap-and-Trade as a factor in analyzing the significance of the Project's GHG emissions. There is no basis in the law for the use of Cap-and-Trade to exclude a full 97% of the Project's GHG emissions from analysis or mitigation.

The flaw in the City's approach becomes even more apparent when one considers its incongruous results. The RFEIR describes the Project, in part, as follows: "Goods imported through the Ports of Long Beach and Los Angeles as well as other locations are delivered via truck to the proposed distribution centers and distributed via truck both in and out of state locations. . . ." (Original FEIR at 3-27-3-28.) The heart of this Project is this movement of goods via trucks. Yet, the City's approach avoids any analysis of 210,596 metric tons of GHG emissions associated with the movement of goods via trucks. (RFEIR at p. 4.7-33.) 97% of the Project's total GHG emissions are simply dismissed under this approach. CEQA does not permit such a dismissal.

**B. The RFEIR Must Consider All Emissions in Determining Significance.**

Correctly applying CEQA requires an evaluation of *all* the Project's GHG emissions in determining significance. (See Cal. Code Regs., tit. 14, §§ 15064.4, subd. (b)(2); 15378 (defining "project" as "the whole of an action. . . .")) There is no basis here for comparing some of the Project's emissions to the significance threshold, but not others. Here, the City elected to use a threshold of 10,000 metric tons of GHGs. (RFEIR at p. 4.7-19.) CEQA Guidelines section 15064.4, subdivision (b)(2), notes that when using a threshold, an agency should compare all of the "project emissions" of GHGs to that threshold. Emissions from trucks and electricity are a result of the Project just as much as the "uncapped" emissions. They therefore must be compared to the significance threshold, and mitigated to the extent feasible.

Further, the City's attempt to exempt an impact from any significance analysis based solely on purported compliance with a single rule or regulation is unwarranted. Courts have repeatedly held compliance with a single environmental or land use law or regulation does not create an exemption from CEQA's requirement that lead agencies evaluate all of a project's significant environmental impacts. For example, "compliance with a general plan in and of itself 'does not insulate a project from the EIR requirement, where it may be fairly argued that the project will generate significant environmental effects.'" (*East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 301; see also *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 732 ("[A]n EIR is required if substantial evidence supports a fair argument that [a project] may have significant unmitigated noise impacts, even if other evidence shows the [project] will not generate noise in excess of [a] County's noise ordinance or general plan."))

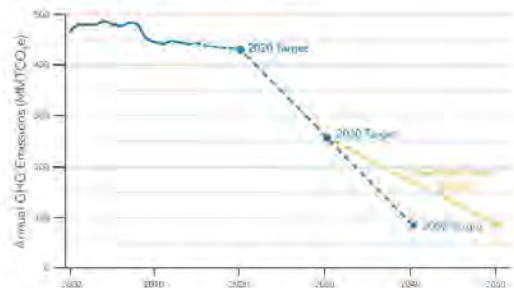
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**C. In Light of the Project's Substantial, Long-Term Projected Emissions, Its GHG Impacts Must Be Deemed Significant.**

It seems impossible a proper evaluation of the Project's emissions under CEQA could support a finding that the Project's emissions are not significant. This Project—as currently designed—will lock in hundreds of thousands of tons of GHG emissions for decades to come, and may put this City and the region on a path that deeply undermines the State's climate goals.

To reduce and avoid the most catastrophic effects of climate change, science tells us that we must dramatically reduce our annual statewide GHG emissions. California has taken ambitious steps to accomplish that objective. Assembly Bill 32 ("AB 32") requires California to reduce its total statewide GHG emissions to 1990 levels by 2020. (Health & Saf. Code, § 38550.) Under Senate Bill 32 ("SB 32"), California must reduce its GHG emissions to 40% below 1990 levels by 2030. (Health & Saf. Code, § 38566.) In addition, the Governor's Executive Order S-3-5 ("EO S-3-05") directs state agencies to reduce statewide GHG emissions to 80% below 1990 levels by 2050. To achieve such ambitious but necessary goals, California will have to reduce GHG emissions from various sectors of the economy. Transportation, industry, and electricity generation are the top three contributing sectors to the State's total GHG emissions. (CARB, 2017 Climate Change Scoping Plan (Nov. 2017) at p. 11 ("Scoping Plan").) Below is a graph showing the dramatic downward trajectory of statewide GHG reductions necessary to achieve the State's climate goals.

FIGURE S: PLOTTING CALIFORNIA'S PATH FORWARD



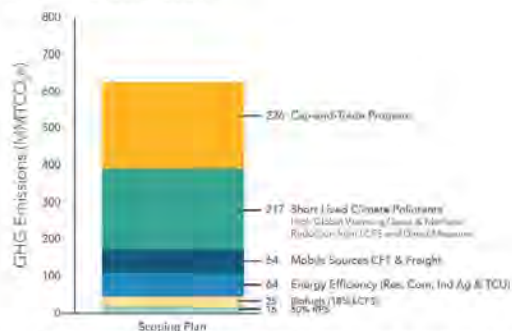
(Scoping Plan at p. 24.)



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California has adopted a multitude of regulations, requirements, plans, and policies to achieve the substantial reductions in statewide GHG emissions required by AB 32, SB 32, and EO S-3-5. CARB identified, in its Climate Change Scoping Plan, multiple required and voluntary measures working in concert as necessary for California to achieve its ambitious climate goals as depicted in the graph below. (See Scoping Plan at p. 28.)

FIGURE 7: SCOPING PLAN SCENARIO – ESTIMATED CUMULATIVE GHG REDUCTIONS BY MEASURE (2021–2030)<sup>64</sup>

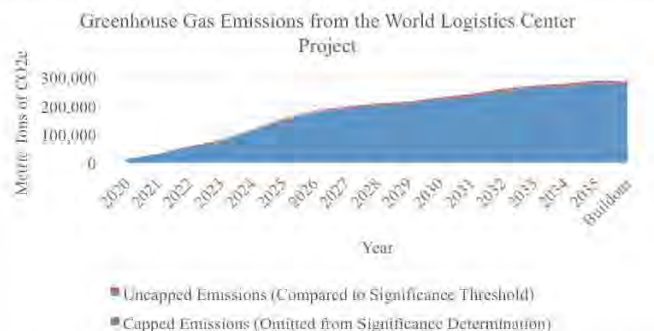


The Scoping Plan proposes various strategies for reductions in emissions from transportation and energy sectors. The Scoping Plan notes that for the GHG reductions from the transportation sector, “[vehicle miles traveled (“VMT”)] reductions are necessary to achieve the 2030 target and must be part of any strategy evaluated in this plan.” (Scoping Plan at p. 112.) In addition, under SB 375, CARB assigns California’s 18 Metropolitan Planning Organizations targets for GHG emission reductions in the transportation sector which are to be achieved based on land use patterns and transportation systems. (CARB, Updated Final Staff Report: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets (2017), available at [https://www.arb.ca.gov/cc/sb375/final\\_staff\\_proposal\\_sb375\\_target\\_update\\_october\\_2017.pdf](https://www.arb.ca.gov/cc/sb375/final_staff_proposal_sb375_target_update_october_2017.pdf).) CARB’s recommended target for the Southern California Association of Governments is a 19% reduction in GHG emissions from transportation by 2035. (*Id.* at p. 34.)

CEQA requires the City evaluate the consistency of the Project’s substantial increases in GHG emissions with state and regional plans and policies calling for a dramatic reduction in GHG emissions. The Supreme Court in *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 3 Cal.5th 497 (“SANDAG”) affirmed that an EIR should consider the project’s long-range greenhouse gas emission impacts through the year 2050, and address whether the project as a whole is in accord with the state’s climate goals. (*Id.* at p. 515.) The Supreme Court further instructed lead agencies to “stay in step with evolving scientific knowledge and state regulatory schemes.” (*Id.* at p. 504.)

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The RFEIR estimates that the Project’s total emissions will increase from the existing conditions of no emissions at the Project site to over 281,000 metric tons of GHG emissions annually at full buildout of the Project in 2040. (RFEIR at p. 4.7-33.) See the graph below depicting the trajectory of the Project’s GHG emissions.<sup>3</sup>



The Project’s substantial *increase* in GHG emissions conflicts with the downward trajectory for GHG emissions necessary to achieve state climate goals. This is illustrated clearly in the sharp difference in the upward trajectory of the graph of the Project’s GHG emissions versus the steep downward trajectory in the graph of the State’s climate goals as depicted in Figure 5 of the Scoping Plan and reproduced above. Yet, the RFEIR failed to evaluate the Project’s consistency with state and regional goals, requirements, plans, and policies to reduce

<sup>3</sup> Visual depictions such as this graph make it easier to understand the significant impact of GHG emissions from the Project on the environment. Such clarity is encouraged by the CEQA Guidelines, which state that EIRs should be “written in plain language and may use appropriate graphics so that decisionmakers and the public can rapidly understand the documents.” (Cal. Code Regs., tit. 17, § 95811.) Such graphs are also helpful because they allow the decisionmakers to see a project’s proposed greenhouse gas emissions as a trajectory and assess the “significance of the *shape* of that emissions curve as a whole.” (Janill Richards, *The SANDAG Decision: How Lead Agencies Can “Stay in Step” with Law and Science in Addressing the Climate Impacts of Large-Scale Planning and Infrastructure Projects* (2017) 26:2 Environmental Law News 17, 19, available at [http://legal-planet.org/wp-content/uploads/2018/09/environmental-law-news\\_2017\\_vol-26-no-2\\_fall\\_the-sandag-decision.pdf](http://legal-planet.org/wp-content/uploads/2018/09/environmental-law-news_2017_vol-26-no-2_fall_the-sandag-decision.pdf).) To better inform the public of the Project’s unmitigated GHG emissions, we recommend revising the RFEIR to include graphical representations of the emissions trajectory of the project.

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GHGs that should have been analyzed under CEQA. Comparing the Project's GHG trajectory against the state's climate goals would inform the public of the Project's GHG impacts. For example, the RFEIR's GHG analysis should have considered whether the Project will increase VMT. Because it did not, it is inconsistent with SB 375. Although the RFEIR's revised traffic analysis does include a VMT analysis, it is included only to address air quality issues, and not GHGs. (RFEIR at pp. 4.7-19 and 4.15-3.) Under CEQA, the City is required to consider how the project can reduce VMT and electricity use, "rather than expecting[ing] these reductions to come [only] from technological advances or other measures." (*SANDAG*, at 523.) The City ignores its CEQA obligations and instead, the RFEIR obscures the Project's GHG impacts by improperly exempting them from CEQA analysis.

In addition, there is no discussion in the RFEIR of the GHG emissions from the Project over its expected lifespan. GHG emissions are estimated up until the Project's full buildout in 2040 (RFEIR at p. 4.7-33), but the Project will clearly continue beyond that point, and the RFEIR gives no indication of how long that will be. The cumulative impact of the Project's GHG emissions over its entire lifespan should be considered and mitigated to the greatest extent feasible. Notably, by failing to estimate emissions through 2050, the RFEIR obscures the extent to which the Project does or does not comply with California's explicit 2050 climate goals.

**D. The RFEIR Should Analyze and Adopt Feasible Mitigation Measures to Avoid or Lessen the Project's GHG Impacts.**

CEQA requires that an EIR consider and adopt feasible alternatives or mitigation measures that would substantially lessen the significant and harmful environment effects of the project being analyzed. (See Pub. Resources Code, § 21002.) The RFEIR's failure to properly analyze the Project's significant GHG impacts also results in a failure to mitigate those impacts as required by CEQA. If the RFEIR's analysis were done properly, the Project's GHG emissions from vehicles and electricity would have vastly exceeded the significance threshold selected by the City. Those emissions would therefore have to be reduced through changes or alterations in the Project, or the City would be required to explain why "[s]pecific economic, legal, social, technological, or other considerations including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives. . . ." (Cal. Code Regs., tit. 22, § 15091, subds. (a)(1) and (a)(3).) There may be mitigation measures or project alternatives that could reduce or avoid the Project's GHG emissions, such as the adoption of requirements mandating the use of zero emission vehicles or a certain percentage of electricity from renewable electricity sources, such as on-site solar power generation.<sup>4</sup> By

<sup>4</sup>The Attorney General recognizes that devising climate mitigation on a project-by-project basis can be challenging. Many local governments have therefore elected to move toward enforceable Climate Action Plans ("CAPs") integrated with their general plans. (CARB, California Climate Action Portal Map, <https://webmaps.arb.ca.gov/capmap/> (as of Sept. 7, 2018).) Done correctly, CAPs can put local governments on the path to a lower-carbon future

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excluding 97% of the Project's GHG emissions from its significance determination, the RFEIR obscures the extent of the Project's emissions and improperly evades the City's obligation to mitigate the Project's GHG impacts.

**II. ADOPTION OF THIS METHOD OF EXEMPTING "CAPPED" EMISSIONS FROM CEQA ANALYSIS WILL UNDERMINE THE STATE'S VARIOUS POLICIES AND PROGRAMS TO REACH OUR AMBITIOUS CLIMATE GOALS.**

The RFEIR's failure to comply with CEQA will have real consequences. If this RFEIR's approach is widely adopted, the State will not be able to achieve its ambitious climate goals. The RFEIR exempts the Project's emissions attributable to mobile sources and electricity use from CEQA analysis and mitigation. And yet transportation and electricity are two of the State's three largest sources of GHG emissions. (Scoping Plan at p. 11). Transportation and electricity are thus two of the most important areas in which GHG emissions must be reduced.

The RFEIR's approach to the transportation and electricity sectors incorrectly presumes that the Cap-and-Trade Program will achieve *all* GHG reductions necessary in those areas. But as CARB's 2017 Scoping Plan points out, "[l]ocal land use decisions play a particularly critical role in reducing GHG emissions associated with transportation, both at the project level, and in long-term plans..." (Scoping Plan at pp. 100-101.) If other lead agencies adopt the City's approach, millions of metric tons of GHGs resulting from development projects would be ignored and unmitigated through what amounts to a categorical exemption from CEQA. Local governments would therefore not be doing their part to help the State reach its ambitious, yet necessary, climate goals of emitting 40% below 1990 GHG levels by 2030 and 80% below 1990 levels by 2050. (Heath & Saf. Code, § 38566, Governor's Executive Order No. S-3-05 (June 1, 2005).)

Instead of claiming that no amount of transportation and electricity emissions can be significant under CEQA, and thus excluding them from any analysis and mitigation, lead agencies have an obligation to acknowledge the significance of such emissions and work to implement feasible mitigation of them.<sup>5</sup>

**III. REVISING THE GHG ANALYSIS WILL LIKELY LEAD TO GREATER PROTECTION OF ENVIRONMENTAL JUSTICE COMMUNITIES.**

In addition to, and separate from, the CEQA issues, revising the RFEIR's GHG analysis will likely help mitigate some of the Project's direct harmful effects on environmental justice communities. Moreno Valley contains some of the most pollution-burdened census tracts in the

while substantially streamlining the approval of individual projects that are consistent and comply with the CAP.

<sup>5</sup> There are several examples of economically viable land use development projects that contributed no net additional GHG emissions. (Scoping Plan at p. 99.)

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State according to California Environmental Protection Agency's CalEnviroScreen tool.<sup>6</sup> City residents experience ozone and particulate matter (PM) 2.5 at rates higher than 90% of the State. The South Coast Air Basin, where Moreno Valley is located, exceeds federal public health standards for ozone, ozone precursors, and particulate matter. Exposure to these air contaminants contributes to asthma, lung cancer, and cardiovascular disease. Indeed, residents in Moreno Valley experience higher than average emergency room visits due to asthma and higher than average rates of cardiovascular disease, particularly residents living along freeways.

Furthermore, environmental justice concerns are significant for the residents of Moreno Valley. Moreno Valley residents are predominately people of color, made up of 56.5% Hispanic and 18% African American populations. (United States Census Bureau, Quick Facts for Moreno Valley, California, <https://www.census.gov/quickfacts/fact/table/morenovalleyca/california/ca/PST045217> (as of Sept. 7, 2018).) The rates of poverty are dramatically higher in Moreno Valley compared to the state—according to U.S. Census data, 18.6% of Moreno Valley residents live in poverty, compared with the statewide poverty rate of 14.4%. (*Ibid.*, and United States Census Bureau, Quick Facts for California, <https://www.census.gov/quickfacts/fact/table/ca/PST045217> (as of Sept. 7, 2018).) They experience high rates of unemployment and housing burdens (paying more than 50% of their income for housing costs). These socioeconomic characteristics of Moreno Valley residents increase their sensitivity to the health effects of the heavy pollution burdens they experience.

Adding to these burdens, Riverside County as a whole, and the City of Moreno Valley specifically, are experiencing a great influx of logistics warehouse projects. Recent developments in Moreno Valley alone include an 825,000 square-foot distribution facility for the Aldi grocery chain, a 1.6 million square-foot distribution facility for Deckers Brands footwear company, and a 1.25 million square-foot fulfillment center for Amazon. These large projects, and their related impacts on the low-income communities of color who live nearby and in the communities residing along the freeways serving them, are dwarfed by the over 40 million square-foot Project.

By conducting a proper GHG analysis in the RFEIR and adopting feasible mitigation, the City will likely better protect the environmental justice communities living near both the Project and along the freeways that trucks will use to reach the Project. Reduction of GHG emissions leads to the reduction of co-pollutant emissions. (See Nicky Sheats, *Achieving Emissions Reductions for Environmental Justice Communities Through Climate Change Mitigation Policy* (2017) 41 WM. & MARY ENVTL. L. & POL'Y REV. 377, 387 ("[E]ven without the intentional maximization of co-pollutant reduction, there should be incidental co-pollutant

<sup>6</sup> CalEnviroScreen is a tool that uses environmental, health, and socioeconomic information to produce scores and rank every census tract in the state. A census tract with a high score is one that experiences a much higher pollution burden than a census tract with a low score. (See CalEnviroScreen 3.0 Report, Office of Environmental Health Hazard Assessment, January 2017, available at <https://oehha.ca.gov/media/downloads/calenviroscreenreport.ces3report.pdf>.)

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reductions as GHGs are being reduced [which] should improve the health of local communities.”) This is especially true in the context of diesel truck emissions, where a VMT reduction would reduce both GHG emissions and co-pollutant emissions. Indeed, the RFEIR acknowledges that “[t]he *most effective way to reduce air pollution* impacts on the health of our nearly 17 million residents, including those in disproportionately impacted and environmental justice communities that are concentrated along our transportation corridors and goods movement facilities, *is to reduce emissions from mobile sources*,” and that those mobile sources constitute “the principal contributor to our air quality challenges.” (RFEIR at 4.3-11 (emphasis added).) Therefore, while revising the GHG analysis is necessary to comply with CEQA, the City should also see this as an opportunity to implement mitigation measures that would benefit the City’s residents and the other environmental justice communities impacted by this Project.

#### CONCLUSION

We appreciate the difficulty in analyzing GHG emissions under CEQA. However, local agencies must comply with the CEQA Guidelines for GHG analysis and cannot exempt GHG emissions from any significance analysis because of California’s Cap-and-Trade Program. We urge the City of Moreno Valley to revise the GHG analysis in the RFEIR as described above so as to support this State’s efforts to reduce GHG emissions, achieve our ambitious but necessary climate goals, and benefit local communities in the area who are already suffering some of the worst air pollution in the country. We would be happy to work with the City of Moreno Valley to take the additional steps needed to fully comply with CEQA’s GHG analysis and mitigation requirements for the Project. We appreciate your consideration of our comments.

Sincerely,



HEATHER LESLIE  
BRIAN BILFORD  
Deputy Attorneys General

For XAVIER BECERRA  
Attorney General

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LETTER

RESPONSE

EXHIBIT B



Mary D. Nichols, Chair  
 Matthew Rodriguez, CalEPA Secretary  
 Edmund G. Brown Jr., Governor

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Re: World Logistics Center Revised Final Environmental Impact Report  
 (SCH # 2012021045)

Dear Mr. Armijo:

The California Air Resources Board (CARB) has reviewed the World Logistics Center (WLC or project) Revised Final Environmental Impact Report (RFEIR). CARB appreciates the opportunity to comment on the RFEIR. Unfortunately, despite revisions, the RFEIR mischaracterizes (1) the scope of the Cap-and-Trade Program administered by CARB as they relate to the state's overall greenhouse gas reduction mandates, and (2) how that program may be relevant to a CEQA analysis. Because the RFEIR's GHG analysis relies almost entirely on those mischaracterizations for its GHG analysis and significance determination, it does not meet California Environmental Quality Act (CEQA) requirements.

The RFEIR's core flaw with regard to greenhouse gases (GHGs) is that it declines fully to analyze or mitigate emissions from fuel and electricity demand that the project will cause - the vast majority of the project's emissions - on the ground that CARB's Cap-and-Trade Program purportedly "covers" the project's emissions for this purpose. In fact, the Program does not, and was never designed to, adequately address emissions from local projects and CEQA does not support a novel exemption for such emissions on this ground. The RFEIR's approach obscures the project's significant potential contribution to greenhouse gas emissions, and does not properly account for the combination of federal, state, and local approaches to address climate change that the crisis demands and the law requires.

We also note that the project still has not been modified to address serious health concerns from criteria and toxic air pollutants that CARB discussed in prior letters. Although this letter focuses on GHGs, we continue to be very concerned that local communities may face undue pollution from this project, if completed, as a result of inadequate mitigation.

We urge the City of Moreno Valley (City) to address the criteria and toxics issues we previously raised, and to revise its GHG analysis to accurately account for all GHG emissions that would result from the project, apply those emissions against the applicable significance threshold identified in the RFEIR, adopt feasible mitigation to



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ensure those emissions would not cause significant impacts, and recirculate the RFEIR, all as required by CEQA.

#### I. CARB's Participation in This Project's Review Process

CEQA requires analysis of a project's GHG emissions. Like all CEQA analyses, these disclosures must inform the public and provide appropriate information on mitigation. Planning for greenhouse gas reductions is critical at the project level, as CARB and other state agencies have repeatedly determined. Although various statewide programs address the climate change crisis as well, the CEQA guidelines, and state guidance documents, are clear that achieving the necessary reductions requires project-level focus.

The WLC project proponents have taken a different view in prior versions of the RFEIR and in related litigation, *Paulek v. City of Moreno Valley* (Riverside County Superior Court Case No. RIC 1510967) ("*Paulek*"). That case addresses, among other topics, the initial GHG analysis conducted for the WLC, and in the RFEIR. There, WLC advocates contended that, because some of the suppliers of the fuels and electricity consumed by the project are in the Cap-and-Trade Program CARB administers, the project was not required to analyze or mitigate the significant emissions impacts it would cause. Attorneys for the WLC also argued that because CARB did not specifically object to the project's GHG significance methodology, CARB "apparently had no problem with the EIRs not counting capped emissions against the [WLC] in order to determine the significance of greenhouse gas emissions."<sup>1</sup>

CARB had, in fact, recommended an array of project-based emissions reductions strategies contrary to these claims. CARB takes this opportunity to reiterate those recommendations (prior letters are attached) and to explain why the Cap-and-Trade Program's operations do not allow a departure from CEQA's general rule that project-level impacts be properly addressed.<sup>2</sup>

<sup>1</sup> Transcript of January 22, 2018 hearing in *Paulek* case, before Hon. Sharon J. Waters, page 18, Lines 3-7.

<sup>2</sup> In both of CARB's comment letters, which we again incorporate by reference, CARB indicated that its recommendations were for the purpose of reducing not only criteria and toxics pollutants, but also for GHG emissions. CARB reviewed the Draft Environmental Impact Report (DEIR) and provided comments to the City of Moreno Valley in a letter dated April 16, 2013. CARB's comment letter expressed concern over the increase in health risk in the immediate area and the significant and unavoidable air quality and greenhouse gas (GHG) related impacts caused by the proposed WLC. To address those concerns, CARB recommended actions to support the development, demonstration, and deployment of zero and near-zero emission technology at the WLC. On June 8, 2015, CARB again provided comments on the Final Environmental Impact Report (FEIR), making similar recommendations. In those comments, CARB noted that the FEIR was unresponsive to the comments CARB provided in its April 16, 2013 letter regarding the DEIR. (See CARB April 16, 2013 letter at 2; CARB June 8, 2015 letter at 1, 3, and 8.)

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## II. The RFEIR's Claims About CARB's Cap-and-Trade Regulation Are Incorrect

CEQA translates between high-level policy goals, and individual project choices to better inform the public and support decision-making. The GHG section of the RFEIR takes a novel, and factually unsupported, departure from ordinary CEQA practice by essentially excusing analysis and potential mitigation of GHG emissions when they are indirectly "covered" by a state program. Yet, state programs regularly address at least some aspect of essentially all CEQA impact areas – from state water pollution standards to habitat conservation laws to building codes to endangered species mandates, projects are always considered against a backdrop of state rules. In the ordinary course, the presence of state programs is not taken simply to "cover" the relevant project level impact. On the contrary, CEQA requires project proponents to inquire as to how the project affects environmental resources of statewide concern and to focus on project-level analysis and mitigation. The same rule applies with regard to greenhouse gases. As the California Supreme Court has held, "[l]ocal governments thus bear the primary burden of evaluating a land use project's impacts on greenhouse gas emissions."<sup>3</sup>

Project proponents may refer to statewide analyses and programs, but, as the Court held, ultimately must provide "substantial evidentiary support" explaining how project-level decisions relate to state-level programs to justify findings of significance based on those programs.<sup>4</sup> This is particularly important for new projects, as, per the Court, "a greater degree of reduction may be needed from new projects than from the economy as a whole."<sup>5</sup> And these projects may not simply point to *any* statewide regulations; on the contrary, "[a] significance analysis based on compliance with such statewide regulations ... only goes to impacts within the area governed by the regulations."<sup>6</sup>

In this instance, the Cap-and-Trade Program simply does not cover the project, or require it do anything to mitigate its emissions. As the Court explained, CARB has not "propose[d] statewide regulations of land use planning, but relies instead on local governments." (*Id.* at 230).

CARB has expressed its non-binding views on these matters via the Scoping Plans it is required to prepare under AB 32. The California Supreme Court has recognized the

CARB was not silent. Moreover, an inference from silence would be improper, in any event. CARB sometimes does not comment on individual projects' GHG or other analyses due to resource constraints and other considerations. Nothing should be inferred from silence on a particular matter.

<sup>3</sup> *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 230).

<sup>4</sup> *Id.* at 226-230.

<sup>5</sup> *Id.* at 225.

<sup>6</sup> *Id.* at 229.

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Scoping Plan as a valuable source of data for local governments.<sup>7</sup> As each version of CARB's Scoping Plan, including the recent 2017 Scoping Plan Update, explains, on the basis of extensive modeling and analysis, the Cap-and-Trade Program is not intended to address project-level impacts and does not do so. Rather, complementary measures, including land-use planning and project-level analyses, are vital adjuncts to the Cap-and-Trade Program, serve additional purposes to address climate change, and, if neglected, put undue and unanticipated pressure on the Program. The RFEIR's analysis would thus make the problem it purports to analyze even worse; if followed generally, it would result in development patterns and mitigation choices that would lessen the state's ability to address climate change, and would contribute to cumulatively considerable impacts.

Rather than address project-level emissions, the Cap-and-Trade Program covers activities related to electricity generation, natural gas supply, oil and gas extraction, refining, and transportation fuel supply and combustion. The points of regulation are the operators of electricity generating plants, natural gas fuel suppliers, operators of oil and gas extraction facilities, refinery operators, and transportation fuel suppliers at the rack. See Tit. 17, Cal. Code Regs., § 95811. The Program also addresses GHG emissions in aggregate at the state level and is not intended nor designed to mitigate greenhouse gas from, or otherwise inform, local land use decisions. Without adequate analysis and mitigation, local jurisdictions may not appropriately consider the greenhouse gas implications of their decisions, conflicting with a core CEQA principle of promoting informed decisionmaking. Rather, demand for fuels and electricity created by poorly-planned local projects creates unnecessary demand on the Cap-and-Trade system, potentially raising prices in the system and making statewide compliance more difficult.

These impacts could be substantial because the transportation sector is the state's largest source of GHG emissions (as well as criteria and toxic pollutant emissions, as we have previously addressed with regard to this project). The recently released California Greenhouse Gas Emission Inventory – 2018 Edition shows that while the state's overall GHG emissions declined from 2015 to 2016, the emissions in the transportation sector increased 2 percent over that same time period.<sup>8</sup> This increase was driven by increases in fuel purchases and use. To effectively achieve the State's GHG target, both production and demand for energy and fuels must be addressed. The

<sup>7</sup> As the California Supreme Court has held "CEQA requires public agencies...to ensure that such analysis stay in step with evolving scientific knowledge and state regulatory schemes." The Court viewed the Scoping Plan as a particularly useful source of information, given the extensive study and public participation involved in its preparation. (*Cleveland National Forest Foundation v. San Diego Ass'n of Governments* (2017) 3 Cal. 5<sup>th</sup> 497, 504.) A recent article provides a useful primer on this body of law. (See Janill Richards, *The SANDAG Decision: How Lead Agencies Can "Stay In Step" with Law and Science in Addressing the Climate Impacts of Large-Scale Planning and Infrastructure Projects* (2017) 26:2 Environmental Law News 17))

<sup>8</sup> See [https://www.arb.ca.gov/cc/inventory/pubs/reports/2000\\_2016/ghg\\_inventory\\_trends\\_00-16.pdf](https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2016/ghg_inventory_trends_00-16.pdf).

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Legislature recognized this need with regard to electricity when passing SB 350 (Stats. 2015 Ch. 547, De León) to increase the Renewable Portfolio Standard and double energy savings. A similar approach is needed for transportation sector emissions. State-level production side policies such as the Renewable Portfolio Standard, Low Carbon Fuel Standard, and Cap-and-Trade Program cannot alone achieve the State's GHG reduction targets.

In this instance, the RFEIR not only improperly relies on the Cap-and-Trade Regulation; it also fails fully to address consistency with the local measures that *do* more clearly apply. There are a suite of potential emissions reduction strategies identified in the 2017 Scoping Plan aimed at reducing GHG emissions from on-road vehicle travel (e.g., fuel economy standards, technology advancements, SB 375<sup>9</sup>), and the majority of such emissions are not covered in any way by the Cap-and-Trade program.

The City chose not to analyze the project's consistency with the applicable Regional Transportation Plan (RTP), for example, which is subject to GHG emissions reduction targets set by CARB pursuant to SB 375. The City asserted that the RTP does not apply to this project (Table 4.7-11, page 4.7-41 of the RDEIR). We disagree, and suggest that a more appropriate analysis would be whether the project's GHG emissions from on-road transportation would be consistent with, or conflict with, assumptions in the applicable RTP found to comply with SB 375. The city might also refer to the additional nonbinding recommendations offered in CARB's Scoping Plan, though the application of these recommendations, if used, depend on the circumstances of a particular project.

We discuss these points in more detail below.

A. The Cap-and-Trade Regulation Was Never Designed to Achieve All Necessary GHG Reductions From Land Use and Logistics Planning.

The Cap-and-Trade Program was designed from the start as one of a diverse suite of measures, some statewide and some local, to move California toward achieving its GHG targets. To understand the Cap-and-Trade Program's purposes and limitations, the Scoping Plan provides helpful context. The Cap-and-Trade Program covers about 80 percent of all GHG emissions in California.<sup>10</sup> Crucially, just because emissions are "covered" by Cap-and-Trade does not mean all of those emissions from any particular covered entity are mitigated or reduced. It simply means they are included in the cap.

<sup>9</sup> SB 375 (Steinberg, Statutes of 2008).

<sup>10</sup> Scoping Plan at ES16.

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Thirty-nine percent of California's GHG emissions come from the transportation sector, including logistics-related transportation (like the WLC would involve).<sup>11</sup> Another 19 percent of the state's GHG emissions comes from electricity generation.<sup>12</sup> In addition to Cap-and-Trade, the Scoping Plan includes various other CARB measures, some of which also address transportation and electricity sector emissions, including SB 350, the Low Carbon Fuel Standard, the Mobile Source Strategy, and the Sustainable Freight Action Plan. In addition to the other complementary Scoping Plan measures, the Scoping Plan also clearly states that "[l]ocal government efforts to reduce emissions within their jurisdiction are critical to achieving the State's long-term GHG goals."<sup>13</sup>

The RFEIR's GHG methodology departs from this science, and has enormous implications for other projects across the state: it would amount to a determination that massive logistics centers, sprawling far-flung residential developments, and other types of remote greenfield development need not do anything to address and mitigate their GHG emissions because those emissions are already "taken care of" by the Cap-and-Trade Program. This is simply not true.

**B. The Cap-and-Trade Regulation Is Not Intended to Bear the Burden of Achieving the State's Transportation and Energy Sector GHG Goals Alone.**

Cap-and-Trade is not intended to achieve California's climate goals on its own. Rather, Cap-and-Trade is designed to motivate behavior by capping and pricing carbon at the regulated entity level – that is, at the industrial facility and fuel/energy supplier level. It does not send a direct price signal to developers of land use or logistics projects. This means, if CEQA and other "checks" on unsustainable development are weakened as the WLC analysis proposes, such development would simply continue without direct cost to the developers, while adding market demand without mitigating the WLC's emissions.

Moreover, if land use development does not account for GHG emissions, more and more of our state's carbon "cap" would be taken up by increasing transportation emissions. Developers do not receive a price signal from Cap-and-Trade, meaning that there will be no clear incentive to alter this pattern, even as it impacts the Cap-and-Trade system. Thus, the prices of compliance instruments under the Cap-and-Trade Program would increase at a higher rate than was contemplated when CARB developed the Cap-and-Trade Program. This would eventually cause a greater cost burden than

<sup>11</sup> As noted above, transportation-related GHG emissions have increased, from 37% in 2015, to 39% in 2016. See CARB, *California Greenhouse Gas Emissions for 2000 to 2016, Trends of Emissions and Other Indicators* (July 2018) at 1 (available at [https://www.arb.ca.gov/cc/inventory/pubs/reports/2000\\_2016/ghg\\_inventory\\_trends\\_00-16.pdf](https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2016/ghg_inventory_trends_00-16.pdf)); see also Scoping Plan at ES1.

<sup>12</sup> Scoping Plan at ES1.

<sup>13</sup> Scoping Plan at 69.; see also page 101.

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anticipated, and it would be borne by all Californians rather than dealt with during the project design phase. Properly-designed local policies, by contrast, may account for GHG emissions of development in a direct way—which furthers the equity objectives of AB 32, complements Cap-and-Trade, and better achieves California's climate goals.

C. There Is No Substantial Evidence Showing that the Project's Transportation and Electricity Related Emissions Would Actually Be Mitigated.

In the face of these substantial difficulties, the RFEIR does not articulate substantial evidence demonstrating a rational connection to the Cap-and-Trade Program – and that connection is badly attenuated, as we have explained. The project developer in this instance is claiming it may do nothing with regard to fuels and electricity, and will rely on reductions other entities may achieve. This is not the tight evidentiary connection required by the Supreme Court and by CEQA, and it is not consistent with the State's GHG reduction programs.

The Final Statement of Reasons (FSOR) prepared when section 15064.4 of the CEQA guidelines, concerning GHGs, was promulgated demonstrates that to properly rely on subsection (b)(3), concerning compliance with statewide programs, a project must demonstrate *with evidence in the record* how the regulations of GHG emissions would actually address the emissions that result from the project. That document states:

Reading section 15064.4 together with 15064(h)(3), however, to demonstrate consistency with an existing GHG reduction plan, a lead agency would have to show that the plan actually addresses the emissions that would result from the project. *Thus, for example, a subdivision project could not demonstrate consistency with the ARB's Early Action Measures because those measures do not address emissions resulting from a typical housing subdivision.* (ARB, Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration, October 2007; see also State CEQA Guidelines, §§ 15063(d)(3) (initial study must be supported with information to support conclusions), 15128 (determination in an EIR that an impact is less than significant must be briefly explained).)<sup>14</sup>

Here, there is no evidence in the RFEIR regarding who is responsible for complying with Cap-and-Trade for all the GHG emissions at issue in this case – and it certainly is not the project itself. The project is a logistics facility, with trucks involved in interstate commerce, and it is not covered by that Program. Indeed, there is no basis for the

<sup>14</sup> See Natural Resources Agency, Final Statement of Reasons for Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97 (December 2009) at 27 (emphasis added).

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RFEIR's conclusion that the fuel for all of the vehicles serving the project would be covered under the Cap-and-Trade regulation, since it is not clear that all of these vehicles would even purchase their fuel in California.

D. The Project Fails to Account for the Duration of the Project Compared to the Duration of the Cap-and-Trade Program.

The RFEIR states the project's buildout year is 2035,<sup>15</sup> yet the GHG analysis seems to stop after 2035. This raises multiple problems for the RFEIR analysis.

First, it is unclear why the analysis stops at buildout, when GHG emissions (and other environmental impacts) would continue into the indefinite future – at their highest levels – once full operations begin. Without further analysis throughout the project's anticipated life (which does not appear to be stated in the RFEIR but, presumably, would be at least 30 years after buildout), the analysis is incomplete and dramatically understates the project's GHG emissions. This also means the project would likely place a much higher burden on the Cap-and-Trade program than disclosed in the RFEIR – a burden that, as described above, is pushed onto all Californians instead of the project developer as a result of the project's failure to mitigate the vast majority of its GHG emissions.

Second, the RFEIR fails to account for, or even consider, the fact that the current Cap-and-Trade regulation extends only to 2030 – which is five years *before* the project's full buildout is achieved. This means that the RFEIR has no plan whatsoever to account for its GHG emissions once the project is fully built out. The RFEIR also does not address the inconsistency between the project's GHG emissions and Executive Order S-03-05, which, among other things, establishes a state GHG reduction target to reduce GHG emissions to 80 percent below 1990 levels by 2050.<sup>16</sup> The California Supreme Court has emphasized the importance of California's GHG targets in selecting appropriate CEQA thresholds.<sup>17</sup> Despite these considerations, there is no substantial evidence in the record to ensure that any of the project's post-buildout operational emissions are mitigated by the Cap-and-Trade program.

E. The Project Fails to Include a Backstop In Case Cap-and-Trade is Altered.

<sup>15</sup> Revised FEIR at 3-1.

<sup>16</sup> See Governor's Executive Order No. S-03-05 (June 1, 2005) (available at [http://static1.squarespace.com/static/549885d4e4b0ba0bf5dc695f/54d7f1e0e4b0f0798cee3010/1423458304744/California+Executive+Order+S-3-05+\(June+2005\).pdf](http://static1.squarespace.com/static/549885d4e4b0ba0bf5dc695f/54d7f1e0e4b0f0798cee3010/1423458304744/California+Executive+Order+S-3-05+(June+2005).pdf)); see also Governor's Executive Order No. B-30-15 (April 29, 2015) (available at <https://www.gov.ca.gov/2015/04/29/news18938/>).

<sup>17</sup> See *Cleveland Nat'l Forest Found. v. San Diego Assn. of Governments* (2017) 3 Cal.5th 497 at 516-519.

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In addition to its other evidentiary flaws, the RFEIR does not analyze how the analysis would change, and how the project's significant GHG impacts would be mitigated, if Cap-and-Trade were revised in a way that affects the state's GHG levels. In other words, the RFEIR's approach puts an almost complete reliance on the Cap-and-Trade Program in ways that, if adopted generally, would considerably affect the Program, and then fails to consider the possibility that the Program might change even as the Project continues to exist. This could include, for example, a scenario in which:

- The Cap-and-Trade program ceased to exist, or
- If the scope of the program were limited to exclude fuels and electricity, or
- If the Legislature or other factors required the program to be amended in a way that allows a higher cap.

Rather than anticipating any of these or other potential contingencies and building in an appropriate backstop to ensure the project's GHG emissions are mitigated below significance, the RFEIR instead blindly relies on the current Cap-and-Trade Program, with no further commitments or requirements. As a result, the RFEIR fails to provide substantial evidence supporting its conclusion that the project will result in less than significant GHG emissions, while forwarding an analysis that, if accepted, would make the state significantly less able to address climate change impacts resulting from its built infrastructure.

### III. The RFEIR is Inconsistent with CEQA Requirements.

The RFEIR's multiple errors with regard to the Cap-and-Trade Program render it contrary with CEQA law. The RFEIR misapplies the key CEQA Guideline, section 15064.4(b), which provides in pertinent part:<sup>10</sup>

- (b) A lead agency should consider the following factors, *among others*, when assessing the significance of impacts from greenhouse gas emissions on the environment:
1. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
  2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
  3. 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 greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and

<sup>10</sup> CEQA Guidelines § 15064.4(b) (emphasis added).



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must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. *If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.*

Thus, the CEQA Guidelines focus on project-level compliance and project-level impacts. State programs are available for consideration, but they are not held out as a panacea, for GHGs any more than for any other resource area.

Yet, the RFEIR relies upon subsection (b)(3) of this provision to claim that emissions which are indirectly included under the "cap" created by the Cap-and-Trade Program (referred to in the RFEIR as "capped emissions") need not be analyzed and mitigated under CEQA. This approach would excuse all of the WLC's transportation and electricity related emissions, leaving the project only "on the hook" for analyzing and mitigating a tiny fraction of its emissions. The following sections explain why this approach is legally and factually flawed.

A. Subsection (b)(3) Itself Does Not Allow The Approach Used in the Revised Final EIR.

As noted above, subsection (b)(3) of CEQA Guidelines section 15064.4 can be used as a factor to assess GHG significance when "*the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions...*" Here, the RFEIR concedes that the project is not subject to the Cap-and-Trade Regulation.<sup>19</sup> This in itself should be sufficient to demonstrate that subsection (b)(3) is inapplicable to the project, as "the project" does not "comply" with Cap-and-Trade at all.

B. The RFEIR's Hybrid Approach Used To Determine Significance Is Not Allowed.

In addition to improperly relying on subsection (b)(3), as described above, the RFEIR improperly attempts to create a "hybrid" significance scheme based on selectively combining subsection (b)(3) with the South Coast Air Quality Management District's (SCAQMD) bright-line threshold. As explained in the RFEIR, a potentially appropriate significance threshold in this case is the SCAQMD's 10,000 metric ton threshold.<sup>20</sup> The problem here is that the RFEIR does not compare the project's GHG emissions against this 10,000 metric ton threshold, and then mitigate those emissions to below that threshold to the extent feasible. Rather, the RFEIR simply subtracts from its emissions quantifications any GHG emissions that it deems to be "capped," and compares only the net "non-capped" emissions against the bright-line threshold.

<sup>19</sup> See page 4.7-4.

<sup>20</sup> RFEIR at 4.7-21.

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This approach is unsupported in law. Regardless of which threshold applies, CEQA requires lead agencies to "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project."<sup>21</sup> CEQA then provides that the lead agency must consider "whether *the project emissions* exceed a threshold of significance the lead agency determines applies to the project."<sup>22</sup> Thus, even if subsection (b)(3) properly applied here (which it does not, as explained above), nothing in the CEQA Guidelines allows this hybrid approach of cherry-picking what emissions are applied to an otherwise-applicable bright-line threshold. The City has not even attempted to satisfy its burden of providing such substantial evidence. As noted elsewhere in this letter, Cap-and-Trade does not result in ton-for-ton mitigation of each metric ton covered by the program. Rather, it is a declining market-wide cap designed to achieve certain statewide goals – which, as explained elsewhere in this document, is not designed to mitigate all GHG emissions from land use and logistics facilities.

Because the REFIR fails to properly apply the vast majority of the project's GHG emissions to the applicable bright-line significance threshold, it also fails to mitigate those emissions, as it simply dismisses them as "less than significant". If the full scope of the GHG emissions attributable to the project were compared to the applicable bright-line threshold, the mitigated emissions would still be substantially over the threshold. CEQA requires that the project's significant GHG emissions must be mitigated to the extent feasible. Additional mitigation measures are available to further reduce the project's GHG emissions that were not considered due to the inappropriate exclusion of the majority of project-generated emissions from the analysis.

#### C. Reliance Upon *AIR v. Kern County* Is Improper.

While the RFEIR provides little support for the GHG significance approach it takes, the briefing for *Paulek* further explains the reasoning behind the project's GHG analysis. In those briefs, attorneys for the developer claim that an unrelated appellate ruling, the *AIR v. Kern County* decision<sup>23</sup> is relevant. That decision concerned CEQA analyses for sources actually covered by the Cap-and-Trade Regulation, but the claim is that it somehow applies not only to GHGs from projects that are directly subject to the Cap-and-Trade Regulation, but also to all transportation and electricity related GHG

<sup>21</sup> CEQA Guidelines § 15064.4(a).

<sup>22</sup> CEQA Guidelines § 15064.4(b)(2).

<sup>23</sup> *Association of Irrigated Residents v. Kern County Board of Supervisors* (2017) 17 Cal. App. 5<sup>th</sup> 708. In CARB's view this case was wrongly decided as to the Cap-and-Trade issue, and it is certainly not apposite in this very different context.

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emissions, the logic being that those emissions are technically included in the statewide "cap" on emissions. This is incorrect factually, for all the reasons discussed above.

It is also not a controlling case legally. The holding in *AIR v. Kern County* addressed whether it "is appropriate for a lead agency to conclude a *project compliance* [sic] with the cap-and-trade program provides a sufficient basis for determining the impact of the project's greenhouse gas emissions will be less than significant."<sup>24</sup> The project at issue in that case was a refinery that was directly subject to the Cap-and-Trade Regulation. The court did not address the broader question of whether *all* GHG emissions from resources that are indirectly covered by Cap-and-Trade, at some undefined upstream point, may be cast aside as less than significant. Here, as noted above, the WLC is *not* subject to the Cap-and-Trade regulation. It therefore does not "comply" with the Cap-and-Trade program, and is distinguishable from the project at issue in *AIR v. Kern County*.

C. Reliance Upon Obscure 2013 Negative Declarations and a Policy Document from Another District Is Similarly Uncompelling.

The RFEIR itself also attempts to justify excluding "capped emissions" from its significance analysis by referencing two seemingly cherry-picked 2013 mitigated negative declarations,<sup>25</sup> and one 2014 guidance document from the San Joaquin Valley Air Pollution Control District (SJVAPCD) titled Policy APR-2025. The RFEIR does not explain why it chose to follow the methodology allegedly used in two obscure mitigated negative declarations and in a 2014 policy document from an air district in a different air basin, rather than following traditional CEQA GHG analysis and mitigation principles. Furthermore, the primary SJVAPCD guidance documents regarding analyzing and mitigating GHG emissions under CEQA make no mention of Policy APR-2025, including the guidance documents relied upon in the *AIR v. Kern County* decision.<sup>26</sup>

To the extent the RFEIR is considering what other air districts have done, it is worth noting that the California Air Pollution Control Officers' Association (CAPCOA) has considered a range of potential CEQA significance thresholds, none of which summarily

<sup>24</sup> *AIR v. Kern County* at 743 (emphasis added).

<sup>25</sup> The Revised FEIR only cryptically references these MNDs, without citations or links to the documents, and without any other information explaining the basis for their CEQA significance approach. The RFEIR's failure to include or adequately reference these mitigated negative declarations hampers the public's ability to review and comment on the RFEIR.

<sup>26</sup> See, e.g., *AIR v. Kern County* at 743-744; see also [http://www.valleyair.org/transportation/GAMAQI\\_3-19-15.pdf](http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf); [http://www.valleyair.org/transportation/GAMAQI\\_3-19-15.pdf](http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf); and <http://www.valleyair.org/Programs/CCAP/12-17-09/3%20CCAP%20-%20FINAL%20LU%20Guidance%20-%20Dec%2017%202009.pdf>.

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exclude emissions that are indirectly included within the Cap-and-Trade program.<sup>27</sup> While that document was generated in 2008, it makes multiple references to the Cap-and-Trade program, and does not endorse simply subtracting all so-called "capped emissions" from GHG analyses.

D. Even If CEQA Guideline 15064.4(b)(3) Applied Here, The RFEIR Ignores Other Requirements in the CEQA Guidelines.

The sections above provide in-depth analysis regarding why subsection (b)(3) of CEQA Guideline 15064.4 does not allow this project to simply disregard the vast majority of its GHG emissions. Even if that subsection did apply, there are other deficiencies in the RFEIR's GHG analysis that must be addressed.

First, the CEQA Guidelines make clear that an agency cannot focus solely on a single significance consideration while ignoring other evidence or indicators showing potentially significant impacts. For example:

- Section 15064.4(b) states that "[a] lead agency should consider the following factors, *among others*, when assessing the significance of impacts from greenhouse gas emissions on the environment."
- Section 15064.4(b)(3) provides in pertinent part: "If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project."
- Section 15064(h)(3) provides: "If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project."

As discussed in depth above, there is evidence in this record showing significant GHG impacts that were not analyzed or mitigated in the RFEIR. CEQA does not allow these impacts to be overlooked, even if the lead agency believes the project's GHG emissions would be less than significant under one particular (and here, improper) significance metric.

**IV. Criteria Pollutants and Toxic Emissions Must Still Be Considered**

In its 2013 and 2015 comment letters, CARB noted its substantial concerns regarding the project's air pollutant and toxics emissions, and suggested several feasible means of reducing the significant impacts from those emissions. These emissions raise

<sup>27</sup> See CAPCOA, CEQA & Climate Change (January 2008). Available at <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf>.


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substantial local exposure and environmental justice concerns, as Moreno Valley already suffers from very substantial air pollution exposures. These exposures would likely be worsened without appropriate mitigation measures.<sup>28</sup> CARB incorporates the comments from those letters into this letter by reference, and strongly recommends that the RFEIR be revised to incorporate all mitigation recommended in its 2013 and 2015 comment letters.

#### V. Conclusion

While the WLC has enormous GHG implications in itself, the attention this project has received, and the recent legal developments in the emerging *AIR v. Kern County* and *Paulek* line of cases, demonstrate that the City's decisions in the RFEIR have implications beyond the WLC project as well. The City should revise its GHG analysis to accurately account for all GHG emissions that would result from the project, apply those emissions against the applicable significance threshold identified in the RFEIR, and adopt feasible mitigation to ensure those emissions would not cause significant impacts, as required by CEQA.

Sincerely,



Richard W. Corey  
Executive Officer

<sup>28</sup> On these issues of acute local exposure, especially to roadway emissions, and the importance of fully addressing these sources of risk, see Ann Carlson, *The Clean Air Act's Blind Spot: Microclimates and Hotspot Pollution* (2018) 65 UCLA L. Rev. 1036.

LETTER

RESPONSE

EXHIBIT C



Gavin Newsom, Governor  
 Jared Blumenfeld, CalEPA Secretary  
 Mary D. Nichols, Chair

January 30, 2020

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**Re: World Logistics Center Draft Recirculated Revised Sections of the Final Environmental Impact Report (SCH # 2012021045)**

Dear Mr. Armijo:

The California Air Resources Board (CARB) has reviewed the Draft Recirculated Revised Sections of the Final Environmental Impact Report (RRSFEIR) for the World Logistics Center (WLC or Project). CARB appreciates the opportunity to comment on the RRSFEIR, and raises two primary issues with the RRSFEIR in this letter.

**1. The RRSFEIR contains the same flawed GHG analysis as the RFEIR.**

CARB previously reviewed the City's July 2018 Revised Final Environmental Impact Report (RFEIR), and submitted comments regarding the RFEIR on September 7, 2018. As noted in that comment letter, CARB believes the RFEIR's analysis of greenhouse gas (GHG) related impacts does not meet California Environmental Quality Act (CEQA) requirements, as it relies almost entirely on mischaracterizations to reach its less-than-significant impact determination.

Unfortunately, the flaws described in CARB's September 7, 2018 comment letter remain in the RRSFEIR, which continues to rely upon mischaracterizations regarding California's Cap-and-Trade Program to dismiss any serious analysis or mitigation of the Project's GHG emissions. Therefore, as part of its comments on the current draft RRSFEIR, CARB re-submits its September 7, 2018 comment letter (attached to this letter) in its entirety. CARB directs its comments toward both the direct and cumulative impact analysis sections in the RRSFEIR.

**2. The RRSFEIR does not include the new GHG mitigation measures it references.**

The RRSFEIR includes passing references to new GHG-related mitigation measures, particularly measures 4.7.6.1E-1 and 4.7.6.1E-2 (see pages 4.7-20, 6.7-14, and 6.7-20). However, it appears the measures themselves have not been included in the RRSFEIR. Without the ability to review the mitigation measures relied upon by the City in reaching its significance determinations, the public has no way to evaluate the effectiveness of those measures, thwarting CEQA's public disclosure purpose.

LETTER

RESPONSE

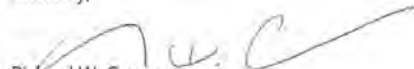
Mr. Albert Armijo  
January 30, 2020  
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**Conclusion**

Both this comment letter and CARB's September 7, 2018 comment letter set forth substantial deficiencies in the environmental analysis prepared for the WLC project. Given these deficiencies, the City should revise the RRSFEIR to include adequate analysis and mitigation regarding all of the Project's environmental impacts, including GHG, air quality, and cumulative impacts. The City should then re-circulate the document for public review to allow the public to review and comment on the City's revised proposal.

Thank you for your consideration. As always, we welcome any questions from the City regarding ways to adequately analyze and mitigate the Project's GHG emissions.

Sincerely,

  
Richard W. Corey  
Executive Officer

Enclosure: CARB's September 7, 2018 comment letter regarding the WLC RFEIR.



LETTER

RESPONSE

EXHIBIT D

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA  
FOURTH APPELLATE DISTRICT, DIVISION TWO

ALBERT THOMAS PAULEK, et al.,  Plaintiffs and Respondents,  v.  MORENO VALLEY COMMUNITY SERVICES DISTRICT, et al.,  Defendants and Appellants.  HF PROPERTIES, et al.,  Real Parties in Interest and Appellants.
LABORERS INTERNATIONAL UNION OF NORTH AMERICA, LOCAL 1184, et al.,  Plaintiffs and Appellants,  v.  MORENO VALLEY COMMUNITY SERVICES DISTRICT, et al.,  Defendants and Respondents.  HF PROPERTIES, et al.,  Real Parties in Interest and Respondents.

Case No. E071184  
(Riverside Cty.  
Super. Ct. No.  
RIC 1510967 MF,  
RIC 1511279, RIC 1511327,  
RIC 1511421, &  
RIC 1511195)

(Riverside Cty. Super. Ct.  
No. RIC 1511279 &  
RIC 1511327)

Riverside County Superior Court  
The Honorable Sharon J. Waters, Judge

BRIEF OF AMICI CURIAE THE ATTORNEY GENERAL AND THE  
CALIFORNIA AIR RESOURCES BOARD IN SUPPORT OF PLAINTIFFS  
AND RESPONDENTS ALBERT THOMAS PAULEK, ET AL. AND  
PLAINTIFFS AND APPELLANTS LABORERS INTERNATIONAL UNION  
OF NORTH AMERICA, LOCAL 1184, ET AL.

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INTRODUCTION

The massive World Logistics Center (Project) will cause approximately 70,000 daily truck trips transporting goods from the ports of Long Beach and Los Angeles to Moreno Valley. (AR 003039, 058605-06.) These vehicle trips will emit hundreds of thousands of metric tons of greenhouse gas (GHG) emissions every year over the life of the Project. (AR 002729.) These GHG emissions, along with emissions from electricity needed to power the more than 40-million-square-foot project, will add to the existing climate pollutant problem, accumulating in the atmosphere and persisting for decades or longer.

Rather than analyzing and mitigating the Project's emissions, lead agency Respondents Moreno Valley Community Services District, et al. (Respondents) shirk their responsibility as a local government to address climate change. They improperly rely on CARB's statewide Cap-and-Trade climate program (Cap-and-Trade Program), which does not impose any regulatory requirements on this Project, as an excuse not to analyze and mitigate the Project's climate change impacts. Respondents improperly ignore roughly 95% of the GHG emissions from the Project (AR 002718-19), disregarding the significance of those emissions, avoiding their duty to adopt all feasible mitigation measures, and failing to properly disclose their responsibility for this pollution to the public.

Respondents' approach mischaracterizes the way state climate policies work and violates the California Environmental Quality Act (CEQA). CEQA directs that Respondents take "all action necessary" to protect the environment, recognizing the importance of local action driven through "meaningful" consideration of environmental impacts. (See Pub. Resources Code, §§ 21000, 21001, 21002, 21002.1.) CEQA does not allow Respondents to waive their CEQA obligations by pointing to a regulation that does not bind them (Cal. Code Regs., tit. 14, § 15000 et seq. (CEQA

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Guidelines), § 15064.4), and Respondents wholly misconstrue the regulatory scheme they seek to use.

Although Respondents claim their approach is consistent with state climate policy, it is not. (See Plaintiffs/Appellants' Supplemental Request Regarding Judicial Notice, Exhibit 1, California Air Resources Board, California's 2017 Climate Change Scoping Plan (Nov. 2017) (2017 Scoping Plan) at pp. 19 ["Local actions are critical for implementation of California's ambitious climate agenda"]; 97-99 [more extensive discussion about the need for local action to achieve California's climate goals]; see also Health & Saf. Code, §§ 38502, subd. (h) [identifying competing priorities to balance in emissions reductions], 38592 [nothing in this division relieves any person, entity, or agency of compliance with other law], 38690 [identifying overlapping automobile emissions policy].) Respondents' approach has been repudiated by CARB, the Attorney General's Office, and the Natural Resources Agency, as contrary to critical state climate goals. The state has long—and expressly—relied on a portfolio of climate change measures, including significant efforts by local governments, to address emissions that result from their land use decisions.

Respondents rely on the Cap-and-Trade Program to excuse their obligation to make better land use decisions. Cap-and-Trade is not intended as a stand-alone climate policy; instead, it assumes steady efforts to reduce emissions across the state. While Cap-and-Trade has an important role to play in limiting emissions from entities like power plants and refineries, the Program does not cover a host of other sources, including warehouses. Although the Program creates financial and legal obligations on fuel suppliers and electricity generators that may ultimately supply this Project, the Project experiences neither the direct legal requirements of the Program nor the full economic costs associated with its additional emissions. If projects were allowed to evade responsibility in

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this way, they would steadily increase Cap-and-Trade Program costs upstream, while locking the state into ever-more expensive and inappropriate high-emitting development patterns. This is a recipe for failure in achieving the state's climate goals. To avoid this scenario, the state relies on local governments to limit emissions from new development projects. Emissions from such projects are the responsibility of local governments and should be mitigated through the proper application of CEQA. Eliminating this crucial piece of the state's portfolio approach undermines the state's climate goals.

We have arrived at a crossroads for the future of GHG analysis under CEQA. If Respondents prevail, this case could singlehandedly undo the will of the Legislature by excusing essentially all projects from the obligation to consider GHG impacts from vehicle trips and energy use. This Court should reject Respondents' argument and confirm that all lead agencies must do their part if we are to meet the state's long-term climate stabilization objective.

**STATEMENT OF INTERESTS**

**I. INTEREST OF THE ATTORNEY GENERAL**

California has already begun to experience significant adverse impacts from climate change such as "more frequent, more catastrophic and more costly" wildfires, drought, "coastal erosion, disruption of water supply, threats to agriculture, spread of insect-borne diseases, and continuing health threats from air pollution." (2017 Scoping Plan at p. ES2.) As California's chief law enforcement officer, the Attorney General has the independent power and duty to protect the interest of all of California's current and future residents in a clean, health, and safe environment. (See Cal. Const., art. V, § 13; Gov. Code, §§ 12511, 12600-12612; *D'Amico v. Bd. of Medical Examiners* (1974) 11 Cal.3d 1, 15.)

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Upholding this duty, the Attorney General has actively encouraged lead agencies to fulfill their CEQA responsibilities as they relate to climate change for well over a decade. (See, e.g., *Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 3 Cal.5th 497 (*SANDAG*) at p. 519 [“nothing we say today invites regional planners to ‘shirk their responsibilities’ under CEQA”]; *City of Long Beach v. City of Los Angeles* (2018) 19 Cal.App.5th 465; *People v. County of San Bernardino* (San Bernardino County 2007) No. CIVSS0700329.)

The World Logistics Center, like every large development project, has the potential to either facilitate or hinder the state’s achievement of its climate goals. Here, Respondents’ unsupported approach to analyzing the Project’s GHG emissions has the potential to seriously undermine the overall effort to meet the state’s science-based GHG reduction goals for the transportation and land use sectors and to disproportionately affect environmental justice communities.<sup>1</sup> Given these significant interests, the Attorney General submits this amicus brief in support of Appellants,<sup>2</sup> in compliance with rule 8.200(c)(7) of the California Rules of Court in his independent capacity and on behalf of the California Air Resources Board (CARB).

<sup>1</sup> The Attorney General opposed this methodology in a comment letter it submitted on the revised sections of the Final EIR for this Project (Revised Final EIR or RFEIR). (Letter re: Revised Sections of the Final Environmental Impact Report for the World Logistics Center Project, Sept. 7, 2018, at: <<https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/comments-revised-sections-feir.pdf>>.) The Revised Final EIR is not at issue in this litigation, but it includes the original EIR’s same flawed GHG analysis.

<sup>2</sup> This brief is submitted in support of Plaintiffs and Respondents Albert Thomas Paulek, et al. and Plaintiffs and Appellants Laborers International Union of North America, Local 1184, et al.

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**II. INTEREST OF THE CALIFORNIA AIR RESOURCES BOARD**

CARB has a strong interest in participating in this case as amicus curiae. CARB is charged with protecting the public from the harmful effects of air pollution and developing programs and actions to fight climate change. As creator and administrator of the Cap-and-Trade Program, and as the lead agency on the Scoping Plan setting out many of the state’s climate policies, CARB is an expert on how the Cap-and-Trade Program was designed to function and interact with other state laws and programs as part of California’s portfolio approach to addressing GHG emissions. In their briefing, Respondents misrepresent CARB as effectively endorsing the EIR’s approach to GHG analysis. (Combined Respondents’ and Cross-Appellants’ Opening Brief at pp. 17, 36–38, 47–48, 56, 63.) But CARB has repeatedly made clear it does *not* support Respondents’ approach.<sup>3</sup> As explained more fully below, Respondents’ arguments regarding GHG analysis are contrary to the construction given to applicable regulations by CARB, and by the Natural Resources Agency, agencies charged with interpreting and enforcing the programs at issue.

**BACKGROUND**

**I. LEGAL BACKGROUND REGARDING CALIFORNIA’S EFFORTS TO COMBAT CLIMATE CHANGE**

In 2006, recognizing the importance of combatting climate change and furthering the objectives of Executive Order S-3-05, the Legislature enacted the Global Warming Solutions Act of 2006, commonly known as

<sup>3</sup> CARB also explained this approach when it formally opposed the GHG analysis Respondents rely on here through its comments on the RFEIR for this Project. (Letter re: World Logistics Center Revised Final Environmental Impact Report, Sept. 7, 2018, at: <[https://ww3.arb.ca.gov/toxics/tdeceqalist/logisticsfeir.pdf?\\_ga=2.236813640.855160185.1575908432-1460774677.1564163003](https://ww3.arb.ca.gov/toxics/tdeceqalist/logisticsfeir.pdf?_ga=2.236813640.855160185.1575908432-1460774677.1564163003)>.)

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AB 32. (Health & Saf. Code, § 38500, et seq.) AB 32 mandates that, by 2020, California must reduce its total statewide annual GHG emissions to the level they were in 1990, and to 40 percent below that level by 2030. (Health & Saf. Code, §§ 38550, 38566.) This mandate puts the state on a trajectory of significant and continuous GHG emissions reductions through 2050, in order to stabilize the atmospheric levels of GHGs and reduce the risk of dangerous climate change.

Under AB 32, the Legislature tasked CARB with preparing a guidance planning document, known as the Scoping Plan that, while not binding, set out the state’s views based on extensive environmental and economic analyses on how policies may be effectively implemented so that California will meet the its ambitious GHG reduction goals. (See Health & Saf. Code, §§ 38561 et seq.) The Scoping Plan emphasizes the need for a multi-pronged emissions reduction approach that can be carried out by many entities and reflects the state’s position that it is necessary to reduce emissions at the source and through reductions in demand for energy. (2017 Scoping Plan, pp. 12, 19, 28).

The Scoping Plan includes a suite of regulations, measures, and policies designed to operate together to reduce GHG emissions. The Cap-and-Trade Program is one such policy. Entities that are directly subject to the Cap-and-Trade Program—like power plants, factories, refineries, and electricity generators and importers—must purchase and surrender compliance instruments (e.g., allowances) for their emissions. (See Cal. Code Regs., tit. 17, § 95812.) Downstream emitters such as cars and trucks, much less warehouses that such cars and trucks drive to, are not covered entities under Cap-and-Trade and have no such obligation to purchase or surrender allowances. The existence of the Program, in other words, does not obviate the need for action at other levels of the economy. On the contrary: If sources like the long-lasting development project in this

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case build without regard to their emissions, they will increase overall state emissions and hence increase pressure and costs within the Cap-and-Trade Program.

To address the wide range of GHG emissions sources that are not directly controlled through the Cap-and-Trade Program, the state relies on other policies<sup>4</sup>—many of which require collaboration between the state and local governments. Agencies large and small across the state (including, crucially, cities and counties) are responsible for ensuring that proposed new land use plans, transportation projects, and development projects are consistent with evolving scientific knowledge and state regulatory schemes; CEQA is a critical tool for implementing these obligations.<sup>5</sup> (See *SANDAG, supra*, 3 Cal.5th at p. 519; see also CEQA Guidelines, § 15064.4, subd. (b).)

The Scoping Plan makes clear that the Cap-and-Trade Program was *not* designed to replace local governments’ long-term planning obligations, but rather designed to work in concert with those policies to achieve the

<sup>4</sup> See, e.g., Health & Saf. Code, §§ 38561, subd. (e) (requiring CARB to consider “the relative contribution of each source or source category to statewide greenhouse gas emissions”), 43018.5, subd. (a) (requiring CARB to “adopt regulations that achieve the maximum feasible and cost-effective reduction of greenhouse gas emissions from motor vehicles”).

<sup>5</sup> For example, CARB provides regional emission reduction targets for local jurisdictions’ land use and transportation planning obligations under Senate Bill (SB) 375. (See Health & Saf. Code, § 65080, subd. (b)(2)(A) [known as “The Sustainable Communities and Climate Protection Act”].) CARB also works with regional air pollution control districts and air quality management districts to address emission sources that have both local and global effect, including methane from landfills and hydrofluorocarbons (HFCs), as well as to support state- and federally-mandated permitting of certain industrial sources of GHG emissions. (See California Air Resources Board, California’s 2017 Climate Change Scoping Plan (Nov. 2017) pp. 3, 104 <[https://ww3.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf)>.)

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state’s goals. (2017 Scoping Plan at p. 102 [“California’s future climate strategy will require increased focus on integrated land use planning”].)

Recent state reports have shown that California’s vehicular GHG emissions continue to increase year after year, and CARB has emphasized the need for local action. (See California Air Resources Board, 2018 Progress Report: California’s Sustainable Communities and Climate Protection Act (November 2018) at 4.) These increasing emissions demonstrate the crucial need for *more* complementary local action—not less—to ensure the state meets its GHG targets in cost-effective ways.

In light of the state’s GHG reduction policies, and CEQA’s focus on embedding environmental considerations in local decision-making, the Supreme Court has emphasized that careful CEQA analysis of GHG impacts will be required going forward, as lead agencies must “stay in step” with the evolving science and law related to the state’s long-term climate objectives in order to carry out their duties under CEQA. (*SANDAG, supra*, 3 Cal.5th at p. 519.)

**II. OVERVIEW OF THE GHG ANALYSIS IN RESPONDENTS’ EIR**

Mischaracterizing the collaborative efforts required to combat climate change and the role of the Cap-and-Trade Program, Respondents’ EIR takes a very unusual and troubling approach to addressing the Project’s GHG-related impacts.<sup>6</sup> Respondents divide the Project’s GHG emissions into two categories, which the EIR terms “capped” and “uncapped.” (AR 002719.) What the EIR deems “uncapped” emissions constitute only about 4.6% of the Project’s emissions. (*Ibid.*) The “uncapped” category includes comparatively minor landfill emissions caused by waste generated at the

<sup>6</sup> The Attorney General and CARB only address Respondents’ inappropriate use of the Cap-and-Trade Program in the GHG analysis of the EIR. This amicus brief is not intended to and should not be construed as an exhaustive discussion of the EIR’s compliance with CEQA.

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Project and the use of refrigerants at the Project. (*Ibid.*) For these emissions, the EIR follows the approach that would be expected under CEQA: the City of Moreno Valley, in its discretion, designated a significance threshold (in this case, 10,000 metric tons of GHG emissions as recommended by the South Coast Air Quality Management District), compared the “uncapped” emissions to that threshold, and required feasible mitigation measures to ensure those emissions fall below that threshold. (AR 002719, AR 002729.)

What the EIR terms “capped” emissions, however, constitute the remaining 95.4% of the Project’s predicted emissions. (AR 002719.) Those include emissions caused by mobile sources (namely, diesel trucks), as well as natural gas and electricity use at the Project. (*Ibid.*) For these emissions, the EIR deviates dramatically from standard CEQA methodology. The EIR asserts these emissions are “covered” by Cap-and-Trade and therefore wholly exempt from any further CEQA analysis or mitigation. (AR 002723.) The EIR does *not* compare the Project’s “capped” emissions to the 10,000 metric ton threshold. (AR 002725.) Indeed, after mitigation measures are applied to the Project, the “capped” emissions remain nearly 40 times greater than the significance threshold. (AR 002729.) In forgoing any attempt to decrease the Project’s true total emissions to a less-than-significant level, Respondents fail to consider further mitigation measures that could have made this Project more compatible with the state’s climate goals. As described below, this approach is unlawful.

**ARGUMENT**

Respondents avoid disclosing and addressing mitigation for thousands of tons of GHG emissions each year pursuant to the misguided theory that those emissions are addressed by Cap-and-Trade. This argument is founded on misunderstandings of both the Cap-and-Trade Program and

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CEQA—both of which require different industries and projects to take responsibility for their own impacts, rather than rely on others for mitigation. Most fundamentally, warehouse projects like the Project are not subject to Cap-and-Trade. Respondents therefore cannot accurately assert that “compliance” with Cap-and-Trade provides any legal basis to avoid analyzing and adequately mitigating the majority of the Project’s emissions.

The CEQA Guidelines allow projects to consider regulations “[with] which the project complies” for purposes of considering significance of GHG emissions. (See CEQA Guidelines, § 15064.4, subd. (b)(3).)

However, that consideration does not apply here and Respondents’ approach, which in effect relies on other entities to undertake Respondents’ CEQA mitigation, not only violates both CEQA’s legal requirements and public disclosure and mitigation purposes, but also undermines the state climate objectives Cap-and-Trade is intended to further. Cap-and-Trade is designed to act in tandem with—not in spite of—critical tools like local land use planning to reduce GHG emissions. If allowed for Respondents and adopted by other local jurisdictions, such abdication by local governments would dramatically hinder the state’s ability to achieve its legislatively mandated long-term climate stabilization objectives and forgo pollution reduction co-benefits from GHG mitigation measures that are vital for environmental justice communities.

The Resources Agency agrees with CARB that “to demonstrate consistency with an existing GHG reduction plan, a lead agency would have to show that the plan actually addresses the emissions that would result from the project.” (See California Natural Resources Agency, Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97 (2009).

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<[http://resources.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf)>, at p. 27.)

**I. WAREHOUSE AND LOGISTICS PROJECTS ARE NOT REGULATED BY CAP-AND-TRADE AND THEIR EMISSIONS MUST STILL BE MITIGATED BY LOCAL GOVERNMENTS**

Warehouse and logistics complexes are not regulated by Cap-and-Trade. The Cap-and-Trade Program thus provides no legal or policy basis for Respondents to avoid their obligation to evaluate and mitigate GHG emissions. Cap-and-Trade applies “an aggregate greenhouse gas allowance budget [to] covered entities and provides a trading mechanism for” such allowances. (Cal. Code Regs., tit. 17, § 95801 (emphasis added).) Respondents seek to use Cap-and-Trade to zero-out and excuse the application of feasible mitigation measures to over 95% of all GHG emissions from the Project. Cap-and-Trade applies only to expressly identified entities (“covered entities”) such as cement producers, petroleum refiners, electricity generators, natural gas suppliers, fuel importers, and liquid petroleum gas suppliers. (Cal. Code Regs., tit. 17, § 95811.) Warehouse and logistics complexes are *not* covered entities. Cap-and-Trade compliance instruments do not factor in *whatsoever* because this Project is not covered by Cap-and-Trade.

The mere fact that warehouse and logistics complexes are in the chain of commerce with covered entities does not transform them into covered entities themselves. As an example, although the operator of a refinery that produces gasoline in California is subject to Cap-and-Trade, (Cal. Code Regs., tit. 17, § 95811, subd. (e)(1)), entities downstream from that refinery in the chain of commerce are not. The refinery itself may have compliance obligations under the Cap-and-Trade Program, which can be met by reducing the refinery’s own GHG emissions or surrendering allowances, but the gas station that resells the gas, the truck drivers who purchase it, and

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the warehouses to which the trucks drive do not have compliance obligations. Under the state's portfolio approach, while the refinery may have met some or all of its climate obligations via Cap-and-Trade, the downstream entities have not. Because warehouses receive no set price or regulatory signals from Cap-and-Trade, they are not being directly incentivized to reduce emissions. Instead, other components of the state's portfolio address those emissions. Nothing in Cap-and-Trade explicitly or impliedly repealed the use of other measures to address climate change; they were designed to work together. (See, e.g., 2017 Scoping Plan at p. 28.) Local governments must responsibly plan new development to further the state's climate goals.

**II. ALLOWING RESPONDENTS' UNTENABLE APPROACH TO GHG ANALYSIS WOULD HAVE SIGNIFICANT, NEGATIVE STATEWIDE CONSEQUENCES**

If Respondents' approach to GHG analysis is endorsed, other lead agencies will undoubtedly follow this approach, and emissions from the transportation and land use sectors will be largely omitted from analysis and mitigation under CEQA. Widespread adoption of this approach would: (1) place the entire burden of California's well-established, long-term land-use related GHG reduction goals on Cap-and-Trade, thereby straining the program beyond its intended purpose and (2) expose already burdened communities in the state to greater amounts of GHG emissions and co-pollutants that accompany GHG emissions, such as diesel particulate matter and nitrogen oxides.

**A. Respondents' GHG analysis undermines California's GHG reduction goals**

As explained above, the Cap-and-Trade Program is just one part of a suite of complementary measures designed to achieve California's ambitious GHG reduction and climate stabilization objectives. Cap-and-

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Trade provides no legal basis for Respondents to avoid local governments' obligations as lead agencies under CEQA to evaluate and mitigate GHG emissions from a project that the Cap-and-Trade Program does not even cover.

While any one policy may be insufficient or at risk of circumvention, the suite of policies work in concert toward the state's goals.<sup>7,8</sup> This overlap is by design, and makes the suite of policies more resilient to changed circumstances, enforcement problems, and legal challenges. The upstream Cap-and-Trade Program thus works in tandem with downstream choices, including planning choices, to ensure both that total emissions decline and that projects throughout the state are designed to avoid putting undue upstream pressure on emissions or control costs. Weakening one policy because another policy might address it runs contrary to this approach.

<sup>7</sup> See 2017 Scoping Plan, *supra*, pp. ES7-8, 10, 22, 97; cf. Elinor Ostrom, A Polycentric Approach for Coping with Climate Change (2014) 15 *Annals Econ. & Fin.* 97, 123 <<https://perma.cc/YSF4-B7N8>> (Nobel laureate describing an ideal policy approach to climate change as "Complex, Multi-Level Systems to Cope with a Complex, Multi-Level Problem"); Amir Bazaz, et al., Global Covenant of Mayors, Summary for Urban Policymakers: What the IPCC Special Report on Global Warming of 1.5°C Means for Cities (Dec. 2018) pp. 22-23 <<https://perma.cc/R37B-3WDD>> (identifying interaction between sources of governance and importance of incentives beyond financial consequences at the community level).

<sup>8</sup> Complementary measures are also important in light of the risk to any one measure posed by litigation. Private parties and the federal government have challenged California's GHG reduction policies, including aspects of the Cap-and-Trade Program. California's GHG vehicle emissions regulatory authority is currently also under challenge. The wisdom of the portfolio approach endorsed by the Scoping Plan is to ensure that the state's efforts continue via many channels, rather than relying on any one potentially challenged measure.

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If other lead agencies adopt Respondents’ approach to GHG analysis under CEQA, their development projects would produce millions of metric tons of GHG emissions that would go unmitigated through what amounts to an unauthorized categorical exemption from CEQA. The economic analyses and feasibility of achieving the state’s legislatively mandated goals in the Scoping Plan account for all policies working in tandem. If any one policy fails to deliver reductions, this would put strain on the Cap-and-Trade Program to deliver more reductions than anticipated and at higher costs.

Respondents’ failure to account for the significance of the Project’s GHG emissions from transportation is particularly troubling in light of the fact that the transportation sector accounts for over 35% of the state’s total GHG emissions and these emissions continue to rise. (2017 Scoping Plan, *supra*, pp. ESI, 11 [charts of emissions by source]; see also California Air Resources Board, 2018 Progress Report: California’s Sustainable Communities and Climate Protection Act (November 2018) at 4.) As the California Supreme Court noted, “transportation emissions are affected by the location and density of residential and commercial development, the Scoping Plan does not propose statewide regulation of land use planning but *relies instead on local governments*.” (*Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal.4th 204, 230; emphasis added.) Local governments thus play a unique role in decreasing GHG emissions from the transportation sector.

Respondents contend that because statewide emissions are capped under the Cap-and-Trade Program, the amount of emissions from “capped” sources will be the same with or without their Project, but this claim ignores both their obligations under CEQA to disclose and mitigate their emissions and the intended design of the Cap-and-Trade Program. (See

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Combined Respondents’ and Cross-Appellants’ Opening Brief at pp. 48–49.)

Cap-and-Trade is not a program designed to reduce emissions from local government actions, or land use; instead, it was designed on the assumption that local actors would simultaneously work to reduce emissions within their spheres. Cap-and-Trade alone was designed to account for less than 40% of the total emissions reductions needed to achieve California’s 2030 climate goals, and on the explicit assumption that local design choices would continue to reduce overall emissions (and hence economy-wide costs in the Cap-and-Trade Program). (2017 Scoping Plan at p. 28.) Indeed, relying entirely on the Cap-and-Trade Program to address land use would produce a mismatch that would strain the Program by functionally increasing demand for emissions reductions as unregulated entities displace their obligations onto the Program rather than taking action themselves, raising compliance costs for covered entities across all sectors and all consumers across the state at all income levels. California’s portfolio approach was designed to meet AB 32’s requirement that “greenhouse gas emissions reduction activities . . . adopted and implemented by [CARB] are complementary, nonduplicative, and can be implemented in an efficient and cost-effective manner.” (Cal. Health & Saf. Code, § 38561.) By taking a portfolio approach, the state has recognized that taking GHG action in specific sectors ensures that we achieve our broader climate and energy demand reduction goals. (See 2017 Scoping Plan at pp. 2, 24, 100 [describing Governor Brown’s five key climate change strategy “pillars”].) Ultimately, cost increases could make the Cap-and-Trade Program less effective as a key part of the suite of California’s climate policies.

In sum, Respondents’ position is fundamentally inconsistent with the state’s approach to climate change, and so disregards significant emissions

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that should properly be addressed under CEQA, not an unrelated emissions program like Cap-and-Trade. Moreover, Respondents' approach would allow similar emissions from other projects that would follow its lead. (See Part III(A), *infra*.) The majority of land use projects are, like this Project, not covered by the Cap-and-Trade Program. Freight alone is an enormous industry; over 1.5 billion tons of freight were moved in California during 2015. (*Id.* at p. 73.) And other types of projects such as residential developments or agricultural enterprises may seek to invoke precedent created by this case. Thus, even if the Project standing alone does not excessively strain the Cap-and-Trade system, the collective weight of new projects failing to address GHG emissions in the CEQA process would.

**B. Respondents' GHG analysis prevents co-pollutant reduction measures necessary to protect California's environmental justice communities**

Permitting massive land development projects without requiring the necessary mitigation measures to decrease project emissions will also harm California's environmental justice communities—those already suffering from the worst environmental pollution in the state. The census tract the Project will be built in is ranked in the 75th to 80th percentile of census tracts in California in terms of greatest pollution burden indicators and health and vulnerability factors for population characteristic indicators. (CalEnviroScreen 3.0 for Census Tract 6065042624, Office of Environmental Health Hazard Assessment, last visited November 27, 2019 <<https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30>>.) Even without the Project, residents of this census tract already experience ozone, the main ingredient of smog, at a rate higher than 98% of the rest of California. (*Ibid.*) Relatedly, these residents also experience cardiovascular disease, which can result from exposure to air pollution, at a rate higher than 95% of the state. (*Ibid.*)

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Considering additional mitigation properly may have resulted in additional zero-emissions technologies used for the Project, including, perhaps, from its trucks, as many commenters recommended. If such measures are not considered from this Project and other future projects like it are not mitigated, Moreno Valley and communities throughout the state will likely continue to suffer from worse air pollution. (See Nicky Sheats, *Achieving Emissions Reductions for Environmental Justice Communities Through Climate Change Mitigation Policy* (2017) 41 WM. & MARY ENVTL. L. & POL'Y REV. 377, 387 [“[E]ven without the intentional maximization of co-pollutant reduction, there should be incidental co-pollutant reductions as GHGs are being reduced [which] should improve the health of local communities.”]; see also Scoping Plan at p. 74 [“Air pollution from tailpipe emissions contributes to respiratory ailments, cardiovascular disease, and early death, with disproportionate impacts on vulnerable populations such as children, the elderly, those with existing health conditions . . . , low income communities, and communities of color.”].)

**III. RESPONDENTS’ EIR VIOLATES CEQA**

As explained above, the EIR’s approach to GHG analysis misrepresents the Cap-and-Trade Program and the Project’s place in that scheme. As a result, the EIR takes an unsupportable approach to evaluating the significance of GHG emissions from the Project. Contrary to CEQA’s focus on information disclosure and local responsibility for mitigation, the EIR ignores the vast majority of the Project’s emissions, and, in a misleading analysis, compares only a small fraction of the Project’s emissions to the applicable significance threshold. This flawed analysis leads the EIR to conclude that the impact from GHG emissions would be mitigated to a less-than-significant level, misleading the public and shirking mitigation responsibilities. Even if the Cap-and-Trade Program directly

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applied to the Project’s emissions (it does not since, as explained above, this Project is not a covered entity under the Program), this method of evaluating a project’s significance *after* taking into account purported “mitigation” or impact-reducing components is not allowed by CEQA. As a result of its flawed analysis, the EIR fails to adopt all feasible mitigation measures and subverts CEQA’s important political function of ensuring informed decision making and informed public participation.

The EIR’s approach to GHG analysis fails on multiple levels. Perhaps most critically, in addition to pointing to “compliance” with a regulation that simply does not cover the Project to excuse mitigation, the EIR focuses on a single significance consideration while ignoring other evidence showing potentially significant impacts. CEQA does not allow clearly significant GHG impacts to be overlooked, even if a lead agency believes those impacts are considered less than significant under one particular metric. (See, e.g., *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 274 [citizens’ personal observations about the significance of noise impacts on their community constituted substantial evidence that the impact may be significant and should be assessed in an EIR, even though the noise levels did not exceed general planning standards]; accord *SANDAG, supra*, 3 Cal.5th at p. 515 [“An adequate description of adverse environmental effects is necessary to inform the critical discussion of mitigation measures and project alternatives at the core of the EIR”].) This failure to address potentially significant impacts not only minimizes the Project’s significant impacts, but also warps the evaluation of whether the Project’s contribution to GHG emissions is a cumulatively considerable impact. (CEQA Guidelines, § 15064.) The cumulative effect of dozens of similar warehouse projects in the Moreno Valley area could—and almost certainly will—be significant.

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**A. The EIR improperly applies CEQA Guidelines Section 15064.4 to determine the significance of the Project's GHG emissions.**

The Resources Agency, the state's expert on CEQA, has rejected the approach of using purported "compliance" with an inapplicable program to mitigate emissions. (Final Statement of Reasons for the CEQA Guidelines Amendments (2018) at p. 27 ["a subdivision project could not demonstrate 'consistency' with [CARB's] Early Action Measures because those measures do not address emissions resulting from a typical housing subdivision"].)

The EIR misapplies CEQA Guidelines section 15064.4, which offers multiple factors a lead agency should consider in assessing the significance of impacts from GHG emissions. That Guideline provides, in pertinent part:

- (b) A lead agency should consider the following factors, *among others*, when assessing the significance of impacts from greenhouse gas emissions on the environment:
  - (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
  - (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
  - (3) 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 greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a *particular project* are still cumulatively considerable notwithstanding compliance with the adopted

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regulations or requirements, an EIR must be prepared for the project.<sup>9</sup>

(CEQA Guidelines, § 15064.4, subd. (b), italics added.)

As reflected in subdivision (b)(3), compliance with “regulations or requirements adopted to implement a statewide, regional, or local plan” can factor into the assessment of GHG significance, but only when *the project complies* with those regulations or requirements. Yet, the EIR relies upon subsection (b)(3) to claim that emissions for which upstream suppliers surrendered allowances need not be analyzed and mitigated under CEQA. This approach excuses all of the Project’s transportation- and electricity-related emissions, thus requiring analysis and mitigation of only a tiny fraction of the Project’s emissions.

<sup>9</sup> The 2018 update to the CEQA Guidelines added the following language:

(b) In determining the significance of a project’s greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project’s emissions to the effects of climate change. The agency’s analysis should consider a timeframe that is appropriate for the project. The agency’s analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes.

(b)(3) . . . In determining the significance of impacts, the lead agency may consider a project’s consistency with the State’s long-term climate goals or strategies, provided that substantial evidence supports the agency’s analysis of how those goals or strategies address the project’s incremental contribution to climate change.

(c) A lead agency may use a model or methodology to estimate greenhouse gas emissions resulting from a project. The lead agency has 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. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use.

Respondents' application of subdivision (b)(3) to this Project is wrong. Because the Project is not a covered entity under the Cap-and-Trade Program, subsection (b)(3) is inapplicable, as the project cannot "comply" with Cap-and-Trade at all. Moreover, as discussed above, such "compliance" would undermine Cap-and-Trade's purposes if adopted as a CEQA approach, not serve the environmental goals both AB 32 and CEQA set out to deliver.

**B. The EIR failed to apply the SCAQMD's GHG emissions threshold to all of the Projects' GHG emissions.**

The EIR takes an impermissible approach of applying the Cap-and-Trade Program to ostensibly reduce the Project's emissions significantly, then comparing only that reduced quantity to the bright-line significance threshold. This approach is not supported in law.<sup>10</sup>

CEQA requires lead agencies to "make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project." (CEQA Guidelines, § 15064.4.) CEQA then provides that the lead agency must consider "whether *the project emissions* exceed a threshold of significance the lead agency determines applies to the project." (*Id.* at subd. (b)(2).) As explained in the EIR, a potentially appropriate

<sup>10</sup> The EIR also attempts to justify excluding "capped emissions" from its significance analysis by referencing two seemingly cherry-picked 2013 mitigated negative declarations from other lead agencies, and one 2014 guidance document from the San Joaquin Valley Air Pollution Control District (SJVAPCD). (EIR 4.7-33.) The EIR does not explain why it chose to follow the methodology allegedly used in two obscure mitigated negative declarations and in a policy document from an air district in a different air basin, rather than following traditional CEQA GHG analysis and mitigation principles. These irrelevant, project-specific documents do not constitute substantial evidence supporting Respondents' argument.

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significance threshold in this case is the South Coast Air Quality Management District's (SCAQMD) SCAQMD's 10,000 metric ton limit.<sup>11</sup> (EIR at p. 4.7-32.)

The problem here is that the EIR does not compare the Project's total GHG emissions against this 10,000 metric ton threshold, and then mitigate those emissions to below that threshold to the extent feasible. Instead, the EIR simply subtracts from the total any GHG emissions it deems to be "capped," and compares only the few "non-capped" emissions to the bright-line threshold. Because the EIR only compares a small fraction of the Project's GHG emissions to the applicable bright-line significance threshold, it only requires relatively minor mitigation measures to reduce the Project's emissions to what the EIR considers "less than significant." (EIR at pp. 1-55-57.)

Respondents' approach improperly applies so-called "mitigation" (the Cap-and-Trade Program) *before* comparing GHG emissions to the significance threshold. By combining impacts and mitigation analyses, it is unclear how the purported mitigation reduces impacts. This approach was rejected in *Lotus v. Dept. of Transportation* (2014) 223 Cal.App.4th 645, where the court stated:

The failure of the EIR to separately identify and analyze the significance of the impacts . . . before proposing mitigation measures is not merely a harmless procedural failing. . . . [T]his shortcutting of CEQA requirements subverts the purposes of CEQA by omitting material necessary to informed decisionmaking and informed public participation. It precludes both identification of potential

<sup>11</sup> It is worth noting that the Scoping Plans are not binding as to any particular CEQA methodology, or as to land use planning generally, and do not require use of any particular significance threshold. They are guidance documents; individual land use authorities can and do depart from particular suggestions in them if they have appropriate reasons to do so. The issue in this case, however, is that the Cap-and-Trade program does *not* provide such an appropriate reason.

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environmental consequences arising from the project and also thoughtful analysis of the sufficiency of measures to mitigate those consequences. The deficiency cannot be considered harmless.

(*Id.* at p. 658.)

Furthermore, if the full scope of the GHG emissions attributable to the Project were compared to the applicable bright line threshold, the emissions, as mitigated, would still be substantially over the threshold—and would therefore require consideration of additional mitigation measures. (See EIR, pp. 4.7-35–36.)

Applying appropriate mitigation measures to reduce the so-called “capped” emissions would not “result in double counting and double mitigating emissions that are already mitigated through cap-and-trade” as Respondents assert. (Combined Respondents’ and Cross-Appellants’ Opening Brief at p. 57.) Gesturing towards Cap-and-Trade regulated entities is not proper mitigation because Cap-and-Trade does not apply to this Project in any way, and the Project itself has ample mitigation opportunities onsite. To mitigate this Project’s GHG emissions, Respondents would have to address emissions from mobile sources, which account for over 70% of the Project’s total emissions (which again are nearly 40 times greater than the significance threshold). (AR002729.) To reduce these emissions, fewer trucks could drive from the Project to the Ports of Long Beach and Los Angeles every day, the Project could be built closer to the ports, the Project could require more zero emission vehicles be used or provide charging equipment or incentives to encourage their use, or any number of other meaningful mitigation measures. But Cap-and-Trade does not require any of this. Such measures are instead included by local governments in local land use projects to ensure approved project impacts fall below significance thresholds. By never counting the “capped” emissions toward the significance threshold, there is *no* counting and *no*

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project-level mitigation of hundreds of thousands of tons of yearly GHG emissions from this Project.

**C. Respondents fail to consider the long-term GHG impacts of the Project.**

The Supreme Court has made clear that an EIR should consider a project’s long-term GHG impacts, and should address whether the project as a whole is in accord with the state’s climate goals. (*Cleveland National Forest Foundation v. San Diego Association of Governments* (2017) 3 Cal.5th 497 (*SANDAG*) at p. 515.)<sup>12</sup> The state’s climate change goals extend beyond 2030. (See, e.g., Executive Order S-03-05 [established a statewide target of reducing GHG emissions to 80 percent below 1990 levels by 2050].) Because the Project is expected to operate for decades into the future, Respondents must account for emissions beyond 2030. But Respondents fail to account for emissions beyond that point—despite the fact that the Project’s full operation will not start until *five years later*, in 2035. (EIR at p. 4.3-61.) Respondents present no substantial evidence that any of the Project’s post-buildout operational emissions are mitigated by the Cap-and-Trade Program. (See, e.g., EIR, pp. 4.7-36-37 [stating, without citation, that “[s]ome of the project’s GHG emissions are subject to the requirements of the AB 32 Cap and Trade Program and will have a GHG allocation based on current GHG emissions levels”].) This is not an adequate CEQA analysis. (See *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 904 [EIR must contain substantial evidence that mitigation measures will reduce associated impacts to less-

<sup>12</sup> The parties in *AIR v. Kern* did not have the opportunity to brief the significance of *SANDAG* because the California Supreme Court filed its opinion in *SANDAG* over a month after the close of briefing in *AIR v. Kern*. It appears to amici that this is the first case at the California Court of Appeal where parties have had the opportunity to address both *SANDAG* and *AIR v. Kern* in their briefs.

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than-significant-levels, such as by requiring compliance with applicable regulatory standards and preparation of site-specific studies], Cal. Code Regs. tit. 14, § 15370, subd. (d) [“mitigation” includes “[r]educing or eliminating the impact over time by preservation and maintenance operations during the life of the action”].)

**D. Reliance on *AIR v. Kern County* is improper.**

Respondents incorrectly claim the Fifth Appellate District’s decision in *Association of Irrigated Residents v. Kern County Bd. of Supervisors* (2017) 17 Cal.App.5th 708 (*AIR*) upheld the use of the same GHG methodology as Respondents attempt to use here. (Combined Respondents’ and Cross-Appellants’ Opening Brief at p. 53.) Respondents’ use of the Cap-and-Trade Program here goes far beyond what was sanctioned in *AIR*. In *AIR*, the project being evaluated under CEQA was a refinery, a covered entity under Cap-and-Trade. The court held a lead agency was authorized “to determine that a project’s greenhouse gas emissions will have a less than significant effect on the environment based on the project’s compliance with the cap-and-trade program.” (*Id.* at p. 718; italics added.) Regardless of whether or not *AIR* was rightly decided, here, the question is much simpler and different from the question before the court in *AIR*. Here, it is undisputed that the Project is not a covered entity required to comply with the Cap-and-Trade Program. (Cal. Code Regs., tit. 17, § 95811.) Accordingly, this Court need only decide if projects that are not covered entities under Cap-and-Trade are nonetheless allowed to use the program to ignore significant GHG emissions they cause. The answer to that question is no.

Respondents argue the distinction between covered and non-covered entities is “a distinction without a difference.” (Combined Respondents’ and Cross-Appellants’ Opening Brief at p. 63.) Respondents are incorrect.

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This distinction is crucial under CEQA and vital to the success of California's ambitious climate policies.

From a CEQA perspective, the distinction is important because CEQA Guidelines section 15064.4, subdivision (b)(3) instructs lead agencies to consider the extent to which a project complies with GHG regulations or requirements. It is thus inappropriate for entities downstream in the chain of commerce from a covered entity to rely upon compliance with the Cap-and-Trade Program as a basis for avoiding analysis of project-related emissions.

From a policy perspective, as described above, the distinction is crucial because projects that are not subject to the Cap-and-Trade Program do not have the same direct incentives to reduce their GHG emissions as covered facilities, and Cap-and-Trade alone is not designed to achieve California's ambitious climate goals. The distinction between covered and not-covered entities is thus crucial to the portfolio of climate change measures the state is relying on to protect our citizens going forward.

**E. Respondents' GHG analysis obfuscates the climate change impacts of this Project, undermining CEQA's public disclosure purpose.**

By failing to comply with CEQA Guidelines Section 15064.4, failing to compare all of the Project's emissions to the GHG emissions threshold, and failing to consider the long-term GHG impacts of the Project, Respondents' analysis undermines the informational purpose of CEQA. The purpose of an EIR "is to inform the public generally of the environmental impact of a proposed project." (Cal. Code Regs. tit. 14, § 15003, subd. (c).)

CEQA prohibits public agencies from approving or carrying out a project that will have significant effects on the environment unless the agency makes "findings" demonstrating either that it made changes to the

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project to avoid or mitigate those significant impacts, or that certain overriding considerations outweigh the impact. (Pub. Resources Code, § 21081.) Without a full and accurate disclosure of the Project's impacts, Respondents erroneously concluded that the GHG impact would be less-than-significant, and thereby avoided making the subsequent findings that would inform the public whether the Project's significant impacts are unavoidable and/or justified. Additionally, Respondents' approach hinders the public's ability to submit informed comments during the EIR's public comment period—aside from addressing the *lack* of analysis—because the public is not provided with, and thus cannot evaluate, complete information or proper CEQA analysis.

**CONCLUSION**

California is striving on all fronts to meet its ambitious, long-term GHG reduction objectives; the health of its citizens and the environment depend on it. But this Court's approval of Respondents' approach to GHG analysis and mitigation would treat the Cap-and-Trade Program as the sole remedy to limit GHG emissions from land-use projects, placing unnecessary strain on Cap-and-Trade's cost-effectiveness and seriously undermining the state's critical climate change efforts. Amici respectfully request this Court reject the trial court's holding and find in favor of Appellants as to GHG analysis.

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LETTER

RESPONSE

Dated: January 10, 2020

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**CERTIFICATE OF COMPLIANCE**

I certify that the attached Brief of Amici Curiae the Attorney General and the California Air Resources Board in Support of Plaintiffs and Respondents Albert Thomas Paulek, *et al.* and Plaintiffs and Appellants Laborers International Union of North America, Local 1184, *et al.* uses a 13 point Times New Roman font and contains 7,647 words.

Dated: January 10, 2020      XAVIER BECERRA  
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**DECLARATION OF ELECTRONIC SERVICE VIA TRUEFILING**

Case Name: **PAULEK, ET AL., V. MORENO VALLEY COMMUNITY SERVICES DISTRICT, ET AL., California Court of Appeal, Fourth Appellate District, (Amicus Brief)**  
No.: **E071184**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General. Correspondence that is submitted electronically is transmitted using the TrueFiling electronic filing system. Participants who are registered with TrueFiling will be served electronically.

On January 10, 2020, I electronically served the attached:

**BRIEF OF AMICI CURIAE THE ATTORNEY GENERAL AND THE CALIFORNIA AIR RESOURCES BOARD IN SUPPORT OF PLAINTIFFS AND RESPONDENTS ALBERT THOMAS PAULEK, ET AL. AND PLAINTIFFS AND APPELLANTS LABORERS INTERNATIONAL UNION OF NORTH AMERICA, LOCAL 1184, ET AL.**

by transmitting a true copy via this Court's TrueFiling system to the parties as follows:

**SEE ATTACHED SERVICE LIST**

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on January 10, 2020, at Sacramento, California.

\_\_\_\_\_  
PAULA CORRAL  
Declarant

\_\_\_\_\_  
/s/ Paula Corral  
Signature

DOC#1184081

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LETTER

RESPONSE

Letter I-33

From: Linda McKinley  
To: Chris Ormsby  
Subject: Voicing my opposition to the proposed general plan  
Date: Monday, May 17, 2021 7:16:02 AM

Warning: External Email – Watch for Email Red Flags!

"I am writing to voice my opposition to the proposed general plan update and draft EIR and ask that this document be entered into the public record (and actually read by staff, planning commission and staff). CEQA identified two alternatives that protect the NE end of Moreno Valley, 6.4 Reduced Growth Alternative and 6.5 Redistributed Growth Alternative which has been identified as 6.6 Environmentally Superior Alternative. Both of these alternatives retain our 2006 general plan land uses in the NE and are the appropriate actions.

The city has repeatedly been unwilling/unable to protect residents from significant negative impacts related to but not limited to noise, truck traffic, pollution, and crime created by unethical and improper rezoning. We can't trust the city to protect the NE area therefore we respectfully request that the CEQA alternatives be adapted. Our health and quality of life need to override developers profit."

Yes, the above is copied and pasted from another's email to you, but I entirely agree with the content.

I want to also personally say that I live in the north east area of Moreno Valley and purposely moved here to live in an area zoned for large animal keeping and the life style that goes along with it! I am against high density housing in this area, and we deserve a place to accommodate this chosen life style. We are already suffering enough with the huge warehouses built south of the 60 freeway and all the truck traffic it entails.

Thank you

Linda McKinley

Resident of NE Moreno Valley since 2000

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- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 2 All comments will be provided to the decision makers for consideration. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 3 Comment noted. While the comment expresses concern about significant negative impacts related to noise truck traffic, pollution, and crime, the comment does not raise a specific issue or concern about the content of the Draft EIR therefore a more detailed response cannot be provided. Refer to the following Draft EIR Sections for discussion of impacts related to noise (4.13), air quality (4.3), and transportation (4.16).
- 4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 5 Comment noted.
- 6 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 7 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

Letter I-34

From: Lorena  
To: Chris Ormsby  
Subject: Moreno beach, ironwood land changes  
Date: Tuesday, May 4, 2021 8:18:20 PM

Warning: External Email – Watch for Email Red Flags!

Hello Mr. Ormsby,

I'm the owner of the property on Pettit right across the street of the vacant lot. I bought this property because we were looking for a house with a bigger lot and less people around. It was very hard to find properties like ours around Moreno Valley since everything is so condensed. I have been a resident of Moreno Valley for over 15 yrs and this is my third property in the city. I decided not to move to riverside because of the property that I was able to find here. Now, the city is planning to ruined the type of property creating houses with small backyards. I see you guys are already doing that in the south side of Moreno Valley, why to destroy the only nice area of Moreno Valley with more population. At least if you want to develop that area do it with the same ratio as right now and don't destroy the value of our homes. Also, where does the wild animals going to go? Now that you keep developing the city. We have enough Warehouses and traffic in this city and it's other areas that are not taking care of that office spaces can be redone and make them better like in sunny mead bld. Please receive this email as a complaint for the plans on this area.

Thank you,

Lorena Moya  
12038 Pettit St,  
Moreno Valley 92555

Sent from my iPhone

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City's RHNA allocation in accordance with State Housing laws.

LETTER

RESPONSE

Letter I-35

From: Marcia Narog  
To: Chris Ormsby  
Subject: Moreno Valley General Plan  
Date: Friday, May 14, 2021 9:18:10 PM

Warning: External Email – Watch for Email Red Flags!

To all that it may concern:

I am opposed to any changes to the 2006 NE end general plan. The model we developed through many community meetings still holds for the intended use desired by the residents. We want to maintain a low density, rural community. This is the last part of the city that has the opportunity to offer this rural community choice with larger than postage stamp lots. If diversity is important then what the 2021 changes will do is destroy any opportunity for Moreno Valley residents to have a choice to live in a lower density community that allows large animal keeping lifestyle.

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Not allowing input by citizens in this review process is wrong. There is no reason these decisions have to be made without citizen input. Many things have been delayed due to the pandemic. This is an important city mandate that should be allowed to be handled in person. Let's start this process over again and do it legally and correctly. Since the quarantine restrictions are being lifted the process should be delayed so that the select biased few that came up with the new General Plan will not be allowed to railroad the rest of us into their poor life quality design. For example...there should be no warehouses north of the freeway int the NE sector, so there is no need for truck routes on Redlands and Theodore Blvds north of Hwy 60. There will also be conflicts between rural lifestyle uses and high density housing that can not be mitigated in any way. Semi-trucks do not belong on steep curving roads like Redlands Blvd. And horses and semi-trucks are not a compatible mix at the Equestrian Center.

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I can not believe that people who designed the changes for the General Plan were residents of this area or even had the best interests of the residents in their hearts and minds.

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Please STOP destroying the last precious vestiges of our city and STOP flushing our vision of quality of life. Delay the process and get it done RIGHT!

Sincerely,

Marcia Narog

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 2 As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initial outreach included stakeholder interviews, six 'pop-up' outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members (Draft EIR page 2-9). The City formed the General Plan Advisory Committee (GPAC), as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU. Additional community-wide surveys and multiple public meetings were held between December 2019 and May 2020, with close to 1,000 community members participating in the 2021 GPU process. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 3 This comment does not suggest an inadequacy in the analysis of the Draft EIR. Truck traffic on City streets is restricted to specific routes that are designated for thru traffic of trucks over three tons; the truck network system is identified in the City's Municipal Code.
- 4 This comment does not suggest an inadequacy in the analysis of the Draft EIR. All comments will be provided to decision makers for consideration.

LETTER

RESPONSE

Letter I-36

From: lia.rhames
To: Chris Ormsby
Subject: Comments regarding the 2021 General Plan, Draft EIR, and Climate Action Plan
Date: Monday, May 17, 2021 3:54:14 PM

Warning: External Email - Watch for Email Red Flags!

I Lia Rhames am a resident of Moreno valley in the Northeast Sterling Ranch homes of Deep Valley Trail/ Cloverdale Moreno Valley, CA.

I would like to make known mu official objection statement to the 2021 General Plan, Draft EIR, and Climate Action Plan. These proposed new general plan land use changes I fully oppose and demand that the zoning changes proposed be rejected totally from this or any other non-citizen generated changes in this quadrant of the city I am a resident of and that I would like the current 2006 General Land Use Map to be retained/ kept for this area.

For loss or diminish of property value there also are some legal theories that can be asserted like spot zoning. Illegal spot zoning typically applies when land use zoning is applied only to a specific parcel and not a general geographic area that can be a stance to sustain a civil lawsuit against the city.

I would like my questions to be addressed by all appropriate parties as they are followed in this email:

How will Sterling Ranch Residents be protected from light, noise, and air pollution as well as litter and increased crime that does not currently exist in our neighborhoods from the proposed land uses ?

Since under California State Law it prohibits any developers or parties from building or developing on a fault zone/ earthquake fault zones without a professional and accredited state approved geologist to investigate and map faults to set safety zones of 500 feet on either side of any development how is the city officials attempting to implement a NE General Plan for Moreno valley plan which zones for large commercial plots on the most active fault in Southern California the San Jacinto Fault: zone apart of the San Andreas Fault system ?

How are the city of Moreno Valley officials providing a NE general 2021 plan that is illegal plot zoning which eliminates prominent categories of residential housing and in legal theory causes loss and or diminish of property homes that can be asserted and stance to sustain a civil lawsuit by residents against the city and environmental organizations or federal wildlife protection agencies ?

Our areas earmarked for executive housing and animal keeping (large lots) in 2006, the current

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- 1 Introductory comment. See responses to specific comments below.
2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City's RHNA allocation in accordance with State Housing laws.
3 See responses to specific comments below.
4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with light and glare are presented in Section 4.1 Aesthetics of the Draft EIR. Impacts associated with noise are presented in Section 4.13 Noise of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Impacts associated with police protection are presented in Section 4.15 Public Services and Recreation.
5 Section 4.7.5.1.a of the Draft EIR states the following:
Title 8, Chapter 8.21 Grading Regulations of the Municipal Code specifies that a geotechnical report is required for all grading projects, and a preliminary soil report, preliminary engineering geology report, and/or seismicity report may be required depending on site specific conditions.
Additionally, 2021 GPU Safety Element includes the following policy that was presented in Section 4.7.5.1.a of the Draft EIR:
S.1-1 Continue to restrict the development of habitable structures within Alquist-Priolo Earthquake Fault Zones consistent with state law.
Therefore, future projects proposed within the San Jacinto Fault Zone would require geotechnical investigations to determine the seismic site characteristics and appropriate safety measures, and habitable structures would be restricted within Alquist-Priolo Earthquake Fault Zones consistent with state law.
6 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
7 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

proposal for 2021 does not mention either. What happened to those designations as both are critically important for diversity of housing ?

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Cont.

Why has the city officials refused to and not hosted a meeting open to the public to establish the city's goals and objectives for future group and implemented or encouraged all public comments and perspective input in changes that directly impact quality of life of residents of Moreno Valley ?

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In the 2021 General plan have you addressed the severe quality of help effects and impact and environmental impact on wildlife in a crime free area of the city in comparison to other sections?

9

Why does the Mayor of Moreno Valley refuse to appoint NE residents of the city in the update committee for this critically impactful proposed plan while appointing his donors, supporters, and developers which is a conflict of interest in legal terms ?

10

The politicians and city officials that stand for Moreno Valley I have never seen promote anything for the greater of the community and only for self-gain. Why not instead host holiday or fall festivals, city country clubs for resident uses, equestrian centers to volunteer or interact with wildlife, sports parks, walking trails and routes, community parks or gardens, or other events in our city area of Moreno Valley, as well as protection for the beautiful wildlife (Donkeys which is something you shouldn't take for granted because it ceases to exist in most cities).

11

Why not make this city somewhere where people would enjoy the journey of witnessing do you only see the future of it as industrialized without hearing residents thoughts and considerations or perspectives. There is not a decrease in employment rates. You are supposed to look into the best interests of your constituents. There is value in the quality of life for people who live amongst you in this city.

There is value in the quality of life for people who like amongst you. I was fascinated when I first arrive to this city to see the beautiful wildlife that is something you shouldn't take for granted because it ceases to exist in most cities. These changes would effect all parts of the community who have health issues and our families ?

12

Lia Rhames  
Phone: (909) 566-9278  
Email: puppies2323@icloud.com

8 As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initial outreach included stakeholder interviews, six 'pop-up' outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members (Draft EIR page 2-9). The City formed the General Plan Advisory Committee (GPAC), as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU. Additional community-wide surveys and multiple public meetings were held between December 2019 and May 2020, with close to 1,000 community members participating in the 2021 GPU process. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

9 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Impacts associated with biological resources are presented in Section 4.4 Biological Resources of the Draft EIR. Impacts associated with police protection are presented in Section 4.15 Public Services and Recreation.

10 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

11 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

12 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Impacts associated with biological resources are presented in Section 4.4 Biological Resources of the Draft EIR.

LETTER

RESPONSE

Letter I-37

From: [Shade Rhames](#)  
To: [Chris Ormsby](#)  
Subject: Comments on the 2021 General Plan, Draft EIR, and Climate Action Plan  
Date: Monday, May 17, 2021 4:51:17 PM

**Warning: External Email – Watch for Email Red Flags!**

I Shade Rhames am a resident of Moreno Valley, CA in the Northeast Sterling Ranch homes of Deep Valley Trail/ Cloverdale. I would like to make known my official objection statement to the 2021 General Plan, Draft EIR, and Climate Action Plan. These proposed new general plan land use changes I fully oppose and demand that the zoning changes proposed be rejected totally from this or any other non-citizen generated changes in this quadrant of the city I am a resident of and that I would like the current 2006 General Land Use Map to be retained/ kept for this area. The current draft of the General Land Use Map of 2021 will have a severely negative impact on our neighborhood, our quality of life, and the safety of our families where no crime is present. This is not acceptable, and we are planning to continue and act to express our objections and opinions to all. I have been in consultation with property and real-estate lawyers as well as Riverside Courts and Civil lawyer representatives from law firms which express residents' applicable stance to sustain multiple lawsuits against the city.

I would like my questions to be addressed by all appropriate parties as they are followed in this email:

Will Sterling Ranch homes and surrounding residents be protected from any traffic from the proposed land used under the GPU ? If so then how will we be provided written protection in word from city officials ?

Will Sterling Ranch Homes, Wildlife, and surrounding residents be protected under California law from enduring a disproportionate share of environmental pollution and public health hazard that these General plans changes will impose upon citizens ?

Why is the city of Moreno Valley official not following in accordance with the law it's duties to citizens of the Moreno Valley city and why have they not hosted meeting for residents inputs that directly impact our city and wildlife that is protected under law ?

How will Sterling ranch residents and surrounding areas be impacted by users of the mixed use/ commercial areas? And how will us residents of Moren valley be protected from these such intrusions on quality of life ?

Since under California State Law it prohibits any developers or parties from building or developing on a fault zone/ earthquake fault zones without a professional and accredited state approved geologist to investigate and map faults to set safety zones of 500 feet on either side of any development how is the city officials attempting to implement a NE General Plan for Moreno valley plan which zones for large commercial plots on the most active fault in Southern California the San Jacinto Fault zone apart of the San Andreas Fault system ?

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- 1 Introductory comment. See responses to specific comments below.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City's RHNA allocation in accordance with State Housing laws.
- 3 See responses to specific comments below.
- 4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with transportation are presented in Section 4.16 Transportation of the Draft EIR.
- 5 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Impacts associated with biological resources are presented in Section 4.4 Biological Resources of the Draft EIR. Impacts associated with hazards are presented in Section 4.9 Hazards and Hazardous Materials.
- 6 As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initial outreach included stakeholder interviews, six 'pop-up' outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members (Draft EIR page 2-9). The City formed the General Plan Advisory Committee (GPAC), as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU. Additional community-wide surveys and multiple public meetings were held between December 2019 and May 2020, with close to 1,000 community members participating in the 2021 GPU process. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 7 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

	<p>8 Section 4.7.5.1.a of the Draft EIR states the following:</p> <p><i>Title 8, Chapter 8.21 Grading Regulations of the Municipal Code specifies that a geotechnical report is required for all grading projects, and a preliminary soil report, preliminary engineering geology report, and/or seismicity report may be required depending on site specific conditions.</i></p> <p>Additionally, 2021 GPU Safety Element includes the following policy that was presented in Section 4.7.5.1.a of the Draft EIR:</p> <p><i>S.1-1 Continue to restrict the development of habitable structures within Alquist-Priolo Earthquake Fault Zones consistent with state law.</i></p> <p>Therefore, future projects proposed within the San Jacinto Fault Zone would require geotechnical investigations to determine the seismic site characteristics and appropriate safety measures, and habitable structures would be restricted within Alquist-Priolo Earthquake Fault Zones consistent with state law.</p>
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LETTER

RESPONSE

<p>How are the city of Moreno Valley officials providing a NE general 2021 plan that is illegal plot zoning which eliminates prominent categories of residential housing and in legal theory causes loss and or diminish of property homes that can be asserted and stance to sustain a civil lawsuit by residents against the city and environmental organizations or federal wildlife protection agencies ?</p>	9	<p>9 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.</p>
<p>Our areas are earmarked for executive housing and animal keeping (large lots) in 2006 general plan proposal, the current proposal for 2021 does not mention either. What happened to those designations as both are critically important for diversity of housing ?</p>	10	<p>10 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.</p>
<p>If the city does not have an employment crisis or housing crisis why are they trying to make these changes that are detrimental to the health of citizens instead of advocating for what citizens want an their wellbeing to ensure mass pollution, traffic, and crime does not increase in our city from these changes ?</p>	11	<p>11 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.</p>
<p>What is the data and statistics surrounding these proposed changes and will you submit this to allow public view, input, and discussion?</p>		<p>12 All comments submitted on the Draft EIR have been responded to and are presented in the Final EIR. The City will hold a Planning Commission hearing and City Council hearing that will allow time for the public to make comments.</p>
<p>What platform or appropriate parties will address resident and citizen questions in regard to our delivered Comments on the 2021 General Plan, Draft EIR, and Climate Action Plan ?</p>	12	<p>13 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR.</p>
<p>If citizens are protected under law and have rights to health impacts from your proposed 2021 general plan to implement large parcels of land in a focused area directly near citizens that produce lethal smog emissions from buildings and big diesels which also damage the city how will you address these concerns and how taxpayer money is being used incorrectly for the betterment of the city my officials ?</p>	13	<p>14 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with views are presented in Section 4.1 Aesthetics of the Draft EIR. Impacts associated with biological resources are presented in Section 4.4 Biological Resources of the Draft EIR. Impacts associated with police protection are presented in Section 4.15 Public Services and Recreation.</p>
<p>Why are you making these changes that directly decrease residents property value that we made investment in large ranch homes on the outskirts of town that officials have promised in written word to also not impact our skyline view and wildlife, and public safety which is a requirement of law ?</p>	14	<p>15 See response to comment 6 of this letter above.</p>
<p>Why has the city officials refused to and not hosted a meeting open to the public to establish the city's goals and objectives for future group and implemented or encouraged all public comments and perspective input in changes that directly impact quality of life of residents of Moreno Valley ?</p>	15	<p>16 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Impacts associated with biological resources are presented in Section 4.4 Biological Resources of the Draft EIR. Impacts associated with police protection are presented in Section 4.15 Public Services and Recreation.</p>
<p>In the 2021 General plan have you addressed the severe quality of help effects and impact and environmental impact on wildlife in a crime free area of the city in comparison to other sections?</p>	16	<p>17 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.</p>
<p>Why does the Mayor of Moreno Valley refuse to appoint NE residents of the city in the update committee for this critically impactful proposed plan while appointing his donors, supporters, and developers which is a conflict of interest in legal terms ?</p>	17	
<p>The politicians and city officials that stand for Moreno Valley I have never seen promote anything for the greater of the community and only for self-gain. Why not instead host holiday or fall festivals,</p>		



LETTER

RESPONSE

city country clubs for resident uses, equestrian centers to volunteer or interact with wildlife, sports parks, walking trails and routes, community parks or gardens, or other events in our city area of Moreno Valley, as well as protection for the beautiful wildlife (Donkeys which is something you shouldn't take for granted because it ceases to exist in most cities).

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Cont.

Why not make this city somewhere where people would enjoy the journey of witnessing do you only see the future of it as industrialized without hearing residents thoughts and considerations or perspectives. There is not a decrease in employment rates. You are supposed to look into the best interests of your constituents. There is value in the quality of life for people who live amongst you in this city.

There is value in the quality of life for people who like amongst you. I was fascinated when I first arrive to this city to see the beautiful wildlife that is something you shouldn't take for granted because it ceases to exist in most cities. These changes would effect all parts of the community who have health issues and our families ?

18

Why have there not been effective open discussions and meetings held for residents to have input and comment on these proposed direct changes and plans to our city ?

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Shade Rhames

18 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Impacts associated with biological resources are presented in Section 4.4 Biological Resources of the Draft EIR.

19 See response to comment 6 of this letter above.

LETTER

RESPONSE

Letter I-38

From: Shyann Rhames
To: Chris Ormsby
Subject: Comments regarding the 2021/ 2040 General Plan, Draft EIR, and Climate Action Plan
Date: Monday, May 17, 2021 3:43:59 PM

Warning: External Email - Watch for Email Red Flags!

I Shyann Rhames am a resident of Moreno valley in the Northeast Sterling Ranch homes of Deep Valley Trail/ Cloverdale Moreno Valley, CA.

I would like to make known mu official objection statement to the 2021 General Plan, Draft EIR, and Climate Action Plan. These proposed new general plan land use changes I fully oppose and demand that the zoning changes proposed be rejected totally from this or any other non-citizen generated changes in this quadrant of the city I am a resident of and that I would like the current 2006 General Land Use Map to be retained/ kept for this area.

For loss or diminish of property value there also are some legal theories that can be asserted like spot zoning. Illegal spot zoning typically applies when land use zoning is applied only to a specific parcel and not a general geographic area that can be a stance to sustain a civil lawsuit against the city.

I would like my questions to be addressed by all appropriate parties as they are followed in this email:

Since under California State Law it prohibits any developers or parties from building or developing on a fault zone/ earthquake fault zones without a professional and accredited state approved geologist to investigate and map faults to set safety zones of 500 feet on either side of any development how is the city officials attempting to implement a NE General Plan for Moreno valley plan which zones for large commercial plots on the most active fault in Southern California the San Jacinto Fault zone apart of the San Andreas Fault system ?

How are the city of Moreno Valley officials providing a NE general 2021 plan that is illegal plot zoning which eliminates prominent categories of residential housing and in legal theory causes loss and or diminish of property homes that can be asserted and stance to sustain a civil lawsuit by residents against the city and environmental organizations or federal wildlife protection agencies ?

Our areas earmarked for executive housing and animal keeping (large lots) in 2006, the current proposal for 2021 does not mention either. What happened to those designations as both are critically important for diversity of housing ?

- 1 Introductory comment. See responses to specific comments below.
2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City's RHNA allocation in accordance with State Housing laws.
3 See responses to specific comments below.
4 Section 4.7.5.1.a of the Draft EIR states the following:
Title 8, Chapter 8.21 Grading Regulations of the Municipal Code specifies that a geotechnical report is required for all grading projects, and a preliminary soil report, preliminary engineering geology report, and/or seismicity report may be required depending on site specific conditions.
Additionally, 2021 GPU Safety Element includes the following policy that was presented in Section 4.7.5.1.a of the Draft EIR:
S.1-1 Continue to restrict the development of habitable structures within Alquist-Priolo Earthquake Fault Zones consistent with state law.
Therefore, future projects proposed within the San Jacinto Fault Zone would require geotechnical investigations to determine the seismic site characteristics and appropriate safety measures, and habitable structures would be restricted within Alquist-Priolo Earthquake Fault Zones consistent with state law.
5 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
6 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

<p>Why has the city officials refused to and not hosted a meeting open to the public to establish the city's goals and objectives for future group and implemented or encouraged all public comments and perspective input in changes that directly impact quality of life of residents of Moreno Valley ?</p> <p>In the 2021 General plan have you addressed the severe quality of help effects and impact and environmental impact on wildlife in a crime free area of the city in comparison to other sections?</p> <p>Why does the Mayor of Moreno Valley refuse to appoint NE residents of the city in the update committee for this critically impactful proposed plan while appointing his donors, supporters, and developers which is a conflict of interest in legal terms ?</p> <p>Will there be HOA or a gated community option that would institute a community of private roads and not public which cause crime increase and increased traffic ? Will there be truck enforcement and limit of building in accordance with the law to protect community health and safety ?</p> <p>The politicians and city officials that stand for Moreno Valley I have never seen promote anything for the greater of the community and only for self-gain. Why not instead host holiday or fall festivals, city country clubs for resident uses, equestrian centers to volunteer or interact with wildlife, sports parks, walking trails and routes, community parks or gardens, or other events in our city area of Moreno Valley, as well as protection for the beautiful wildlife (Donkeys which is something you shouldn't take for granted because it ceases to exist in most cities).</p> <p>Why not make this city somewhere where people would enjoy the journey of witnessing do you only see the future of it as industrialized without hearing residents thoughts and considerations or perspectives. There is not a decrease in employment rates. You are supposed to look into the best interests of your constituents. There is value in the quality of life for people who live amongst you in this city.</p> <p>There is value in the quality of life for people who like amongst you. I was fascinated when I first arrive to this city to see the beautiful wildlife that is something you shouldn't take for granted because it ceases to exist in most cities. These changes would effect all parts of the community who have health issues and our families ?</p>	<p>7 As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initial outreach included stakeholder interviews, six 'pop-up' outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members (Draft EIR page 2-9). The City formed the General Plan Advisory Committee (GPAC), as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU. Additional community-wide surveys and multiple public meetings were held between December 2019 and May 2020, with close to 1,000 community members participating in the 2021 GPU process. This comment does not suggest an inadequacy in the analysis of the Draft EIR.</p> <p>8 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Impacts associated with biological resources are presented in Section 4.4 Biological Resources of the Draft EIR. Impacts associated with police protection are presented in Section 4.15 Public Services and Recreation.</p> <p>9 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.</p> <p>10 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.</p> <p>11 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.</p> <p>12 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Impacts associated with air quality are presented in Section 4.3 Air Quality of the Draft EIR. Impacts associated with biological resources are presented in Section 4.4 Biological Resources of the Draft EIR.</p>
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LETTER

RESPONSE

Letter I-39

From: [Lindsay Robinson](#)  
To: [Chris Ormsby](#)  
Subject: clarifications please  
Date: Monday, April 5, 2021 6:06:45 AM

**Warning: External Email - Watch for Email Red Flags!**

Hi Chris,

I would like some clarifications on several items in the proposed new general plan that I hope you will answer as the staff person in charge. I have a small screen which makes it difficult to read all these documents.

1) I did not see a Principal Animal Keeping Overlay map in the land use portion. Would you please tell me which page it is on if it is included? If not included in this general plan, does the current PAKO remain in place.

2) There was discussion about making Hemlock a through street from Moreno Beach to Theodore. Is that the final plan? Again it's not clear on the map.

3) The homes on Redlands between the 60 fwy and Hemlock now appear on the map to be commercial. How does that affect those homeowners? I asked that question before and it was ignored by the Benzeevi general plan update committee.

4) Rezoning the area along Moreno Beach below Ironwood from R2 to R10 was NEVER brought up in the public meetings nor even alluded to. Please send me all correspondence and meeting minutes/video related to that change.

5) Please send a pdf of the proposed land use map 2021 so that we may make clear posters.

In closing, 45 days is not enough time for residents to be able to read/study/obtain needed information on all 3 documents at the same time. Each document should have it's own time period to be fair to the residents especially as the biased committee has no representative resident from the NE portion of the city whose community character they are trying to destroy.

Your responses are needed quickly as we don't have much time to respond to the general plan update.

Thank you,  
Lindsay Robinson  
[LR92555@gmail.com](mailto:LR92555@gmail.com)

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1 This comment does not suggest an inadequacy in the analysis of the Draft EIR. Staff provided responses directly to the commenter and additional responses are provided below.

2 If the proposed General Plan is adopted, changes to the PAKO zoning overlay would occur in three locations consistent with the proposed General Plan designations. This comment does not raise an issue regarding adequacy of the EIR.

3 The need for connectivity from Moreno Beach to Theodore/World Logistics Center Parkway will be driven by traffic studies and adjacent land uses as development occurs in the area. This comment does not raise an issue regarding adequacy of the EIR.

4 A commercial designation on property with existing residences does not affect the ability of homeowners to continue to maintain and use their property as residential. Any commercial development would need to be initiated by the landowner. This comment does not raise an issue regarding adequacy of the EIR.

5 The area referenced by the commenter was included as part of the City Council report dated December 15, 2021 on the review of the Draft Housing Element and Sites Inventory Overview. (<https://morenovalleyca.iqm2.com>). The City's website (MV CDD: 2040 General Plan Update [[www.moval.org/2040](http://www.moval.org/2040)]) includes a link to project documents and resources, details about meetings and participation opportunities, and provides links to the video and materials from public workshops for those who were not able to attend. This comment does not raise an issue regarding the adequacy of the EIR.

6 The City provided the requested map directly to the commenter.

7 The Draft EIR was circulated for a 45-day public review period consistent with the requirements of CEQA Guidelines section §21091 (a). The 45-day public review period began April 2, 2021 and ended May 17, 2021. An extension of the CEQA review period is not warranted; however, the City notes that comments on the plan may be provided at any time including at the public hearings for the project.

8 Concluding comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

Letter I-40

From: Lindsay Robinson  
To: Chris Ormsby; David Marquez; Ulises Cabrera; Dr. Yestian A. Gutierrez; Victoria Baca  
Subject: request for 30 day extension to comment on general plan update  
Date: Monday, April 19, 2021 3:55:03 PM

**Warning: External Email – Watch for Email Red Flags!**

Dear Council members and Mr. Ormsby,

I am writing to formally request that you allow a 30 day extension to the comment period deadline regarding the general plan update, draft EIR, and draft climate action plan as there is an extraordinary amount of material for the residents to study, research, compare to the 2006 plan, negative impacts to the NE area to mitigate and receive answers to questions (especially missing information in the document) .

We previously asked that the general plan update be postponed until all residents could participate fully and this was denied therefore an extension to comment should be allowed especially as many of the affected residents have not received any communication from the city.

Thank you for your consideration and response,  
Lindsay Robinson

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1 The Draft EIR was circulated for a 45-day public review period consistent with the requirements of CEQA Guidelines section §21091 (a). The 45-day public review period began April 2, 2021 and ended May 17, 2021. An extension of the review period is not warranted.

Letter I-41

From: [Lindsay Robinson](#)  
To: [Chris Ormsby](#)  
Subject: Re: Public Hearing - MoVal 2040 (General Plan Update, Climate Action Plan, and Environmental Impact Report)  
Date: Saturday, May 15, 2021 5:14:38 AM  
Attachments: [imagecfrc97.PNG](#)

**Warning: External Email – Watch for Email Red Flags!**

Thank you.  
How do you know that the revised EIR will be ready by that date when you've not received the comments nor objections to the plan and EIR as presented? It is seriously flawed with regards to the NE end and all the "no significant impact" designations.  
Will the planning commissioners actually read the comments and revised EIR this time or completely ignore their oaths of office/ethical duties and just vote yes?  
Will the 3 planning commissioners who were handpicked by the mayor to do his and iddo's bidding and non-representative of the residents recuse themselves?  
Please respond with answers.  
Thank you.  
Lindsay Robinson

On Sat, May 15, 2021 at 5:00 AM Chris Ormsby <[chriso@moval.org](mailto:chriso@moval.org)> wrote:

**Public Hearing - MoVal 2040 (General Plan Update, Climate Action Plan, and Environmental Impact Report)**

A Planning Commission public hearing will be held on Thursday, May 27<sup>th</sup> to review and consider MoVal 2040. The meeting begins at 7:00 p.m., and will be conducted on the Zoom platform. Please see the attached public hearing notice for additional details.

The MoVal 2040 documents are available for review on the City's website at <http://www.moval.org/cdd/documents/general-plan-documents.html>, or from a link at [www.moval.org/2040](http://www.moval.org/2040).

Thanks for your interest in the City's General Plan Update.

1 This comment does not suggest an inadequacy in the analysis of the Draft EIR. All comments will be provided to decision makers for consideration.

LETTER

RESPONSE

**Chris Ormsby**  
**Senior Planner**  
**Community Development**  
**City of Moreno Valley**

p: 951.413.3229 | e: [chriso@mvocal.org](mailto:chriso@mvocal.org) | w: [www.mvocal.org](http://www.mvocal.org)  
14177 Frederick St., Moreno Valley, CA 92553



Letter I-42

Robinson GPU Opposition

Dear council, staff, planning commission and residents,

I am writing to voice my opposition to the proposed general plan update and draft EIR and ask that this document be entered into the public record. CEQA identified two alternatives that protect the NE end of Moreno Valley, 6.4 Reduced Growth Alternative and 6.5 Redistributed Growth Alternative which has been identified as 6.6 Environmentally Superior Alternative. Both of these alternatives retain our 2006 general plan land uses in the NE and are the appropriate actions.

When the pandemic hit, many residents requested that the general plan update be postponed until the public could fully participate at ALL committee meetings in an open atmosphere. We were denied.

Committee meeting minutes should be public record yet there aren't any available. Clearly the committee was meeting as the final proposal suddenly has R10 housing in the NE area. The consultant was also editing/censoring our comments during the process which appears to violate the public participation aspect - they handpicked comments that agreed with what they wanted. Additionally questions were NOT answered.

Mayor Gutierrez created a handpicked, biased general plan update committee consisting of his two largest donors, Iddo Benzeevi (warehouses) and Nelson Chung (Pacific Communities- giant homes/small lots no large lots), three planning commissioners (Joann Stephens, Alvin DeJohnette, Ray Baker) and an MVC representative (Carlos Lopez) who are all loyal supporters/friends of Mr. Gutierrez and Mr. Benzeevi. Residents of the NE area requested that Mr. Gutierrez also appoint a representative resident of the NE to protect our interests. Our request was denied.

Our council person was holding meetings for different areas of our district, but the pandemic hit before our area had an informational meeting. Our council person passed away unexpectedly so we have no council representative on this very important process.

Residents requested that we be given a 30 day extension for commenting in order to fully read/study/research the documents. This is a common request that is usually granted according to attorneys. The general plan is roughly 188 pages with an additional summary document, the CAP is 72 pages with another 30 page appendix, and the draft EIR is 541 complicated pages with an appendix. As residents have very full lives and extension was justified so that they could comment on the entire process. Our request was denied.

The city has failed miserably in making sure the public are well informed throughout this process. At this juncture it is clear the city doesn't want full public participation. For the Beautify Moval event the city flooded FB with multiple posts per day, but not for something as important as the general plan update. NE residents in some of the most negatively impacted areas have received no notification from the city. The city picks and chooses what to publicize which severely limits participation.

I will address different areas of the proposed plan and EIR as presented in your documents. There are questions throughout this document so please answer them all clearly and completely.

GP page 14 there is a map showing the city boundaries. This map shows that some county land is now included within the city boundaries rather than sphere of influence. Has the city annexed the county land in the area of Walther/Sean Ct./Harry Keith? If so, when did this occur? City staff still refuse to help the residents in that area as they say it is county. Please provide answers to these questions and if the map is flawed it brings into question the entire document.

GP 17: In addition, a General Plan Advisory Committee (GPAC) was formed to serve in an advisory role—advising and informing City staff, consultants, Planning Commission, and City Council—and met regularly throughout the course of the project to help define community input into a shared vision, brainstorm issues and ideas, and review the policy content of the General Plan to ensure that it met the needs and desires of the community.

2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. Extensive opportunities for public participation have been provided throughout the GPU process.

3 The map referenced by the commenter appears to be map 1-2 Planning Area Boundaries of the GPU. The map shows current City boundaries which excludes the area mentioned by the commenter. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

4 All GPAP meeting materials and video transcripts of the meetings are available for download at [MV CDD: Participate in the 2040 General Plan Update \(moval.org\)](http://MV CDD: Participate in the 2040 General Plan Update (moval.org)).



LETTER

RESPONSE

Robinson GPU Opposition

This states that the GPAC met regularly so why are there no meeting minutes available to the public? Committee meetings of this importance with highly biased members need to be transparent. Again the committee did not represent the residents in the NE area which allowed GPAC to start the process of destroying our community character. Why were they allowed to censor comments that didn't fit their personal agenda?

GP 18 describes livable neighborhoods- The proposed changes to our area clearly violate this "vision" Our 2006 general plan protected our area and needs to be retained.

- 1) Our area of large lots/nice homes/animal keeping meets many of these goals- we have a large population of seniors/retired residents as well as families. We have grown older here. This area is much desired as step up homes. The pandemic has shown that we need the large lots for social distancing/safe outdoor activities etc. in a relatively crime free area. Where have the majority of shootings been occurring? Not in the NE area!
- 2) How can you predict the future needs and lifestyles? This plan has eliminated the executive housing and animal keeping housing that are also important future needs. Why were those eliminated from the plan?
- 3) Our neighborhoods are already interactive – just not in the way this plan seems to think we should. Why are you eliminating an entire area of lifestyles/interactions?
- 4) Prioritizing safety on roads? We already have a difficult time getting any assistance from city staff even when we offer suggestions and offer to pay for safety measures. We are a unique area that doesn't conform thus we get no assistance from the city that other areas receive (most notably special favors for council members). This plan increases road danger throughout the NE. You're adding commercial to an area where the roads are not truck routes. Are you planning to change our roads to truck routes? Why weren't truck routes added to the general plan and all their added noise, pollution, road destruction, and traffic? The city is unable to enforce the existing truck routes as it is, how will you enforce our area roads in the future? Widening Moreno Beach will just increase the already too excessive speeds on our roads. We don't have enough traffic officers to assist us now, how will you assist us in the future? The excessive traffic this proposal will bring will pose excessive danger on our roads to those of us who ride bikes, walk, jog, horseback ride and you will not mitigate these extra dangers.
- 5) Our residents have very active lifestyles already as noted above. The city has failed our area in not completing our master planned trail system as is seen in other areas of the city. If this is a city priority, when will you complete our trails in this area? The NE is woefully underserved with city parks/open space. Residents have requested that the city purchase the land at Ironwood/Nason for an open space nature park as it is part of the master planned trail system, has an abundance of wildlife and trails and a natural spring. As always the city ignores our requests and adds more parks south of the freeway.
- 6) The addition of the warehouses south of the freeway contradict your claim of prioritizing community health/clean air and adding commercial north of the freeway will compound the problem. Quality of life is an important part of community health and commercialization of our area is inappropriate. How will you limit the noise/traffic/pollution/trash/crime associated with commercial areas? The city has been unable/unwilling to mitigate the incessant and excessive noise from the paper company that has disrupted sleep in our established neighborhoods. Our 2006 plan specifically prohibited encroaching into residential neighborhoods with warehouses. Why have our staff and officials violated this over and over? Will you amend our noise ordinance to include warehouses so that they can't operate 24/7 in our neighborhood? Will you protect us by requiring all commercial activity north of the freeway to shut down from 10 pm to 7 am to protect our community health? A necessary solution due to poor planning is to amend the city noise ordinance to include warehouses and commercial buildings that have encroached into residential areas. If you're not willing to limit their noise and hours of operation, this proposal is inappropriate and our 2006 plan needs to be retained.
- 7) Maintain roads? How do you propose to do that when adding so many additional cars/trucks to this area? Our roads are crumbling and the city is unable to maintain them currently.
- 8) Ensure livability- this proposal ruins the livability of our neighborhood. We are the last remaining area of large lots suitable for people of all ages. We have seniors, veterans, families, executives, and animal keepers

- 5 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 6 The comment raises concerns about the plan creating excessive traffic and danger on roadways, but does not raise a specific concern regarding adequacy of the EIR. The City does not agree that additional development and traffic will necessarily bring danger to roadways. As development occurs, site specific analysis will occur to ensure appropriate roadway improvements and pedestrian/bicycle facilities are installed to ensure safety of all residents. The General Plan includes policy EJ.1-9, to “Designate truck routes that avoid sensitive land uses, where feasible.” Truck traffic on City streets is restricted to specific routes that are designated for thru traffic of trucks over three tons; the truck network system is identified in the City’s Municipal Code.
- 7 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 8 The comment references concern about proposed commercial north of the freeway and warehousing south of the freeway (which is part of the existing General Plan), but does not raise a specific issue regarding the content of the EIR. Currently no amendments are proposed to the noise ordinance; however, the General Plan includes a number of policies intended to ensure compatibility between residential and commercial and warehousing uses.
- 9 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

Robinson GPU Opposition

all living in relatively quiet, safe, crime free neighborhoods. There are even group homes here. Wildlife co-exist and are an important part of our neighborhoods. Night skies are highly valued.

8 cont.

We are an area that the city should value for its uniqueness and what it offers to those who chose not to live in high density areas or next to warehouses/commercial businesses. Your plan as written seeks to destroy all that we value and will open the way to rezoning our remaining lots to commercial or small lots. You will in essence violate your own goals with these changes therefore the 2006 general plan needs to remain in place.

**LIVABLE NEIGHBORHOODS** • Recognize that housing affordability is critical so people can grow up and grow older in Moreno Valley • Provide housing adapted to our future needs and lifestyles • Create opportunities for neighborhood interaction • Prioritize safety on roads, near schools, in public places, and neighborhoods • Promote active lifestyles with trail connections, par course courses, and other recreational amenities • Prioritize clean air, water, fresh food, and community health • Maintain roads in good condition, improve traffic circulation, and plan for new technology that optimizes mobility • Ensure Moreno Valley is livable and welcoming for seniors, veterans and other special needs groups.

EIR Land use (e) analysis regarding neighborhoods- e. Neighborhoods- Why did the analysis lump the NE area into the SE neighborhood? The NE is a separate neighborhood consisting of semi-rural, large lot, animal keeping residential areas nothing like what the SE has been relegated to (warehouses, 24/7 harmful noise/pollution, ruined health and quality of life). The NE neighborhood character needs to be protected and valued for its uniqueness not destroyed by irresponsible planning. Our neighborhood is all that is left of what had been promoted as Rancho Belago the "Beverly Hills" of Moreno Valley. Had the 2006 general plan (final build out plan) been adhered to, the east end of the city would have been developed into a wonderful and highly desired neighborhood of high end homes, large lots, animals, schools, offices and open spaces. Poor decision making (and campaign donations) obliterated that vision and condemned the SE to warehouses encroaching into established neighborhoods and eliminating residential lots. The health and quality of life of the SE residents will be ruined so why would you want to continue the encroachment to the north? Why are you willing to destroy the one remaining unique and desirable area of our city? All analysis say that there will be significant negative impacts should this area be rezoned therefore the 2006 zoning needs to be retained.

10

GP 24- your land use pie charts are misleading as they don't appear to include all the new warehouses. The WLC alone will take up approximately 7% of the city land. Add in Festival and MV Trade Center and other new warehouses and the number is much higher. I asked the city planning department to explain the missing warehouse numbers but did not get a reply. This document should not have been published with misleading information.

11

GP 30 Residential neighborhoods form the basic fabric of the community. These are areas of the city characterized primarily by housing, parks, and community facilities. Neighborhood boundaries are based on the historic development pattern, subdivision boundaries, and local tradition. **Each neighborhood has its own distinct character**, defined by the buildings, streets, and public places, as well as by the people who live there.

12

The NE character has been defined as large lots and animal keeping therefore you need to preserve not destroy our sense of community character. Why does the city keep trying to destroy our unique character? Please follow your own claims and deny the commercial and R10 zoning in the NE both of which completely conflict with our current land use with tremendous environmental negative impacts.

- 10 The commenter references the description of neighborhoods which are grouped into general areas to allow concise description of the various neighborhoods in the City. EIR analysis provides appropriate level of description of communities and the City recognizes the uniqueness of the northeast area. Section 4.11.5 identifies numerous General Plan policies that would serve to minimize adverse land use impacts to communities. With implementation of General Plan policies, the EIR concludes land use impacts would be less than significant.
- 11 The land use charts referenced by the commenter are intended to represent existing conditions. Since the WLC warehouses are not constructed, those are not part of the existing condition and are excluded from the charts.
- 12 Comment noted, the intent of the General Plan land use changes is not to destroy the unique character of the NE area. Numerous General Plan policies are provided to ensure compatibility between land uses. The comment does not raise a specific issue regarding the content or adequacy of the EIR.

Robinson GPU Opposition

**4.11.5.2 Topic 2: Conflicts with Applicable Plans and Policies**

*Would the project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? YES*

LCC.2-21 Orient residential uses to the street and discourage the use of walls and fences. Employ a variety of techniques to buffer residential uses on the corridors from traffic and noise, including setbacks, landscaping, stoops, and raised entries.

How do you intend to protect residential property from 24/7 commercial noise? The city has failed to protect NE residents from the incessant sleep disrupting noise from Solaris Paper Co and also failed to protect residents from 24/7 noise from the warehouses encroaching into their neighborhoods. Our 2006 general plan did not allow warehouses into residential areas.

**Goal**

LCC-3: Build a distinctive sense of place and pride in Moreno Valley.

How do warehouses build a sense of place and pride for the residents of Moreno Valley?

**General**

**Policies**

LCC.3-1 Insist on high-quality development that is sensitive to surrounding context throughout the city and particularly in centers and corridors. How will commercial operations in the NE neighborhoods be sensitive to us? The negative impacts associated with commercial businesses can't or won't be mitigated.

LCC.3-2 Use development standards to ensure smooth transitions for areas that border one another so that neighborhoods and districts maintain their unique qualities while being compatible with one another.

How do R10 and commercial allow the NE to maintain their unique qualities? What unbreakable guarantee will the city provide that no more lot shrinkage will be allowed? The R10 is not needed and is not compatible with R2 lots and animal keeping areas and it will divide two very nice well established R2 neighborhoods. R10 is not transitional, but an extreme change.

How will the commercial designation be compatible to our neighborhood? How will you "transition" commercial next to the Sterling Ranch and Deane Ranch communities? What unbreakable guarantee will be provided to prevent commercial from creeping north to Ironwood and beyond?

LCC.3-17 Screen and buffer nonresidential projects to protect adjacent residential property and other sensitive land uses when necessary to mitigate noise, glare and other adverse effects on adjacent uses.

There is absolutely no way that you can or will use to protect our neighborhood from all the severe negative impacts that commercial and R10 will inflict on our neighborhoods. This Policy is impossible to fulfill.

**Goal**

LLC-4: Expand the range of housing types in Moreno Valley and ensure a variety of options to suit the needs of people of all ages and income levels.

How does eliminating two very important housing elements- executive and animal keeping large lots in the NE conform to goal LLC-4?

LCC.4-2 Promote the development of a greater variety of housing types, including single family homes on small lots, accessory dwelling units, townhomes, lofts, live-work spaces, and senior and student housing to meet the needs of future demographics and changing family sizes.

**"Therefore, the project would not cause a significant environmental impact due to a conflict with any applicable plans, policies, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant."**

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13 The City's Noise Element and Noise Ordinance are key regulations to protect residential areas for noise. Additionally, as future development is proposed adjacent to residential uses, applicable General Plan policies such as the referenced LCC.2-21 will be applies to ensure development design mitigates noise impacts to the extent feasible.

14 The comment references a number of proposed General Plan policies and questions how they will be implemented to ensure protection of communities, but does not raise a specific issue regarding the content of the EIR . Implementation of General Plan policies will occur on a project by project basis as future development is proposed.

15 This comment does not suggest an inadequacy in the analysis of the Draft EIR. The Draft General Plan does not eliminate executive and large lot animal keeping lots. A small area of residential density changes are proposed north of SR-60 with the remaining large lot areas remaining as currently planned. Additional housing density is needed to meet the City's RHNA allocation.

Robinson GPU Opposition

The bold statement above is false as it pertains to the NE area. How can the addition of R10 properties not have a significant negative impact? They will increase noise, traffic, night sky loss, crime etc. Why are you promoting "a greater variety" of housing yet omitting the large lots valued in the NE end?

"Outside of the Concept Areas and specific plan areas, the 2021 GPU envisions new development on vacant parcels in a manner consistent with the existing land use pattern and character of the surrounding area."

What unbreakable guarantee will be provided that the above statement will be adhered to? What will prevent the commercial and R10 designations to continue into the rest of the NE area? Give and inch and we know you will give a mile effectively destroying a very desirable, unique community. We have no reason to trust the city staff and officials as we've watched you destroy the SE neighborhood with warehouses contrary to the land uses, general plan, specific plans that were in place. What guarantee will be provided and enforced to stop the use of campaign donations to solicit a vote to allow more commercial and higher density homes in the NE? When will people over profits be the top priority over pay to play?

GP31- land use map

Again it appears that the county land has been annexed into Moreno Valley inappropriately. I spoke with a resident who lives there and he never approved annexation into the city. Additionally city staff as well as former council member Thornton will not/would not go up there to assist residents as it is county.

Has the city annexed the county land in the area of Walther/Sean Ct./Harry Keith? If so, when did this occur? City staff still refuse to help the residents in that area as they say it is county.

This map shows an Aquabella Specific Plan area. Mr. Benzeevi did not renew his extension on this plan when it expired (he had not done the required improvements to warrant an extension), therefore it should have been excluded, not protected from other uses and it should have not been falsely labeled as having an approved SP. Why did the Aquabella land get special treatment and protection? The Aquabella land is the perfect location for high density homes as it is near transportation, hospitals and amenities. It appears Mr. Benzeevi is again getting special treatment and it's a conflict of interest to have him on the committee. Mr. Ormsby concurred that there is no Aquabella SP in place.

"With regard to your questions, I conferred with our Planning Division staff as I was not familiar with an approved project northerly of the Kaiser hospital/medical complex. Based on their input, I have confirmed that there have been no recent changes to SP218 that would allow additional commercial uses. Regarding the area that you mentioned northerly of Kaiser, there was an implementing application for a residential project approved for this site shortly after Aquabella was adopted. The rough grading for Aquabella that took place in 2007 appears to reflect the footprint of this project. The approval for the project has expired. Therefore, there is no approved project northerly of Kaiser hospital.

Aquabella is included within the Downtown Center designation of the proposed General Plan update which is currently available for public review at [www.moval.org/2040](http://www.moval.org/2040). The City staff is currently working on the implementation of zoning to implement the Downtown Center designation. We anticipate that a Specific Plan amendment/Area Plan would be needed in the future for the Aquabella Specific Plan to achieve consistency with the Downtown Center.

If you have any additional comments or questions, please let me know.

Chris

16 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

17 The General Plan maps do not appear to show the area referenced by the commenter as being annexed into the City. The remainder of the comment is regarding the Aquabella Specific Plan and includes correspondence with City staff responding to questions about the status of this plan. The comment does not raise an issue regarding adequacy of the EIR.

Robinson GPU Opposition

Chris Ormsby  
Senior Planner  
Community Development  
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The draft EIR document also touts the 2005 "Aquabella Specific Plan" another erroneous and misleading addition. The plan was for 2900 dwelling units that there has been ample time to build. There is NO Aquabella SP for the downtown corridor.

**j. Aquabella Specific Plan (SP 218)**

This specific plan was prepared by a developer and was adopted by the City in 2005 for the development of a gated active-adult community containing 2,900 dwelling units on approximately 730 acres near the Kaiser Permanente Medical Center between Brodiaea Avenue and Iris Avenue. Site grading began two years following specific plan adoption but the project was put on hold due to economic recession and slowdown of the housing market.

Since the city is including this SP in the EIR why haven't they required him to build it? Other builders have continued to construct houses in many areas of the city and the original recession stated was over for many years.

**d. Nason Street Corridor Plan**

Why does this section neglect to state that the city sold their land at Nason/Alessandro where the downtown center is supposed to go? Should the new land owner decide he doesn't want to build the downtown center as developed by all our public meetings, what guarantee is there that it won't turn into something else? City officials and planners have a bad track record when it comes to following the plans and regularly state that "it's his land, he can do what he wants" when it comes to rezoning and violating the general plan.

GP 33- You've painted a rosy picture of what commercial use could include. In reality "Commercial land can be any plot or section of land used for commercial purposes and intended to generate a profit. This means that the land hosts warehouses, industrial property, retail stores, parking lots, malls, hotels, office buildings, and medical centers." It's common knowledge that Mr. Benzeevi refused to have a truck stop/fueling station on the wic property so how will you protect our community against such a business?

**Front page of the Press Enterprise Sunday May 16, 2021- BLOOMINGTON Opponents of truck fueling station cry foul. Residents say they were expecting retail stores and sit-down restaurants**

We need definitive enforceable planning decisions that prohibit businesses such as truck stop, gas station, cannabis, fast food, or warehouses. We have plenty of fast food, gas stations etc., on the south side. Fine dining and high end retail will not be supported especially if they are near Theodore, the road to the dump. We have empty commercial buildings at Stoneridge as well as other commercial and we should not be building more to siphon off their income. Only those residents who live here and who will suffer the negative impacts should be allowed to determine what type of commercial buildings will be permitted. Will the city guarantee us that protection? As you noted, this is a rural area so anything other than the already allowed office buildings should be prohibited. Any commercial activities need to shut down at 10 pm and not reopen until 7 am. There

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18 The area referred to as Aquabella Specific Plan is designated as Specific Plan, and as such is appropriately referenced despite there being no adopted Specific Plan in place. The designation is provided to identify that in order to develop the area, a Specific Plan would be required. The Draft EIR acknowledges that Specific Plan was never adopted and development has not proceeded in this area. The City cannot force land owners to develop specific pieces of land.

19 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

Robinson GPU Opposition

are no truck routes in this area, therefore only business that don't need truck service can be allowed. How will the city enforce the truck routes when they are unable/unwilling to do so currently? Why did the draft EIR neglect to address the increase in truck traffic, pollution, noise, and road dangers this rezoning brings to our neighborhood? Any commercial business effectively ruins the area for rural homes/animals so will you be allowing the commercial to creep up to Ironwood and beyond? The commercial aspect in the land use plan needs to be removed as it is contraindicative to our rural area. The 2006 general plan needs to be retained.

20

A very serious question I asked during the process that was never answered- Are the homes on Redlands Blvd between the freeway and Hemlock being rezoned to commercial as the map shows? If so, have they been notified of the change and how it affects them when they sell? If not, why has that glaring error not been corrected after it was pointed out many times?

21

Will the city be proactive and amend the noise ordinance to prohibit commercial and warehouse noise from 10 pm-7 am since they have been violating our 2006 general plan and encroaching into residential areas?

22

**HOV 3 OFFICE COMMERCIAL HOV 3** This designation provides for a distinctive employment or educational campus at the eastern gateway to the city. Primary permitted uses include office, educational, and/or research and development facilities organized in a clustered development pattern with intervening areas of landscaped open space. Auxiliary commercial uses, including restaurant, retail, and service uses are also permitted. The architectural style of development should reinforce the rural character intended for the surrounding area. The maximum permitted FAR in the HOV3 designation is 0.4. On smaller parcels, additional FAR may be permitted to achieve the desired vision for the area.

How will you protect us from unwanted noise and intrusions into our sensitive area to promote a healthy living environment in the NE? How will you enforce thoughtful planning and design when you intrude into residential areas with warehouses and commercial businesses? Our neighborhood is one of the best in the city yet this proposal changes it to a less desirable and unwelcoming place to live. Addition of commercial noise creating businesses will effectively drive out those who would otherwise build on large lots and raise animals. The city continues to allow development that makes people embarrassed to say where they live. You can turn this around by respecting the residents and leave the 2006 general plan for the NE in place.

23

Unwanted noise can be defined as a sound or series of sounds that are intrusive, irritating, objectionable and/or disruptive to daily life.

The paper company and trucks in residential areas are examples of unwanted noise that is not mitigated.

24

Consequently, noise standards for sensitive land uses are more stringent than for those at less sensitive uses. To protect various human activities in sensitive areas, lower noise levels are generally required.

**4.13.1 Existing Conditions**

**4.13.1.2 Ambient Noise Measurements**

The city relies on published numbers dictating what permissible noise levels are allowable. These arbitrary numbers decided upon by researchers who clearly don't live in an area that is subject to incessant noise that disrupts sleep and limits our rights to enjoy our property. Loss of sleep equals lower quality of life as well as health issues. This report and the city rely on these numbers to deny us remedies to unacceptable noise levels. The council and staff live in established neighborhoods that are not being encroached on with operations that create disruptive noise 24/7 thus they don't care.

The tables in this section have some glaring omissions and errors as follows:

20 The Draft EIR analyzed the potential impacts associated with land use changes north of SR-60. Trip generation estimates were used to estimate noise levels on area roadways as detailed in Draft EIR Section 4.13. The comment raises other concerns about pollution and road dangers but does not raise a specific concern regarding the adequacy of the EIR.

21 The General Plan Update does not include rezoning, but a future rezoning action would occur after adoption of the General Plan to ensure zoning is consistent with new commercial areas. All community members have been provided adequate notice of the proposed land use changes. Any existing residential use within areas proposed for commercial can remain as residential despite the updated plan.

22 The project does not include amendments to the Noise Ordinance.

23 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

24 This comment cites text from the Draft EIR noise section and raises concern about the threshold used to determine allowable noise levels. The City has the authority to set thresholds of significance to determine potentially significant noise impacts. The applicable noise thresholds are detailed in Section 4.13.5 of the Draft EIR. The comment raises concern that noise measurements are not taken from the Solaris paper company. The EIR takes appropriate noise measurement throughout the City considering the programmatic nature of the analysis. Site specific measurements at businesses of concern is not feasible at a programmatic level of analysis. As no specific land uses are proposed with this action and future projects will require a subsequent environmental review including detailed noise analysis and measurements.

Robinson GPU Opposition

Suspiciously missing in the noise table is the Solaris paper company that is disrupting our sleep.

A fifteen minute traffic count at only 8 locations is statistically insignificant and not valid to base ambient noise on.

The claim that manual counts of freeway traffic can't be done is false. I personally worked for Counts Unlimited for many years and performed freeway traffic counts which even included occupancy counts and vehicle types.

Redlands Blvd north of the 60 was not included in the study yet noise from trucks is keeping people awake at night now and will get worse with the additional warehouses in progress.

Trucks are illegally using Ironwood all day long and noise studies need to be performed there.

How can we trust your decisions when the data provided is incomplete or incorrect? What will the city do to start enforcing the truck routes and protect residential areas from unacceptable noise levels base on reality not some arbitrary table compiled by people who aren't subject to said noise levels?

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

How will the city mitigate the increase 24/7 noise of commercial buildings in the NE? "Normally acceptable" standards are not reality when one lives there. Our "normally accepted" standard is quiet that has now been violate by the Solaris Paper Co.

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

The city has failed us miserably in this category. How will the city change their current behavior to comply with N1-5? Will the city have better trained planning staff and inspectors who won't allow errors like the paper company with noisy apparatus inappropriately allowed outside the building? Will the city reverse its appointments to the planning commission to appoint more qualified commissioners who actually read, study and research the projects before them rather than rubber stamp everything through and "let them get settled in court"? Will the city amend our municipal code to limit the operating hours/noise creation of warehouses and commercial buildings encroaching into our residential neighborhoods? Including the words "if feasible" indicates that we won't be protected from excessive noise thus the 2006 plan for the NE area needs to remain!

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

Will the city actually follow this? Show us you're serious by taking care of the paper company noise.

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

How will the city protect the existing residents from the new noise generated by allowing commercial businesses into the NE area? Existing homes should be the priority as it is their quality of life that is being threatened.

***Goal***

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

24  
cont

25

25 The referenced General Plan policies in this comment would be applied during the discretionary review of future development projects. The comment also references concerns about the paper company noise, which is part of the existing condition and not within the scope of the EIR analysis.

Robinson GPU Opposition

Clearly the addition of commercial 24/7 businesses into the NE area will substantially have a severe adverse effect on our community and not mitigatable therefore the 2006 plan needs to be retained.

*Policies*

N.2-1: Use the development review process to proactively identify and address potential noise compatibility issues.

Will the city change how it's been rubberstamping projects and actually thoroughly vet projects and address the issues? Standard practice for some time now has been to allow severely negative impacts to proceed and basically say too bad.

N.2-2: Continue to work with community members and business owners to address noise complaints and ensure voluntary resolution of issues through the enforcement of Municipal Code provisions.

Will the city actually follow this and enforce the code? So many violations of Municipal Code are occurring at city hall led by staff and officials that it's difficult to trust.

*Actions*

N.2-A: Continue to maintain performance standards in the Municipal Code to ensure that noise generated by proposed projects is compatible with surrounding land uses.

How do you justify that commercial and warehouses are compatible with surrounding land uses when they are being allowed in residential areas? If this is truly a goal, why would you include commercial businesses in the NE where office is the only compatible zone? Offices are compatible as they'll operate during normal hours, limit traffic and noise, and protect our night skies. Commercial is incompatible.

N.2-B: Update the Municipal Code to establish controls on outdoor noise in public places, such as outdoor dining terraces in commercial mixed use areas, public plazas, or parks. Controls may include limits on noise levels or hours of operation.

Why are only those few designations listed for an update in the municipal code when the real offenders are warehouses and 24/7 commercial operations? Why won't the city amend our noise codes to limit their hours of operation to protect the residents?

Traffic Noise projections:

Project buildout would result in a significant increase in ambient noise levels at the roadway segments listed below. These roadway segments would not be impacted under buildout of the existing 2006 General Plan:

- o Alessandro Boulevard – Moreno Beach Drive to Quiney Street
- o Cactus Avenue – Kitching Street to Lasselle Street
- o Cottonwood Avenue – Indian Street to Ferris Boulevard
- o Genetian Avenue – Indian Street to Ferris Boulevard
- o Iris Avenue – Nason Street to the Moreno Valley Medical Center
- o Ironwood Avenue – Nason Street to Moreno Beach Drive
- o John F Kennedy Drive – Kitching Street to Lasselle Street
- o John F Kennedy Drive – Heacock Street to Indian Street
- o Kitching Street – Cottonwood Avenue to Alessandro Boulevard
- o Lasselle Street – Iris Avenue to College Drive
- o Lasselle Street – Eucalyptus Avenue to Dracaea Avenue
- o Lasselle Street – John F Kennedy Drive to Gentian Avenue

Once again, retention of the 2006 plan is superior for the NE area as the proposed plan would result in significant ambient noise on Ironwood from Nason to Moreno Beach.

26

26 This comment does not suggest an inadequacy in the analysis of the Draft EIR. The referenced General Plan policies would be applied during the discretionary review of future development projects.

27

27 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.



Robinson GPU Opposition

**4.13.8 Mitigation**

**4.13.8.1 Topic 1: Increase in Ambient Noise**

**a. Traffic Noise**

Impacts associated with the increase in ambient noise and land use compatibility would be significant without mitigation. For existing noise sensitive land uses, possible noise reduction measures would include retrofitting older structures with acoustically rated windows and doors featuring higher Sound Transmission Class ratings, which is a measure of exterior noise reduction performance. However, there is no mechanism in place for implementing such a retrofit program. **Because the significant noise impacts would be to existing homes and other noise-sensitive uses in an already urbanized area, there is no feasible mitigation. Therefore, impacts to existing sensitive land uses would remain significant and unavoidable.**

28

Will the city follow their own words and protect the NE area by voting no to the proposed plan as the 2006 plan protects this area? How will you justify a yes vote knowing you are ruining the health and quality of life of the residents in our unique established neighborhood?

Highway Office/Commercial--- **Noise compatibility impacts at the Highway Office/Commercial Concept Area would be potentially significant.**

Residential Density Changes- South of Ironwood Avenue and north of SR-60 along Moreno Beach Drive. Future vehicle traffic noise levels in this area would range from less than 60 CNEL to 75 CNEL, and may exceed 75 CNEL at areas closest to SR-60. **Noise compatibility impacts at proposed residential uses would be potentially significant.**

**Traffic noise mitigation in the NE area will be impossible, therefore the 2006 general plan needs to be retained for this area.**

**ADDRESSING NOISE CONCERNS** As in any bustling and vibrant city, some noise is inevitable in Moreno Valley. Having systems in place to minimize unwanted noise before it occurs, and to manage noise concerns when they arise is important to ensure a healthy and economically dynamic future.

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

The paper company has had an extreme adverse effect on our quality of life and commercial will compound the problem. How will you ensure that there will be no additional substantial and adverse effects? The 2006 plan protects us the current proposal and staff do not.

**Goal EJ-1: Reduce pollution exposure and improve community health.**

**The proposed project violates both of the above goals and thus needs to be rejected for the NE area.**

**4.13.9 Significance of Impacts after Mitigation**

**4.13.5.1 Topic 1: Increase in Ambient Noise**

**a. Traffic Noise**

Impacts to existing sensitive land uses located in areas that would experience a significant increase in ambient noise levels exceeding the applicable land use and noise compatibility level **would be significant and unavoidable at this program level of review.**

**The draft EIR should make it clear that traffic noise mitigation in the NE area will be impossible, therefore the 2006 general plan needs to be retained for this area.**

28 The comment cites information from the Draft EIR and expresses concern about the proposed land use plan, but does not raise an issue with regard to the adequacy of analysis.

Robinson GPU Opposition

c. Stationary Noise

A significant impact would occur if implementation of the project resulted in the exposure of people to noise levels that exceed property line limits established in Municipal Code under Title 11 Peace, Morals and Safety, Chapter 11.80, Noise Regulation. Stationary sources of noise include activities associated with a given land use. **For example, noise sources from commercial land uses would include car washes, fast food restaurants, auto repair facilities, parking lots, and a variety of other uses.** Noise generated by residential or commercial uses is generally short-lived and intermittent, while noise generated by auto-oriented commercial and industrial uses is usually sporadic, highly variable, and spatially distributed. Noise sources from industrial uses would include mechanical equipment, generators, and trucks. Industrial uses are largely concentrated in the southwest of the city, adjacent to MARB and I-215. Additionally, significant light industrial uses have been approved at the World Logistics Center site at the eastern edge of the city. While industrial uses are generally concentrated at the periphery of the city, the potential for noise conflicts exists where these uses would abut residential areas. **Additionally, potential noise conflicts could occur in mixed use areas where residential uses are located in close proximity to commercial and retail uses.**

28 cont

The proposed plan has commercial uses abutting residential with potential to creep further north once the "gate" is open. The city has failed to protect other neighbors from unreasonable noise from warehouses and commercial activities allowed to encroach into their residential neighborhood so how can we trust the city to follow their own codes? The 2006 general plan should be retained for the NE area as it protects the residents from non-stop commercial noise for the moment.

GP 35- R10

The R10 designation for land along Moreno Beach is completely inappropriate and not part of our neighborhood community character. Mr. Chung has made it clear he loves giant homes on small lots so this is most likely for his financial benefit and a conflict of interest to have him on the committee. These large homes/small lots in other areas contain multiple families (related and unrelated) as well as some being used as apartments renting out individual rooms. All these additional people add up to additional cars and not enough parking within the development. This leads to parking on other city streets creating hazards for other residents. These huge homes will also be overlooking the homes/yards of residents on Pettit and Oliver blocking their views and intruding on their lives. These higher density homes bring in excessive traffic, crime, noise, trash and disrespect for the existing lifestyles and danger to the animals in the area. This is a rural area and needs to remain so as we're the last area in the city. This will also open the floodgates to rezone all the remaining large lots/animal keeping to small lots. Will the city guaranty that won't happen? We received a promise from a previous council that there would be no more fights to preserve the large lots/animal keeping land from LaSalle to Theodore north of the 60. Please honor that promise and preserve our neighborhood by retaining the 2006 general plan.

29

The city selectively uses RHNA to claim they need to rezone larger lot areas into higher density housing. If they are truly worried than why have they continued to rezone residential land to warehouses, most recently the Moreno Valley Trade Center and of course all the residential land lost to wlc? The report states that Moreno Valley will exceed the required housing therefore there is no need to change our neighborhood to R10.

The city also selectively claims that developers won't make enough money building on larger lots. When will the city start putting people over profits? Developers can sell one acre and half acre lots and recoup their initial investment and we would have a wonderful neighborhood of unique homes rather than cookie cutter developments. When will integrity return to city hall? We have a planning staff ordered to put developers over residents, a planning commission as well as some council members/staff who don't honor their oath of office/ethics training and fail to do their due diligence resulting in the rubber stamping of projects that should not have gone forward and council members whose allegiance is to their campaign donors.

29 The comment raises general concerns about traffic, crime, noise, trash and impacts to community character, but does not raise a specific concern regarding adequacy of the EIR, therefore a specific response cannot be provided.

Robinson GPU Opposition

GP 53- This general plan violates the insistence to remain sensitive to the surrounding context. Our NE context is large lots, animals, quiet, safe, clear night skies etc. This plan destroys this with 24/7 commercial noise/lights/trash/traffic as well as small lots leading to the destruction of our community character. There is absolutely no compatibility between our existing community and the proposed community, thus you're violating both 3.1 and 3.2.

LCC.3-1: Insist on high-quality development that is sensitive to surrounding context throughout the city and particularly in centers and corridors.

How do cookie cutter higher density large homes on small lots and commercial building show sensitivity to our existing neighborhoods and zoning? Why is it so important to destroy our uniqueness? Our area is a gem of the city and should be retained, protected and promoted as such.

LCC.3-2: Use development standards to ensure smooth transitions for areas that border one another so that neighborhoods and districts maintain their unique qualities while being compatible with one another.

How can you possibly make commercial businesses compatible to the NE community character? You can't and this plan will be the beginning of the end of our unique area. Retain the 2006 plan.

GP 54- How will the city buffer our residents from the negative impacts of the proposed changes? You can't and won't as proven by the paper company unmitigated incessant noise that disrupts resident's sleep and daily lives.

LCC.3-17: Screen and buffer nonresidential projects to protect adjacent residential property and other sensitive land uses when necessary to mitigate noise, glare and other adverse effects on adjacent uses.

GP 56- Glaringly omitted from the proposed housing types in 4-2 are our executive type housing that will encourage business owners to live here and also missing is our large lot animal keeping homes. Why has this general plan eliminated these important types of diverse housing? Our large lot homes sell quickly which demonstrates they are in demand. The absence of our housing types from this proposed plan again highlights the bias of the committee and lack of a NE representative on the committee, Future demographics will contain executives and equestrians unless this passes and we're forced out. Again, R10 is inappropriate for this area and needs to be removed. The 2006 general plan is more appropriate and addresses more diversity.

LCC.4-2: Promote the development of a greater variety of housing types, including single- family homes on small lots, accessory dwelling units, townhomes, lofts, live-work spaces, and senior and student housing to meet the needs of future demographics and changing family sizes.

GP 58- Economic Development – again there is false information with the claim of 20000 jobs from 2015-2020. No one at city hall can give any facts on those supposed jobs, nor do they subtract for all the jobs lost. Even more interesting is the table that shows 43% of all jobs will be in the warehouse and transportation field. Our city staff and officials have sadly relegated our residents to lower paying warehouse jobs when with ethical leaders we could have been so much more. This shows even more that we need to stop allocating more land to warehouses. The limited jobs in commercial businesses don't fulfill the promise of higher paying jobs and thus are not the answer when all the negative impacts are properly assessed. Our neighborhood needs to remain as is with the 2006 general plan maintained.

GP 74 Map incorrectly marks a street connecting Locust to Ironwood between Moreno Beach and Redlands. There is no road that currently goes through. How much did we pay the consultant to have so many errors in their report?

GP80- Locust St experiences high speed cut through traffic daily and for over 20 years residents have asked for help from the city. Residents have offered possible solutions and offered to pay for it. The city has refused

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30 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

31 The comment does not raise an issue regarding the adequacy of the EIR. The referenced connection from Locust to Ironwood is a planned roadway and not a mapping error.

32 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

Robinson GPU Opposition

to assist us. This states the city has street calming measures so when will the city "calm" Locust? If not now, how can we expect any relief if these changes occur? Our neighborhood is especially vulnerable as we have no sidewalks and the city has failed to build the planned trail system here. Residents walk, jog, walk dogs, walk with strollers, bike ride, horseback ride, daily and deserve street calming too. We also have our wonderful burros who get hit/side swiped often and wander into the field to die. How will you protect the residents on Hemlock if the road is punched through from Moreno Beach to Theodore? Will they be met with the same resistance from city hall as the Locust residents have? Will the city be proactive and protect them with speed humps prior extending the road through their safe, quiet, relatively crime free neighborhood?

32 cont

**LOCAL ISSUES: BYPASS TRAFFIC** Moreno Valley experiences cut-thru traffic by vehicles during peak commute hours on the SR-60 and I-215 freeways. Drivers use city streets to bypass freeway congestion, thereby creating higher levels of congestion and greenhouse gas emission in the process. Traffic calming measures can improve the safety of vulnerable users on city streets, such as older adults and children who may use active modes of travel, while at the same time reducing the desirability of cut-thru traffic on roads with reduced speeds. The City already deploys several well-known traffic calming measures on applicable street classifications such as speed humps, lane and road diets, and speed feedback signs. The City can revisit existing traffic calming policies and other recommended methods by the Institute of Transportation Engineers (ITE) in order to strategize for additional discouragement of cut-thru traffic.

**4.15.1.3 Schools**

**a. Moreno Valley Unified School District**

The draft EIR neglects to mention the exact location for the next high school. MVUSD purchased land on the north side of Ironwood between Moreno Beach and Redlands Blvd directly north of the proposed commercial rezoning. (red box is school site, green line shows commercial area).

....an additional high school is also envisioned in the facilities master plan, anticipated to serve growing needs in the northeastern area of the city in the next 20 years....

33



Why wasn't this addressed in the EIR and the negative effects of commercial impacts on the school site/children/staff? The commercial noise/pollution/traffic will carry north and could be quite disruptive to the school and the students. The additional school traffic will also add additional negative impacts to our

33 School planning is led by school districts and ultimate school development will require a site specific environmental analysis with the school district as lead agency. Identification of potential school site locations is outside the scope of this EIR.

Robinson GPU Opposition

community (but preferred to the negative impacts of commercial) so why wasn't that potential discussed for our area? Please remember that MVUSD had land and planned to build new schools in the master planned community in the SE end of the city, but were driven out by Mr. Benzeevi when he convinced the council to permit a warehouse.

4.16.1.2 Housing/Employment Dynamics

Based on 2017 American Community Survey and the 2017 Longitudinal Employer-Household Dynamics Origin Destination Employment Statics, commute patterns for employed city residents are as follows:

- 30 percent of residents travel less than 10 miles to reach their employment.
- 30 percent of residents travel between 10 and 24 miles to reach their employment.
- 40 percent of residents travel 25 miles or more to reach their employment.

Over two-thirds of city residents travel more than 10 miles to reach their places of employment.....

This issue has been beaten to death and over used when convenient. The city will ignore the housing element in a rush to rezone residential land to warehouses and then use it when they want to rezone to higher density housing. What the city neglects to report in their analysis is that over two-thirds of the city staff do not live in the city (when last received a report). Therefore there are many people commuting into our city for work. How many cities have appropriate jobs for all residents? Our highest paid staff do not live here and do not suffer the consequences of poor development decisions. From the internet we found the following (and there could be some errors):

- Interim city manager Mike Lee- Chino Hills
- Former city manager Tom Desantis – Temecula
- Former city manager Michelle Dawson- Riverside
- Interim city attorney Steve Quintanilla- Palm Springs area
- City clerk Pat Jacques-Nares- Anaheim
- Interim assistant city manager/public works Michael Wolfe- Orange
- CFO Brian Mohan- Redlands
- Former CFO Marshall Eyerman- Winchester
- Parks Director Patti Solano- Meniffee
- Asst Parks Erica Green – Riverside

Commuting does not seem to be an issue this sample of city staff shows. If they can live in other cities and commute to Moreno Valley for their chosen job, why is it wrong that our residents do the same? The jobs these warehouses provide are not the jobs that are going to keep people here.

GP94- Parks Map

As you can see by the map, the north side of the freeway is woefully under represented with parks and designated open space. Again, the city has been requested to purchase the land on Ironwood at Nason for an open space nature park to serve our community. Trails are already present, our master plan trail bisects the property, lots of wildlife and a natural spring. Residents have volunteered to make kiosks with informational material, provide benches and help maintain.

GP 96 lists many multi use equestrian trails but they've never been connected up as required by the master planned trails. When will the city get them connected? Why do the equestrian activities, maintenance, trail completion and housing continue to be moved to the bottom of the list? Why are you neglecting an entire category of residents?

GP 99- When is in the future? I've been here 24+ years so it seems like there should have been major progress on connecting the west and east sides of the city. A better system needs to be in place to complete

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34 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

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35 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

Robinson GPU Opposition

existing projects with grants/dif/ etc. before allocating money to a new idea unless it's required that the developer provide the amenity.

The master plan for bikes came along long after the multi-plan trail system that included equestrians. Why has the bike plan given priority over the multi-use trails? We had the potential to have a trail system that would attract residents and visitors but it has been neglected.

Our master planned trail system includes a safe overpass at Theodore and a trail all the way to a planned trail head at Davis that will provide a system to ride from the north side to the south end and over to Lake Perris. Has this safe overpass been incorporated into the interchange design as planned? Our original overpass was to be at Sinclair but Mr. Benzeevi had it moved to Theodore.

The draft makes note of safe routes for bikes and pedestrians and protection from trucks. The same protections and routes are needed for equestrians so why were they eliminated from the plan? How will city make sure our trail from north to south is built and that it protects all modes from truck dangers?

Expansion of the system is guided by the Master Plan of Trails, which envisions a 56-mile network of City trails in the future connecting Box Springs Mountain Regional Park with the Lake Perris State Recreation area through the northern and eastern portions of the city. As a condition of project approval for new development on parcels where the Master Plan shows a trail, the City requires trail construction consistent with adopted engineering standards. The network will be completed as development occurs and funding becomes available.

GP100- Maintenance of parks is a huge issue and they are not being maintained. Broken trail fences for over 10 years don't make a good impression on visitors and are also dangerous. Weeds are out of control on many parks. How will the city prioritize park maintenance and repairs? Again, funds are diverted to other areas and list should be kept so that improvements are made in order and not allow new projects to piggy back over the existing problems.

PPS 1-6: Prioritize the maintenance and, where feasible, improvement of parks and recreational facilities to ensure safe, attractive facilities that are responsive to community needs.

How will the city staff prioritize the maintenance to fix long standing disrepair?

4.17.5.1 Topic 1: Utility Infrastructure

Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The draft EIR neglects to mention that NE end of town is all on septic. The addition of R10 and commercial will necessitate the addition of sewers therefore there will be significant environmental issues that were not addressed.

This omission is critical and another flaw in the document that needs to be addressed.

GP157/158- BARRIERS TO COMMUNITY ENGAGEMENT

When designing community engagement, it is crucial to identify potential barriers and address them in implementation. There are a variety of reasons that influence why people do not participate in planning processes, including, but not limited to, those described

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36 Draft EIR Section 4.17.5 discusses the need to install improvements to sewer facilities to serve the proposed land use plan and therefore does disclose potential impacts associated with installation of utility infrastructure. This section was additionally clarified to identify the need to extend sewer lines north of SR-60 to serve future development. Future sewer line or other utility improvements would be analyzed at the project level associated with a future development application.

Additionally, the General Plan Parks and Public Services Element states that it is anticipated that sewer line improvements will be required in concept areas including the Downtown Center, Moreno Valley Mall area, and the Alessandro, Perris and Sunnymead corridors. To accommodate this new growth pattern, these areas, including a new 8-inch 12-inch sewer lines to collect wastewater and a new 21-inch trunk sewer to convey the flows to the wastewater treatment plant. All areas planned for development are within existing utility service provider service areas.

37 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR

Robinson GPU Opposition

below. Specific considerations that may require extra attention when engaging the Moreno Valley community are noted. By being aware of potential barriers to community engagement, the City can think strategically and creatively about how to address those issues and create truly inclusive planning processes.

**Fear of being judged, unsafe, or unwelcome**

We have rules and procedures for council meetings that are not followed and have allowed a certain group of people to verbally attack residents and council members whose viewpoints oppose theirs. Why aren't these rules followed? Why do we continue to retain staff who abrogate their job responsibilities and not follow rules/procedures? Residents are followed into the parking lot and threatened and have needed police escorts for protection. The attackers seem to be followers of Mr. Benzeevi who holds meetings to instruct them to continue to harass us until we quit participating. Until rules and procedures are followed and we have ethical, honest leadership at city hall people will continue to be unsafe and unwelcome and their voices silenced.

37 cont

**ENHANCING COMMUNITY ENGAGEMENT** While there is no single engagement method or "one size fits all" strategy that ensures effective community engagement, there are a variety of complementary methods that can enhance equitable community engagement. Equitable community engagement is the "practice of using multiple strategies to provide opportunities for all residents—particularly those historically excluded, under-represented, or under-resourced—to be informed and to participate in public planning and decision-making to achieve an equitable outcome." A range of strategies that can be employed to increase community engagement includes, but is not limited to, those described on the following page.

The first thing that needs to be done to enhance community engagement is to rescind the mayor's complete control over appointments to our commissions/committees/boards. He has denied appointments to most residents who have applied instead hand picking his friends/supporters/donors while neglecting to fill other seats. These groups are supposed to represent a wide range of our population not just those who share his narrow viewpoints. Many have quit applying and it's sad to hear them say "why bother, the mayor won't appoint me to anything as I don't support Iddo or the mayor". The GPU committee and planning commission are perfect examples of his bias and excluded any resident of the NE.

Our voice needs to be heard and respected. The rule that the council needs 3 votes to get anything on the agenda needs to be rescinded back to 2 council members so all districts and residents have a voice.

To be engaged, the public need to be notified. Our city selectively promotes certain activities endlessly while doing the bare minimum on other important events. Current occupants of city hall have personal agendas and want to restrict our involvement and input. Notification can and should be greatly improved.

GP160

◆ Transparency and Trust. Be clear and open about the process, and provide a public record of the organizers, sponsors, outcomes, and range of views and ideas expressed.

Residents no longer trust the occupants of city hall. Transparency is non-existent at city hall and the mayor is acting illegally as the city manager giving instructions to staff. The hostile and toxic work environment needs to end and those responsible need to be removed from city hall. His instructions to the interim attorney are clearly to prevent the public from receiving information such as refusing to provide the names of applicants for D2. So many more to list.

Brown Act violations have occurred for years. Decisions are being made outside of public meetings between certain council members and developers. Council agenda items are also pre-determined as evidenced by rubber stamping thru consent calendar. It's been obvious that ethics and oaths of office mean nothing to many at city hall.

Robinson GPU Opposition

Public records are denied on a regular basis.

The 5 day rule for agenda posting needs to be rescinded and returned to 12 days to provide residents ample time to read and research so that projects don't get rushed through improperly because residents didn't have enough time to respond.

37 cont

Transparency and trust have disappeared.

When will city hall actually follow what they write in their general plans? This section alone should stop any further decimation of our land with warehouses and unnecessary commercialization.

GP 170/171

The quality of the natural environment determines the quality of life in a community. A healthy system of open space lands, natural resources, and habitat areas will help ensure clean air and water while also providing recreational opportunities and scenic vistas. As the city and the region continue to grow, careful stewardship of environmental, cultural, and agricultural resources in the planning area will be needed, together with a focus on conservation of energy and water to provide a thriving natural environment for future generations.

38

Open space is a critically important resource for the health and success of any city. Access to open space for recreation provides residents with opportunities for physical activity and exposure to the natural environment, leading to a richer quality of life and a healthier community. Open space also provides important habitat for local plants and animals and allows for the natural recharge of groundwater, contributing to a healthy local ecosystem, and designating areas that require special management due to hazardous conditions as open space where development is restricted serves to protect public health and safety. These might include flood-prone areas, areas of unstable soil, watersheds, earthquake fault zones, areas of high wildland fire risk, and areas required for the protection of water quality.

In conclusion the proposed general plan update and draft EIR are not appropriate and do not protect the NE area of the city. CEQA identified two alternatives that do protect and preserve the NE area and should be adopted instead.

6.6 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify the environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives. The project itself may not be identified as the environmentally superior alternative. The Redistributed Growth Alternative is the environmentally superior alternative because it would incrementally reduce significant impacts associated with air quality, agricultural resources, biological resources, noise, and transportation. Although impacts related to cultural and tribal cultural resources would remain the same as this project, this alternative would reduce most significant impacts, but not to below a level of significance, while still meeting most objectives of the project. However, land within the Downtown Center is not housing ready, and would take more time and investment to accommodate housing units needed to achieve RHNA targets compared to what could be achieved along the Community Corridors proposed under the project. Therefore, the Redistributed Growth Alternative is not recommended for adoption, since it would not likely achieve the same level of housing needed to satisfy the RHNA requirements of the project within the timeframe required.

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38 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR

39 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.



Robinson GPU Opposition

As the draft EIR neglected to include the lack of sewer in the NE end, CEQA was unaware that the NE end is also not housing ready and would also require more time and investment to accommodate R10 housing. Additionally it should not be a concern as the GPU proposal results in an excess number of homes than required under RHNA. Therefore this is the appropriate alternative.

**6.5 Redistributed Growth Alternative**

**6.5.1 Description**

The Redistributed Growth Alternative would result in the same level of growth as the proposed plan, but would redistribute growth from the proposed Community Corridor Concept Areas to the Downtown Center Concept Area (Figure 6-2). This alternative would reduce the maximum permitted density and intensity in the Community Corridor Concept Areas, thereby reducing future development proposed along Sunnymead Boulevard, Alessandro Boulevard, Perris Boulevard, and Heacock Street by approximately 10 to 15 percent compared to the project. The reduced growth capacity from these areas would be redistributed to the Downtown Center Concept Area. This alternative would also remove a portion of the proposed Highway Office/Commercial Concept Area located north of SR-60 and the existing office and residential land use designations from the existing 2006 General Plan would be retained. Redistribution of land uses associated with this alternative would not alter the total amount of residential, commercial, and office land uses compared to the project.

SR cont

**6.4 Reduced Growth Alternative**

**6.4.1 Description**

The Reduced Growth Alternative would revise the proposed land use map to reduce the amount of employment growth compared to the project (Figure 6-1). This alternative would reduce the maximum permitted floor area ratio (FAR) proposed within the Community Corridors along Sunnymead Boulevard, Alessandro Boulevard, Perris Boulevard, and Heacock Street. This would reduce the amount of non-residential development within these Community Corridors by approximately 10 to 15 percent compared to the project. This alternative would also remove the proposed Center Mixed Use within the District Specific Plan area, and reduce the footprint of the Downtown Center Concept Area by approximately 111 acres. Additionally, a portion of proposed Highway Office/Commercial Concept Area located north of SR-60 would not receive this new designation, and instead the existing office and residential land use designations from the existing 2006 General Plan would be retained.

The proposed GPU changes to the NE area are clearly biased towards the interests of Mr. Benzeevi and Mr. Chung and for that reason alone should be rejected and an alternative approved.

Please take the correct and appropriate action and select an alternative that respects and preserves the NE area of Moreno Valley per the 2006 general plan and direct that no future rezoning will be allowed that will change the community character and uniqueness of this area.

Thank you,  
Lindsay Robinson  
NE resident

LETTER

RESPONSE

Letter I-43

From: [Dusan Stancic](#)  
To: [Chris Ormsby](#)  
Subject: Chris Ormsby - NE Moreno Valley alternative  
Date: Friday, May 14, 2021 8:00:17 AM

Warning: External Email – Watch for Email Red Flags!

Dear Chris Ormsby,

I am writing because I am not in favor of the changes to NE Moreno Valley, and I feel we should adopt CEQA's environmentally superior alternative that includes no changes to our area. I live here and this will affect my home, my life.

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I love where we live and we are so close to a natural preserve it is perfect for raising animals and a family. Adding the proposed lots for commercial usage will drive a lot of the people out of these parts. I've lived here for 35 years and I've seen how the city has changed. However, I feel we need to keep the NE end of Moreno Valley as beautiful as possible. It's historic and its the last remaining part of the city that is safe from the wave of crime that is occurring.

2

I ask for your help and to consider the alternative.

Thanks,  
Dusan Stancic

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

Letter I-44

From: [Cynthia Strbani](#)  
 To: [Chris Ormsby](#)  
 Cc: [Ulises Cabrera](#); [David Martinez](#)  
 Subject: Proposed 2021 General Plan Concerns  
 Date: Friday, May 14, 2021 4:16:54 PM

**Warning: External Email – Watch for Email Red Flags!**

Hello Chris Ormsby,

We have been instructed as concerned residents living in the northeastern part of Moreno Valley to write you with feedback/our concerns about proposed changes to the city's 2021 General Plan. As a Sterling Ranch homeowner, one home of 149 in our neighborhood, I am concerned, about new development in and around our homes. The proposal to change current zoning from an R2 to an R10 type of zoning, which has been explained to me as two homes per acre lot to 10 homes per acre lot, will drastically change the look and feel of our quiet, rural environment out here on the east end where all the neighborhoods from Nason to Redlands Blvd, both North and South of Ironwood are located. We have seen some changes since moving here in 1998 most significantly the increased unsightly warehouses which rose up south of the 60 freeway, just beyond our neighborhood, which has led to an increase in a nightly noise coming from the operation of that/those warehouse(s). We fear changed zoning of anything other than homes that resemble the current neighborhoods here, could affect the commercial zoning as well, which could lead to 24/7 type businesses which would denigrate our quality of life even more with other fears of increased activity around our homes. Only over the last two years or so have we experienced vagrants roaming thru our neighborhood, shopping carts left in the neighborhood, a day time robbery attempt, a catalytic converter theft, and now frequent mail theft. Some of us felt we existed out here as an unnoticed area of the city up until recently. Most of us felt very safe out here, but now it feels differently like our neighborhood has become more visible and has fallen victim to the crime experienced in all parts of most cities now. New development and the wrong type of development we feel, would just decrease even more of the quality of life we have enjoyed out here on the east end for so long. One of the biggest and most unacceptable proposed changes, we hear because the developer of Highland Fairview might be requesting this, is to make the street Hemlock Avenue opened up between Moreno Beach Drive and Theodore Street. Do you realize that street, Hemlock Avenue, goes right through our neighborhood, I mean homes are located on Hemlock Ave. in Sterling Ranch. How and why would someone/ the city even consider opening up a street in a neighborhood to make it a thoroughfare to benefit retail or new development affecting an already established neighborhood? We realize development will eventually happen, but it needs to be the right development with residents comments/concerns considered.

We are thankful for a couple in our neighborhood reinvigorating our neighborhood watch program in an effort to bring our neighborhood together on the basic premise of neighbors helping and watching out for neighbors, so those involved in our neighborhood watch and Facebook page are aware of these General Plan proposals. We are thankful for Council members Cabrera and Marquez taking the time to attend a neighborhood meeting on Wed., 12 May to hear our concerns and give us some guidance on how to provide our feedback and concerns. I have courtesy copied them on this email. In summary, we, my household and all the attendees at our Wednesday meeting, would like the 2006 General Plan to stay in place as to the plans for the development affecting our area. Please enter my email into the public record.

Thank you.

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- 1 Introductory comment noted.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 3 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 5 The need to make Hemlock Avenue a through street between Moreno Beach to Theodore/World Logistics Center Parkway will be driven by traffic studies and adjacent land uses as development occurs in the area. This comment does not raise an issue regarding adequacy of the EIR.
- 6 The comment will be part of the public record and will be provided to decision makers for consideration. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

Phil and Cynthia Stidham  
12324 Cloudburst Trail  
Moreno Valley, CA 92555

6  
Cont.

LETTER

RESPONSE

Letter I-45

From: Keri Then  
To: Chris Ormsby  
Cc: Robert Then  
Subject: Comment on Moreno Valley General Plan Update/Draft EIR  
Date: Monday, April 19, 2021 5:43:24 PM

Warning: External Email – Watch for Email Red Flags!

Mr Ormsby,

I request a delay in the approval of the General Plan Update (GPU) and related draft environmental impact report (EIR) until District 2 residents are provided a public meeting to voice their concerns as other Districts were offered last year and until the upcoming Special Election is certified and the newly elected D2 representative can hear the residents concerns and become informed on internal City discussions regarding the GPU/EIR. All other Districts were afforded open meetings with their elected representative. Due to the pandemic and death of our Council member, our public meeting was cancelled and never rescheduled. As such, our District has no elected representation to advocate for our residents. In addition, D2 residents impacted by any proposed changes contained within the GPU should also be directly notified of the changes and the anticipated impact to their property values, lifestyle, and services. D2 residents must be given the same opportunity to speak at a public hearing especially with respect to zoning/land use changes that add more pollution, traffic, and noise to their well established communities.

Without current elected representation for District 2, our residents are left uninformed and without a vote on City Council as to the future of land use within our District and within the City.

Regards,  
Keri Then

Dr. Keri Then, D.B.A., M.S.  
Moreno Valley, CA  
909-223-2608

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1 As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initially, the City “focused on community outreach to identify the most important issues to address within the General Plan and to establish a vision for the future of Moreno Valley. This phase included stakeholder interviews, six ‘pop-up’ outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members” (page 2-9). The City also formed the General Plan Advisory Committee (GPAC), who “served as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU” (page 2-9).

The City then conducted a second community-wide survey and multiple public meetings, which allowed City staff to explore and refine the pros and cons of six different concepts “with input from the community, GPAC, and Planning Commission. Between December 2019 and May 2020, close to 1,000 community members participated in the 2021 GPU process. In June 2020, the City Council provided input on and concurred with the Preferred Plan Concept, which is now part of the proposed 2021 GPU” (page 2-9). This comment does not suggest an inadequacy in the analysis of the Draft EIR.

2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The Draft EIR discloses all potential environmental impacts associated with the General Plan Update, Housing Element Update, and Climate Action Plan. All residents in the City will be afforded the same opportunity to attend and speak at public hearings for this project.

3 See response to comment 1 above.

Letter I-46

**From:** Tom Thornsley  
**To:** Chris Ormsby  
**Subject:** Re: Public Hearing - MoVal 2040 (General Plan Update, Climate Action Plan, and Environmental Impact Report)  
**Date:** Saturday, May 15, 2021 7:14:44 AM  
**Attachments:** imagecf:97.PNG

**Warning: External Email – Watch for Email Red Flags!**

Hi Chris,

First off, **what/how are you doing sending out this notice at 5 a.m. on a Saturday?** Please **explain why such a rush to have this to the PC in just 10 days after the close of the comment period?** There is an unprecedented amount of material to be reviewed and I heard two days ago that two of our council members have not yet begun to review these documents. I sincerely hope that all the PC members were told to review these documents well in advance of the date they will receive the agenda packet. **When did each PC member receive the NOA or were told individually that the finished documents were available for review?**

Based on the apparent push for quick PC consideration this will be going to the CC as quickly as possible. **Do you have a date for the CC meeting?** It is quite a shame that we are still not permitted to have in-person meetings where the full community can be involved in a public forum. Additionally, these documents would be going to a council that only represents 3/4 of the community. In good faith to those unrepressed member of the city, **is there any chance a final vote on the General Plan can be postponed until the District 2 council seat is filed?**

Tom Thornsley

**From:** Vera Sanchez <veras@moval.org> on behalf of Chris Ormsby <chriso@moval.org>  
**Sent:** Thursday, May 13, 2021 11:23 AM  
**Subject:** Public Hearing - MoVal 2040 (General Plan Update, Climate Action Plan, and Environmental Impact Report)

**Public Hearing - MoVal 2040 (General Plan Update, Climate Action Plan, and Environmental Impact Report)**

A Planning Commission public hearing will be held on Thursday, May 27<sup>th</sup> to review and consider MoVal 2040. The meeting begins at 7:00 p.m., and will be conducted on the Zoom

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR
- 2 This comment does not suggest an inadequacy in the analysis of the Draft EIR. A date for the City Council hearing will be published after the Planning Commission makes a recommendation.
- 3 This comment does not suggest an inadequacy in the analysis of the Draft EIR. All comments will be provided to decision makers for consideration.

LETTER

RESPONSE

platform. Please see the attached public hearing notice for additional details.

The MoVal 2040 documents are available for review on the City's website at <http://www.moval.org/cdd/documents/general-plan-documents.html>, or from a link at [www.moval.org/2040](http://www.moval.org/2040).

Thanks for your interest in the City's General Plan Update.

Chris Ormsby  
Senior Planner  
Community Development  
City of Moreno Valley  
p: 951.413.3229 | e: [chriso@moval.org](mailto:chriso@moval.org) | w: [www.moval.org](http://www.moval.org)  
14177 Frederick St., Moreno Valley, CA 92553



LETTER

RESPONSE

Letter I-47

Thomas Thornsley

29170 Stevens Avenue, Moreno Valley, CA 92555

May 17, 2021

Chris Ormsby, Senior Planner  
Community Development Department  
City of Moreno Valley  
141777 Frederick Street  
Moreno Valley, CA 92553  
chriso@rmoval.org

Sent via E-mail

Subject: Comments on the General Plan Update document collection

Dear Mr. Ormsby

These comments are being submitted MoVal 2040 General Plan, the Draft Environmental Impact Report. The focus of the General Plan documents intends to guide the future of Moreno Valley yet seems to have a focus that does not necessary represent a broad majority of the community it covers. Therefore, you will find comments that question some desired direction and the limited effort to off-set environment impact on the community to the greatest extent possible.

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A protest needs to made with regard to the manner in which the GPU is processing through the city. The members of the GP Advisory Committee were a very biased collection of individual with special interest in real estate development in the city were already members of city government with an allegiance to members of the City Council that put them there. The format for workshop meetings did not afford proper community participation nor were there any members of the general public directly involved in the process. There seems to be a rush to approve this Update without consideration to the resident of District 2 who currently have no representation on the City Council. At best a final vote on the General Plan Update should be postponed until such time that those (25%) members of the city have voice and vote.

2

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The comments that follow reflect a variety of community concerns that not only myself but may residents want addressed.

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1. The proper distance separation from warehousing to residential uses is of significant importance to lowering air pollution, noise, and aesthetic impacts. Multiple factors play into the need for greater setbacks and are not addressed as methods to lower these impacts. **Why are not defined standards to at least start to mitigate some of these affects?**

5

a. Air pollution from truck exhaust is a major air quality impact and only distances of 1,000 feet or greater should be considered. Multiple studies and agencies back this figure. **Explain why these studies have not been given consideration to establish greater setback requirements?**

6

b. Noise concerns per the zoning code have maximum decibel limits next to residential. However, there is no discussion for nuisance noises (those that fall below decibel thresholds) and these need to be addressed.. Nuisance noises from businesses permitted to operate 24/7 can produce irritating noises such as those associated with truck deliveries involving cargo doors opening and closing, backup beeping, trucks idling and external

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- 1 Introductory comment noted
- 2 Comment noted. This comment does not raise an issue regarding the adequacy of the EIR.
- 3 This comment does not suggest an inadequacy in the analysis of the Draft EIR. The City has provided opportunities for participation of all residents, including District 2 residents. As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initially, the City “focused on community outreach to identify the most important issues to address within the General Plan and to establish a vision for the future of Moreno Valley. This phase included stakeholder interviews, six ‘pop-up’ outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members” (page 2-9). The City also formed the General Plan Advisory Committee (GPAC), who “served as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU” (page 2-9).
- 4 Comment noted.
- 5 As a citywide land use plan, the General Plan provides policies to guide development but does not mandate specific setbacks for individual projects. Future warehousing projects would be subject to a site specific environmental review which would allow for consideration of appropriate setbacks based on the site conditions and surrounding land uses. These future projects would be required to follow the policy guidance in the General Plan which includes measures to support land use compatibility such as General Plan policy LCC.3-17 which states, “Screen and buffer nonresidential projects to protect adjacent residential property and other sensitive land uses when -necessary to mitigate noise, glare and other adverse effects on adjacent uses.”



LETTER

RESPONSE

	<p>6 It is unclear from the comment which studies the commenter is referring to. Air quality impacts were evaluated using SCAQMD guidance and thresholds. It is not possible to identify specific mitigation measures for future projects at a program level of analysis as site specific analysis and project details are not available at this time. However, as each future project would be reviewed during a subsequent CEQA review using SCAQMD guidelines, regional emissions thresholds, and LSTs, all feasible project specific mitigation measures, including possible setback distances, would be applied at that time.</p> <p>7 The City regulates noise through the Municipal Code under Title 11 Peace, Morals and Safety, Chapter 11.80, Noise Regulation. The Noise Regulation provides noise level limits for both continuous and impulsive sources of noise that are mentioned in the comment. In addition to these noise level limits, Section 11.80.030(D) of the Noise Regulation discusses specific prohibitions for a variety of noise sources including emergency signaling devices, power tools, pumps, air conditioners, air-handing equipment, and other continuously operating equipment. No person shall operate or permit the operation of equipment in a manner which creates a noise disturbance distinguishable from normal operating sounds. The City regulates nuisance noise through implementation of the Noise Regulation.</p>
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- building equipment operations. These become distracting background noise that can grate on a person peace and tranquility at their residence. Why is this not addressed or standards establish to reduce the impact? 7 Cont
- c. Traffic noise along roadway from expanded land uses permitting higher density/mixed use development and warehousing will have air and noise impacts on existing and future residential development. No standards or procedures we noted in the EIR, so **what standards could be provided to offset these impacts?** 8
  - d. Under Aesthetics in the EIR it notes that some warehouses are large at 600 feet. This is contrary to the development reality in Moreno Valley. Large (long & tall) buildings, some 2,000 feet long with heights permitted, by code, to 100 feet create aesthetic obstructions and substantially degrade the existing visual character of public views. Though designated "scenic vistas" do not exist in our community the degrading of the existing visual character with massive walls of warehouses are not only intrusive they lack instigated aesthetic relief. **Explain why the General Plan does not include greater standards to limit the impact through greater setbacks, significant architectural relief or variations in height limit? Is it possible to establish a setback ratio in the range of 3:1 for the height from all publically visible areas along roadways and adjacent to residential property?** 9
  - e. On page 94 of the EIR there is no mention of the views of Mt. San Jacinto to the southeast across most of the northeastern area of the city primarily east of Nasson and south to Alessandro. **Will this be included in the descriptions and note as a view that should be preserved?** 10
2. The amended Land Use Map places some higher density residential in close proximity to heavy traffic areas. Additionally, the permitting of Mixed Use could bring impacting activities in close proximity to residential uses. From the prospective of environmental justice, **explain and include criteria for land use separations so that housing is kept away from pollutant sources appropriate distances to all areas where concentrated air pollution occurs?** This should address adjacency to freeway, warehouses, and industrial uses. 11
- Air Quality & Green House Gases**
- 3. There is no doubt that air quality impacts will be of great significance to the community. **Why is there not a host of improvement measures the city could undertake to insure future development does as much as possible without systematically overriding all impacts that could be further reduced with a level of mitigation?. Provide a list of feasible mitigation that may not reduce impacts to a level of less than significant but move toward greater improvement of the impact. Please define and list these.** 12
  - 4. When it comes to GHG mitigation the ultimate results would be a net zero impact. This is admirable and it is commendable if it can be done. However, if a project would choses to pursue credits they must be sourced locally first before moving onto regional or state credit options. Credits to limit impacts outside of the community do not directly offset a project impact thus the danger will remain and add to the cumulative impacts. **Why is this form of mitigation not addressed for the betterment of the community?** 13
  - 5. There are no evaluations that define acceptable separation of residential uses and sensitive receptor from all air quality impacts source. **Explain why this is not being established as feasible method to further reduce impacts even if not to a level that it is less than significant?** 14
- Economic Evaluations**
- 6. A jobs/housing balance it important factor but the intent of achieving this should be from diverse job opportunities with businesses that have a higher per square foot ratio than most prevalent push for warehouses. **Based on the land use percentage for industrial/warehouse development,** 15

- 8 Traffic noise is addressed in Section 4.13.5.1(a) of the EIR, stationary source noise (which includes warehouses) is addressed in Section 4.13.5.1(c) of the EIR, and stationary sources of pollutants are addressed in Section 4.3.5.3(b). Noise and air quality impacts were analyzed using the City’s land use compatibility standards, the City’s Municipal Code noise level limits, and South Coast Air Quality Management District air quality guidelines and thresholds. These are the standards used to address noise and air quality impacts in the City. In regards to traffic noise, future development proposals would be required to conduct site-specific exterior and interior noise analyses to demonstrate that the proposed development would not place sensitive receptors in locations where the existing or future noise levels would exceed the land use compatibility standards. The increase in ambient noise levels was found to be significance and unmitigable. In regards to stationary noise, through enforcement of the Noise Regulation of the Municipal Code and 2021 GPU policies and actions, impacts associated with stationary sources of noise were found to be less than significant. In regards to air quality, as a part of the process for the evaluation of future development projects, air quality impacts would be evaluated using SCAQMD guidelines, regional emissions thresholds, and localized significance thresholds (LSTs). Projects that would exceed the SCAQMD significance thresholds would be required to implement project-level reduction measures to reduce potential impacts. Additional future project-level site design and emission reduction measures have been added to the air quality section of the EIR that could be implemented for future site-specific projects would reduce emissions from on-road mobile sources that generate and attract heavy-duty diesel-fueled trucks.
- 9 Refer to response to comment 5.
- 10 The EIR includes a general description of the surrounding mountains and topographic features, focusing on the immediate surroundings. The comment does not raise an issue regarding the adequacy of the EIR.
- 11 Environmental justice policies and actions are contained within Chapter 8 of the General Plan.

LETTER

RESPONSE

	<p>12 It is not possible to identify specific mitigation measures for future projects at a program level of analysis as site specific analysis and project details are not available at this time. However, as each future project would be reviewed during a subsequent CEQA review using SCAQMD guidelines, regional emissions thresholds, and LSTs, all feasible project specific mitigation measures would be applied at that time. Additionally, applicable General Plan and CAP policies would apply during subsequent environmental review.</p> <p>13 GHG impacts associated with the 2021 General Plan are addressed through implementation of the CAP. A threshold of net zero GHG emissions is neither required nor feasible at a program level. The CAP was prepared as a qualified CAP wherein emissions were calculated based on well documented and accepted guidance for emissions calculations such as CAPCOA and other sources. Emission reduction estimates based on various measures are conservative and account for the low end of emissions reductions in order to provide a conservative analysis. In order for future development to find GHG impacts would be less than significant, future projects would have to demonstrate consistency with the CAP and applicable policies. Appendix C-1 includes Potential Project Level GHG Reduction Measures. As stated in Appendix C-1, implementation of the listed measures are not essential for the City to meet its GHG reduction targets. Through implementation of the CAP, the City would achieve its GHG reduction goals and the purchase of GHG credits would not be required at the program level.</p> <p>14 This level of analysis is not feasible at the program level as site specific analysis and project details are not available at this time. As a part of future project review and documentation, project-level health risk reduction strategies for sensitive land uses in close proximity to sources of pollution will be evaluated, and if necessary, a site-specific Health Risk Assessment analysis would be conducted following SCAQMD guidance.</p> <p>15 Comment noted. This comment does not raise an issue regarding the adequacy of the EIR.</p>
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why is there not a more robust discussion and motivation for better job diversity and business development?

- 7. This section of the EIR needs to provide an evaluation of property tax revenue and the cost of services over time that shows the correlation between annual tax revenue of warehouses verse the annual cost of services to these facilities. This relates to a comparison of the property tax revenue relevant to new construction and its cost impact to community services. Over time service rates will exceed property tax incremental allowances there will come a point when taxes no longer cover services. **Where or when will this be properly explained for all developable land uses so that decision makers understand the long-term financial impacts for various types of development?**

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Land Use / Population and Housing

- 8. The "flexible land use framework" needs to be better defined to ensure that the possible range of zoning that could be permitted under a designated land use also has limits. **Explain why there is a lack of standard or limitations to balance variations in uses that bring on more intensive impacts?**
- 9. The proposed higher density residential at Moreno Beach and Ironwood is a four-fold increase in density and would mandate that sewer service be introduced where it currently does not exist. This then becomes a growth inducing impact to all the norther properties and limits the preservation of a rural land use for residential development and community character. **Explain how interweaving of land uses would not be considered an impact that divides a community?**
- 10. If Mix Use development in permitted, **what is to preclude further warehouse development that would divide residential development?** Dropping warehouse or other industrial uses in the middle of residential areas diminishes a sense of community.
- 11. Since the City's animal keeping overlay is not a part of the General Plan, **explain how it would be maintained over properties and undeveloped land uses currently permitted this use?** The removal of land uses that permit this opportunity diminishes housing diversity and the ease with which property owner can maintain horses and use the trail network developed to accommodate them in on the eastern edge of the community.
- 12. The District Specific Plan area was expanded in 2018 and the maps throughout all the GPU documents need to be **adjusted to reflect that change.**
- 13. The term "mixed uses" in these documents describes uses that differ from the extensive range of mixed uses permitted in the Zoning Code. **What is a proper definition that identifies the full range of uses desired by the general plan's use of the term and how this will be addressed as it relates to the same term in the zoning code?**
- 14. **Provide information about whether Aqua Bella Specific Plan is still active or has its entitlements expired? If Aqua Bella is now an expired project, explain why it is so widely referenced in these documents?**
- 15. **Why isn't the city initiating a Downtown Center plan? How can the city assure that the desired results will occur given the large number of individually owned properties?**
- 16. **Under Policy LCC.2-2 explain what qualifies as a small parcel permitted to develop with only a site plan?** Permitting the development of these small lots will complicate the intent of the Town Center's unified development.

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Circulation

- 17. Many traffic related mitigation measures for recent project approvals require the involvement of regional transportation agencies that decide when and what improvements should be made. Until improvements can be made the circulation level of streets could fall below acceptable standards

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16 Economics is not an issue required to be evaluated in an EIR. This comment does not raise an issue regarding the adequacy of the EIR.

17 Comment noted. This comment does not raise an issue regarding the adequacy of the EIR.

18 Regarding extension of sewer service, while areas north of State Route 60 planned for Highway/Commercial are not currently served by sewer, these areas are within the Eastern Municipal Water District service boundaries and service can be provided by connecting to nearby facilities. Section 5.3.2 of the FEIR was revised to clarify the required extension of services. Extension of services to this area would not remove major barriers to growth as facilities are nearby. Additionally, the existing plan has designations north of State Route 60 that would also require the extension of sewer; therefore, the plan does not introduce land uses requiring sewer that do not already exist in the area.

The higher density residential at Moreno Beach and Ironwood would not divide a community as the higher density is proposed adjacent to highway office/commercial and near existing major roadway infrastructure. The placement of density in this location would serve as a transition between the Highway Office/Commercial and the surrounding lower density residential.

19 Warehouses would not be consistent with the Highway Office/Commercial designation. As detailed in the General Plan, the HIGHWAY OFFICE/COMMERCIAL (HO/C) designation "provides for a distinctive employment or educational campus at the eastern gateway to the city. Primary permitted uses include office, educational, and/or research and development facilities organized in a clustered development pattern with intervening areas of landscaped open space. Auxiliary commercial uses, including restaurant, retail, and service uses are also permitted. The architectural style of development should reinforce the rural character intended for the surrounding area. The maximum permitted FAR in the HO/C designation is 0.4. On smaller parcels, additional FAR may be permitted to achieve the desired vision for the area."

LETTER

RESPONSE

	<p>20 Changes to the animal keeping overlay are not proposed with this action but would be introduced as part of the separate zoning action to bring zoning consistent with the ultimate land use plan adopted. This comment does not raise an issue regarding the adequacy of the EIR.</p> <p>21 Comment noted. This comment does not raise an issue regarding the adequacy of the EIR.</p> <p>22 The comment appears to be referring to the level of service transportation methodology which is no longer applicable to CEQA documents. Vehicle miles traveled is the current methodology used to evaluate transportation impacts. This methodology does not measure the congestion on City streets, rather calculates the length of trips that a project would make based on land uses. The comment also raises concern about no specific improvements being identified in the EIR and no time frames provided for improvements. As a planning document, no development is proposed with the General Plan. All future development projects would be required to undergo a site specific environmental review that would include evaluation of necessary transportation improvements and analysis of potential transportation impacts based on a VMT methodology.</p>
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as development occurs. Fee-based mitigation is inadequate where the improvements are tied to funds which are uncertain to occur. There is no timeline for the improvements or any showing that improvements will be made within a reasonable time-frame. In addition, there is no indication as to how much funding has already been collected, if any. The TUMF and DIF programs do not appear to be disclosed in the record. The fact that traffic impacts have been determined to be "significant" does not insulate the City from adopting certain and enforceable mitigation.

**What mitigation could be considered even if they seem as a hindrance to development?** Mitigation measures under outside control are not enforceable so they should include timelines and milestones for limiting development until improvements are made in the name of safety and general welfare. **Please address and include mitigation to that limits development or offers leverage to assure impacts will be mitigate before problem arise.**

- 18. Although it is stated that truck traffic should avoid passing by locations with Sensitive Receptors (eg: schools) it is occurring within the city anyway. **How will the city stop all impacts associated with regular truck traffic passing by locations with sensitive receptors to assure limiting air impacts and insuring safety?**
- 19. The World Logistics Center and any future high traffic generating uses north of SR-60 will severely impact traffic flow at the freeway interchanges for Redlands Blvd., Moreno Beach, and Theodore Avenue. **What will the city be doing to limit traffic congestion or pay for these upgrades? How can the city influence CalTrans to improve SR-60 when they have made it clear they have no plans to widen this highway?**
- 20. Since traffic impacts at freeway interchanges will be impacted with future development why hasn't this EIR or the City address the timing and/or milestones that will limit development until the necessary improvements can be cleared and built with the approval of Caltrans and the RCTC?
- 21. **How will the city make circulation improvement in those area of the city that will not have potential for development that would otherwise pay or install the improvements?** A good example is the segment of Moreno Beach Drive north of Cottonwood Avenue leading to the auto mall.

Energy

- 22. How will the City best meet state requirements for renewable energy? Why won't the city permit the maximum solar installation on all building rooftops? Using building rooftops and parking lot square footage to max capacity could provide a tremendous offset and provide mitigation for air quality impacts. With the discussions in these document regarding the need for the reduction of greenhouse gases the city will still be increasing their output as development occurs. Why is Moreno Valley not being progressive and striving for the community to move towards a net zero GHG emissions? Why has the EIR not establish a host of mitigations that could be implemented to work towards lowering this impact?

Housing

- 23. Discussions of jobs/housing balance indicates that this would cut down on commutes and offset other environmental impacts. However, nothing appears to be included in all the documents that provides the range of job mixes necessary to assure commutes are reduced. Being job heavy in one industry limits diversity for jobs held by the city residents, thus no chance in their commutes can be achieved. **Provide the jobs data analysis that justifies the broad range of job opportunities that achieves the goals for reduced travel times, reductions in air quality impacts, and traffic congestions.**

General Plan Update Preparation

23 The General Plan includes policy EJ.1-9, to "Designate truck routes that avoid sensitive land uses, where feasible." Truck routes are regulated by the Municipal Code. As detailed in the Draft General Plan Circulation Element, "Truck traffic on City streets is restricted to specific routes that are designated for thru traffic of trucks over three tons; the truck network system is identified in the City's Municipal Code. These truck routes help to facilitate the movement of goods throughout the city, while providing a connection between major highway facilities (i.e., SR-60 and I-215) to local roadways, such as Alessandro Boulevard and Heacock Street. Moreover, truck traffic is restricted to these designated roadways, unless otherwise authorized by the California Vehicle Code, in order to minimize wear and tear on City streets and promote safety on residential streets." Refer to Section 4.3 of the Draft EIR for impacts related to air quality.

24 The need for improvements at interchanges including Caltrans improvements would be identified as future development is proposed. Where appropriate, individual development projects would be required to implement necessary improvements. This comment does not raise an issue regarding the adequacy of the EIR.

25 The CAP includes numerous measures and actions that would be implemented to reduce GHG emissions, including policies that encourage rooftop solar. This comment does not raise an issue regarding the adequacy of the EIR.

26 Assumptions for VMT are based on information from SCAG and modified to take into account local factors. Details of the VMT technical analysis are provided as EIR Appendix E. Air quality assumptions are based on VMT generation and standard model assumptions, detailed in Appendix B of the EIR. Traffic congestion is not an issue that requires evaluation in CEQA documents.

- 24. How many workshops were held to discuss the GPU with the public?
- 25. How many times did the General Plan Advisory Committee meet outside of the video conference workshop meeting?
- 26. Who prepared the list of Goals, Policies, and Actions designed to implement the General Plan?

27

EIR Comments

Transportation

4.16.5 Impact Analysis

28

a. Circulation Network

- 27. This section includes a number of roadway improvement projects that are primarily within the boundaries of the World Logistics Center or element directly impacted by and necessitating improvement. The TUMF has been artificially reduced for "high cube" warehouses and as such the WLC will not be contributing sufficient funding to address the necessary improvements. Please explain the financing mechanisms the city will enact to pay for these improvements? Will the WLC be responsible for full cost of the five project within its boundaries listed on page 4.16.17?
- 28. There is no indication in this document as to when the traffic circulation improvements will be implemented. Fee-based mitigation is inadequate where the timing of the improvements are tied to funds which are uncertain to occur when significant impact occur. How will timelines for the improvements be made within a reasonable time-frame?
- 29. Policy C.3-2 allows some impacted roadways to be exempt from meeting the LOS policy based on constraints. Please provide a list of those areas expected or likely to be exempt since this policy is included and expects it to occur. Map these locations in the General Plan so that development alternatives can be considered too lessen impacts at these known impacted locations
- 30. Policy C.3-8 suggests that new development should pay a fair share of transportation improvement costs; however the city's fee schedule for large warehouses imposes fees far below the regional averages as shown in the latest adoption of the city's fee schedule.
  - a. Define where the city expects to secure the funding necessary to cover the costs associated with extra vehicle trips from employees, truck, and delivery vehicles upon our roadways.
  - b. What funding source is the city guaranteed to have to maintain its roadways? It has already committed 35% of the Measure A revenues to repayment of one road improvement bond.
  - c. How will the city calculate a project "fair share" of the impacts to transportation elements costs?
  - d. If impact fees are insufficient, how will the city get reimbursement from a development project?
- 31. State Regulations listed in 4.16.2.1 would appear to require that circulation patterns should be safe for all users. Based on some proposed land use changes to vacant lands adjacent to existing development, how will the city address conflicts between existing uses and future use of other types whose traffic patterns would conflict with exiting roadways?
- 32. FIGURE 4.15-3 Park Service Areas does not show the correct alignment of the proposed trails through the area of the WLC. See Map PPS-2 in the General Plan. Correct the trail errors in FIGURE 4.15-3 Park Service Areas

29

30

31

- 27 Please check the City's website for information on public meetings that were held (MV CDD: Participate in the 2040 General Plan Update (moval.org). There were a total of six General Plan Advisory Committee meetings which were all public meetings. This comment does not raise an issue regarding the adequacy of the EIR.
- 28 This comment does not raise an issue regarding the adequacy of the EIR. The transportation analysis evaluates build out of the land use plan based on a VMT methodology. Roadways discussed in Section 4.16 of the EIR and depicted on Figure 4.16-1 reflect the planned roadways in the General Plan Circulation Element. These roadways are not planned to be constructed as part of the proposed project and thus the analysis is programmatic. Future development projects would be evaluated individually to determine their respective VMT impact and required mitigation. Additionally, where future development necessitates roadway improvements, those would be required to be constructed as conditions of approval of individual development projects.
- 29 This comment raises a number of questions and concerns but do not raise an issue regarding the adequacy of the EIR. LOS does not pertain to impacts of the project under CEQA. Refer to response 22.
- 30 Future site-specific environmental review would occur for future development that would consider compatibility with adjacent uses including applicability of General Plan policies from the Land Use and Community Character Element. This comment does not raise an issue regarding the adequacy of the EIR.
- 31 Comment noted. This comment does not raise an issue regarding the adequacy of the EIR.

LETTER

RESPONSE

<p>33. FIGURE 4.16-1 Existing and Planned Bicycle and Pedestrian Network fails to include the existing Multi-Use Paths already constructed within the city. It also fails to show all the proposed trails seen on the city's current trails system map. Additionally, this figure fails to show the proposed trail network within specific plan areas that are elements of those projects. See Map C-2 in the General Plan. <b>Provide an updated map (FIGURE 4.16-1) that includes all the missing Multi-Use Paths - existing and proposed.</b></p>	32
<p>34. Page 95, paragraph 3 describes narrow unpaved roads as though this is the norm. <b>Please explain this conclusion or correct the text accordingly.</b></p>	33
<p>35. Page 95 and elsewhere in the document there are references to the Anza Multi-Use Trail which does not currently exist. <b>Explains its inclusion and the proper stage of development proposes for this trail.</b></p>	34
<p>36. The last paragraph on page 95 describes buildings from 600-900 feet. This needs modification because the 1-1.5 million sq. ft. buildings fare exceed this range. Skechers is in excess of 2,000 feet long. Additionally, <b>commercial and warehouse development along SR-60 e/o Nasson contribute to the light and glare. How will these be corrected or addressed in the document?</b></p>	35
<p>Page 96:</p>	
<p>37. <b>Why are Historic Resources noted in this section?</b> It belongs in Cultural. Explain? Why are FAA concerns listed here rather than in Land Use/Planning? This is not an aesthetic issue.</p>	36
<p>On page 98:</p>	
<p>38. There is extensive reference to CRGP and its relationship to Moreno Valley is not clear. <b>Who's land use element are you referring too?</b> All the text relates to county criteria and not reinvent to MV.</p>	37
<p>39. <b>Did the city actually adopt "Dark Skies" standards?</b> It appears that they voted not to adopt those standards in the past.</p>	38
<p>40. <b>Did the city actually adopt "Dark Skies" standards?</b> It appears that they voted not to adopt those standards in the past. If this is incorrect, <b>to what extend did these standards get adopted and will it effectively limit night glow and maintain light levels compatible to observatories?</b></p>	38
<p>41. The city's Performance Standards or minimal at best and very subjective. <b>How will these standards be enhanced to achieve what is implied?</b></p>	39
<p>Page 100</p>	
<p>43. OSR.2.1 Hillside development is described here but previously it was only addressed as a Riverside County concern. <b>What fix is proposed to get the correct aspect of the intended limits to hillside development?</b></p>	39
<p>44. OSR.2.5 <b>Why does this not include Redlands Blvd, Theodor Ave, SR-60 and Ironwood?</b></p>	
<p>45. OSR.2.8 <b>This is why 4.1.1.1.c. should be in listed under cultural resources.</b></p>	
<p>Page 102 (last Paragraph):</p>	
<p>46. Did not think the medical center were part of the development area because they are existing. <b>Explain how they influence the Downtown Center concept?</b></p>	40
<p>47. <b>How will the city coordinate the development of an Area Plan with so many different property ownerships? Who will develop the "high-quality architectural standards"?</b></p>	40
<p>48. Page 103 concludes that visual impacts would be less than significant. The statement, "would not degrade" will only occur if the city develops the required code changes and establishes development standards. <b>What is the guarantee that this will occur?</b></p>	41

32	<p>Comment noted. The depicted trails are generalized trail locations and not meant to reflect every planned trail as refinements would occur as trails are developed.</p>
33	<p>The referenced paragraph accurately describes existing conditions in a specific area of the City. No corrections are needed.</p>
34	<p>Comment noted. The depicted trails are generalized trail locations and not meant to reflect every planned trail as refinements would occur as trails are developed. This comment does not raise an issue regarding the adequacy of the EIR.</p>
35	<p>Typical warehouses in the 600 to 900 feet range is typical, although longer buildings are located in the City. Regarding light and glare, the purpose of the EIR is to evaluate potential impacts associated with build out of the land use plan, not existing conditions.</p>
36	<p>The historic resources listed in Section 4.1 of the EIR are included due to their visual significance in the community. These resources are also discussed in the cultural resources section of the EIR.</p>
37	<p>The County of Riverside General Plan is referenced in order to provide context to the land use plans that currently govern areas outside of the City's boundaries, within the City's sphere of influence. This is provided only as background information.</p>
38	<p>The EIR identifies applicable lighting regulations in the Municipal Code as follows:</p> <ol style="list-style-type: none"> <li>a. Chapter 9.08 General Development Standards, Section 9.08.100 Lighting establishes regulations and standards for outdoor lighting which will reduce light pollution and trespass generated by residential and nonresidential lighting fixtures and devices, while maintaining dark skies.</li> <li>b. Chapter 9.10 Performance Standards provides standards for proposed development projects that may impact the surrounding neighborhood.</li> </ol>



LETTER

RESPONSE

	<p>38 cont.</p> <p>c. Municipal Code Section 9.0.110 regulates light and glare by providing that no sign or lighting fixture shall create illumination which exceeds 0.5 foot candles minimum maintained on any adjacent property, whether the illumination is direct or indirect light from the source. Additionally, it is required that all lighting be designed to project downward and not create glare on adjacent properties.</p> <p>It is unclear what other dark skies standards the commenter is referring to. The comment does not raise a comment regarding the adequacy of the EIR analysis.</p> <p>39 These comments relate to proposed General Plan policies referenced in the EIR but do not raise an issue regarding the adequacy of the EIR. OSRC.2-8 is also referenced in the Cultural Resources section of the EIR.</p> <p>40 The Downtown Center will require development of a Specific Plan or area plan to guide development. This plan will require architectural standards that will ultimately need to be approved by the City. This comment does not raise an issue regarding adequacy of the EIR.</p> <p>41 Compliance with applicable policies in the General Plan would be required of future development through a discretionary review process for future development.</p>
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LETTER

RESPONSE

Page 104	<p>49. <b>Why is industrial left out of this description for light sources?</b> Warehousing includes extensive lighting thus light pollution and night glow.</p> <p>50. <b>What is BUG ratings?</b> Define this here in the text.</p> <p>51. <b>How will the city address excessive lighting from 24/7 warehouse operations?</b></p> <p>52. <b>Verify the foot-candle standard.</b> Isn't the code standard 0.5 foot-candle at property line?</p> <p>53. Page 105: To achieve "Dark Skies" standards there must be a mitigation measure that set light wavelength at 2,700 Kelvin's. <b>Will this be included and if not why?</b></p>	<p>42</p> <p>43</p> <p>44</p> <p>45</p> <p>46</p>	<p>42 While not stated explicitly, the EIR text is inclusive of industrial uses as a source of light generation. The DEIR states, "The sources of new and increased nighttime lighting and illumination include, but are not limited to, new residential development, lighting from non-residential uses, lights associated with vehicular travel (i.e., car headlights), street lighting, parking lot lights, and security related lighting for nonresidential uses."</p>
Page 324	<p>54. Land Use/Planning and throughout the entire EIR: Please adjust area references to better describe the land in the city with secondary references to the project area because the numbers make assessment confusing and could be considered misleading. <b>What was the purpose of making the Project Area such a primary accounting of the land uses?</b></p> <p>55. <b>Why does our GP not state the actual square miles of the city?</b> Most of the land in the spear of influence is open space or not developable thus we should focus the developable land.</p> <p>56. Noting multi-family by land percentage provides a misleading assessment. <b>Why are you not providing a similar accounting for the housing stock in each category? Provide the housing unit count in this document for textual understanding of area verses unit provided.</b></p>	<p>47</p> <p>48</p>	<p>43 BUG stands for backlight, up light and glare. Section 4.1.2.2 defines BUG. It states, "Title 24 of the California Building Standards Code serves as the basis for the design and construction of buildings in California. In addition to safety, sustainability, new technology and reliability, the California Building Standards Code addresses light pollution and glare hazards through the establishment of maximum allowable backlight, up light, and glare (BUG) ratings."</p>
Page 326	<p>57. <b>You need to provide a definitive location for the Moreno Valley Industrial Area.</b> How are readers and resident are supposed to know where this is?</p> <p>58. <b>Why haven't you provided a park and rec breakdowns for improved verses greenways and open space and conserved lands?</b></p> <p>59. <b>What are the breakdowns between greenway (what are these?), open space, conserved lands, and developed parks?</b> This is critical to understand the actual recreational areas to patronize.</p> <p>60. <b>Address why parks are not evenly dispersed in the entire eastern quarter of the city?</b> Hound park and equestrian are the only facilities in the eastern ¼ of the city.</p> <p>61. Verify whether the Aquabella project still has its entitlement. Seem to recall that it expired thus no longer valid to include in this assessment. <b>What did you find out about the status of Aquabella?</b></p> <p>62. Page 327: The Brodiaea Commerce Center is a completed project. <b>Why is it included as an upcoming project?</b></p> <p>63. Page 328: <b>Why is the Juan Bautista De Anza Multi-Use Trail include when it has not been installed?</b></p> <p>64. Why doesn't FIGURE 4.11-2 include the proposed areas of land use like WLC? <b>Should this figure be retitled as Distribution of Existing...?</b></p> <p>65. Page 340 makes mention under MoVal Town Center to the city property as a potential development area. This is outdated since it was presented and a development agreement approved with Lewis Properties. <b>Update accordingly.</b></p> <p>66. <b>How can the 4.11.5 Impact Analysis be conducted when all the preceding text described the built environment without any mention of how the land use changes could impact the community?</b></p> <p>67. LCC.1.5: <b>How can the residents be assured that mixed use development will not put warehouses in the mix and conflict with surrounding uses?</b></p> <p>68. LCC.1-A contains many opportunities for elected official to enter into sweetheart deals. The city's impact fees are well below regional averages thus not likely to offset the costs of infrastructure it desires. <b>How can the citizens be assured that the city will be financially responsible?</b></p>	<p>49</p> <p>50</p> <p>51</p> <p>52</p> <p>53</p> <p>54</p> <p>55</p> <p>56</p> <p>57</p>	<p>44 This comment does not raise a specific issue regarding adequacy of the EIR. Lighting impacts are addressed in section 4.1.5.4 of the EIR.</p> <p>45 The 0.5 foot candle standard is a general requirement to be maintained at property lines specified in Section 9.10.110 of the Municipal Code. Municipal Code Section 9.08.100 provides more specific lighting regulations for various land use types. The 0.25 foot-candle standard applies to non-residential development (see Municipal Code Section 9.08.100 C.3.a).</p> <p>46 The comment suggests a mitigation measure but does not provide any reasoning or explanation as to why this measure is needed or what it would achieve.</p> <p>47 The project area includes all land with in the City limits in addition to land within the sphere of influence. Including the sphere of influence in comprehensive land use planning is appropriate.</p> <p>48 The section of the EIR referenced by the commenter is a discussion of the existing conditions in the land use section. It is meant to provide a general overview of Citywide land uses. The comment does not raise an issue regarding adequacy of the EIR.</p>

LETTER

RESPONSE

	<p>49 The EIR project description Figure 3-1 identifies the areas where the General Plan land uses would change under the project. Warehousing would be allowed within Business Park/Light Industrial and Business Flex. Figure 3-2 additionally shows the entire land use plan which shows all corresponding areas where warehousing would be allowed (Business Park/Light Industrial and Business Flex).</p> <p>50 EIR Figure 3-2 shows generalized areas of open space including public lands and parks/open space.</p> <p>51 The comment does not raise an issue regarding the adequacy of the EIR.</p> <p>52 This comment does not raise an issue regarding the adequacy of the EIR. The depicted trails are generalized trail locations and not meant to reflect every planned trail as refinements would occur as trails are developed.</p> <p>53 Figure 4.11-2 shows existing retail centers and business parks. Since WLC is not existing, it is not shown. The comment does not raise an issue regarding the adequacy of the EIR.</p> <p>54 As the town center in this location is not constructed, it remains a potential town center. Updating the text to reflect a development agreement is not necessary and does not affect the EIR analysis. The comment does not raise an issue regarding the adequacy of the EIR.</p> <p>55 The preceding text mentioned by the commenter is intended to describe existing conditions which sets the appropriate baseline for analysis under CEQA. The purpose of the impact analysis section is then to discuss how the land use changes may impact the environmental when compared to existing conditions.</p> <p>56 The General Plan defines allowable land uses for each land use designation. Mixed-use is not intended for warehouses. The comment does not raise an issue regarding the adequacy of the EIR.</p> <p>57 The comment questions proposed General Plan policies but does not raise an issue regarding the adequacy of the EIR.</p>
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LETTER

RESPONSE

69. LCC.1-9: This policy expects that city boundaries will be logical when included areas of the eastern spear of influence are so remote and removed from the principles of the policy. **How can this be afforded by the city?**

57 cont

**Environmentally Superior Alternative S.5.4**

70. This alternative has all the making to be the best option for the community. The comment at the end of the first paragraph under S.5.4 indicated that this is the superior alternative the states "however, the project itself may not be identified and the environmentally superior alternative. **Explain the contradictory descriptions?**

58

71. The second paragraph identifies all the topic areas that benefit with this alternative but not to below the level of significance. **Explain how this is a worst option to the Project?**

59

72. Furthermore, there is reference that the Town Center is not "housing ready." **Define this term and how any other properties and "more housing ready"?**

60

73. **Explain who has set the RHNA targets and what timeline difference either option would have on housing construction? Do the targets take into consideration economic setbacks that could forestall any attempt to meet a timetable?**

61

In conclusion from reviewing only those section which time allowed it appears that with the "Project" as proposed, the best community option with the smaller alteration of city with land uses would be, and should be the Superior Alternative.

62

Should you have any questions feel free to contact me and keep me informed of the progress of the MoVal 2040 General Plan Update.

63

Sincerely,

Thomas Thornsley

58 The statement "however, the project itself may not be identified and the environmentally superior alternative" is referring to the MoVal 2040 Project than was fully evaluated in the Draft EIR. This statement is not referring to the Redistributed Growth Alternative. CEQA requires that one of the alternatives be selected as the environmentally preferred alternative, not the project.

59 Refer to Chapter 6.0 of the EIR for a more thorough analysis of each alternative and discusses how impacts compare to the project and whether it meets project objectives. The purpose of the alternative analysis is not to identify a best or worst option, it is to provide alternatives that could reduce potentially significant impacts.

60 The EIR text in Sections and S.5.4, 6.5.4 and 6.6 has been revised to clarify the statement about Downtown not being housing ready. The text has been revised to clarify that development within the Downtown Center would take more time and investment to accommodate housing units needed to achieve the City's Regional Housing Needs Allocation (RHNA) targets compared to what could be achieved along the Community Corridors proposed under the project.

61 The City's RHNA allocations are established by the State and municipal planning organizations (e.g. SCAG). This comment does not suggest and inadequacy in the analysis of the Draft EIR.

62 All comments will be provided to the decision makers for consideration. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

63 Concluding comment noted.

LETTER

RESPONSE

Letter I-48

From: [CMT Torres](#)  
To: [Chris Ormsby](#)  
Subject: MoVal 2040 comments for the record  
Date: Sunday, May 16, 2021 6:53:03 AM

**Warning: External Email – Watch for Email Red Flags!**

Hello Mr. Ormsby,

I am writing in opposition to changing to high density zoning in the northeast of Moreno Valley. I have been a resident since 1988. I moved here for the rural character and wide open spaces which were slowly and now, unfortunately, quickly disappearing. There are many others in this part of town who want to keep the rural, or semi-rural character. Large properties are at a premium and many people prefer them, wanting to have small backyard farms to grow their own food and to keep small farm animals such as chickens. Especially in light of the pandemic we have been living through, and now increased pricing on groceries, more people want to turn to this. If you take this away from this northeast part of town you take away this desirability of these prospects. You are not turning MoVal into a "destination city" by just becoming a high density town and over-commercialized but will be achieving the opposite.

Thank you for your time. Please remove my address from public view. Thanks.

Christina Torres

1  
2  
3  
4

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 3 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 4 The commenter’s address has been omitted from the comment.

Letter I-49

From: [ivette.torres](#)  
To: [Chris.Ormsby](#)  
Subject: Extension of Public Comments for draft General Plan, CAP, DEIR from 45-day to 60-day  
Date: Monday, May 17, 2021 5:05:49 PM

**Warning: External Email – Watch for Email Red Flags!**

Hello Mr. Chris Ormsby,

My name is Ivette Torres, and I am a community member of Moreno Valley, and I am emailing you to urge you and the General Plan Committee to extend public comment from the 45-days to the 60 days on these crucial important documents.

I am not only a Moreno Valley resident, but a previously engaged community member of the General plan process and did not even receive a notice or find out Public Comment was due until today; this speaks to how the community engagement piece for public comment was handled. There was not enough engagement or enough time for the community to read through and comment on three crucial pieces of policy and documentation for the future of the city. The overall process has been moving extremely quick and has lacked consistent engagement. Given that and the fact that we are still in COVID-19 and the whole update has been through COVID-19, it means engagement has been difficult for the community and does not represent the entirety of the Moreno Valley Community. Therefore I urge you and the committee to extend the deadline for public comment for 60 days and increase engagement in the next month to get the community to comment on the draft Climate Action Plan, draft Environmental Impact Report, and draft General Plan. I will be reaching out to local community organizations and the AG's office to see what can be done for extension of the deadline.

Thank you for your time and help.

Best,  
Ivette Torres

--  
[ivette.torres](#)  
Assistant Specialist CE-CERT  
<https://www.iveylab.com/>  
University of California, Riverside



1 The Draft EIR was circulated for a 45-day public review period consistent with the requirements of CEQA Guidelines section §21091(a). The 45-day public review period began April 2, 2021 and ended May 17, 2021. An extension of the review period is not warranted.

As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initial outreach included stakeholder interviews, six ‘pop-up’ outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members (Draft EIR page 2-9). The City formed the General Plan Advisory Committee (GPAC), as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU. Additional community-wide surveys and multiple public meetings were held between December 2019 and May 2020, with close to 1,000 community members participating in the 2021 GPU process. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

Letter I-50

**From:** [Vince](#)  
**To:** [Chris Ormsby](#)  
**Subject:** You must live up to our 2006 land use plan. The idea of changing all of our city to build more commercial buildings is not the way to go.  
**Date:** Monday, April 19, 2021 9:57:45 AM

Warning: External Email – Watch for Email Red Flags!

Sent from my iPhone

1      Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

Letter I-51

From: D Wilson  
To: Chris Ormsby  
Date: Monday, May 17, 2021 2:42:15 PM

Warning: External Email – Watch for Email Red Flags!

I'm reaching out to ask for your help in defeating the proposed general plan that changes the NE area of Moreno Valley. The EIR claims that there will be no significant negative impacts if commercial and higher density housing is allowed which is blatantly false.

1

I hope that you might be able to take a few minutes (or more) out of your busy schedules to and oppose the changes to NE Moreno Valley and adopt CEQA's environmentally superior alternative that includes no changes to our area.

2

thank you

--  
Pastor Wilson  
Lighthouse Baptist Church  
12140 Indian St. Moreno Valley Ca, 92557  
951-924-5094/

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The General Plan Update includes increased residential density in order to accommodate the City's RHNA allocation in accordance with State Housing laws.
- 2 All comments will be provided to the decision makers for consideration. This comment does not suggest an inadequacy in the analysis of the Draft EIR.



Letter I-52

From: D. Wilson  
To: Chris Ormsby  
Subject: General plan updates  
Date: Monday, May 17, 2021 2:57:47 PM

Warning: External Email – Watch for Email Red Flags!

Dear council, staff, and planning commission,

I am writing to voice my opposition to the proposed general plan update and draft EIR and ask that this document be entered into the public record. I live in the area and purposely chose this part of my beloved city to live in for the size and space of the Lots.

How many lots this size are for sale in Moreno valley? Are we giving the citizens a choice to buy this size lot, in comparison to the standard lot size? Also impacts to my neighborhood would be extreme. This in turn will damage my family of 6, their quality of life, and safety. Can you provide for me criminal impact studies for the proposed General plan?

It is important to maintain our community character and we add diversity of housing for your community.

Within the draft EIR, CEQA identified two alternatives that protect the NE end of Moreno Valley, 6.4 Reduced Growth Alternative and 6.5 Redistributed Growth Alternative which has been identified as 6.6 Environmentally Superior Alternative. Both of these alternatives retain our 2006 general plan land uses in the NE and are the appropriate actions."

--  
Pastor Wilson  
Lighthouse Baptist Church  
12140 Indian St. Moreno Valley Ca, 92557  
951-924-5094/



- 1 Introductory comment noted. The comment raises general concern about impacts to the commenters neighborhood but does not raise a specific issue regarding the content or adequacy of the EIR.
- 2 Comment noted. This comment does not raise an issue regarding the adequacy of the EIR.
- 3 Comment noted. This comment does not raise an issue regarding the adequacy of the EIR.
- 4 Comment noted. This comment does not raise an issue regarding the adequacy of the EIR.

Letter I-53

**From:** [Ken Wun](#)  
**To:** [Chris Ormeby](#)  
**Subject:** Parcel number: 478-240-016  
**Date:** Thursday, April 22, 2021 12:45:07 PM

**Warning: External Email – Watch for Email Red Flags!**

Hi Chris:

Hope you are well. We chatted a bit a year ago about parcel number: 478-240-016. Could you please help me interpret what the draft general plan (April 2021, map on p. 31) has in stored for this parcel? I can't quite tell because the small size of our parcel. For your reference, current zoning: The SE triangular half is zoned "HR". The NW triangular half is zoned R5. Thanks so much.

Ken

**Kenneth Wun**

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[www.tdainc.com](http://www.tdainc.com) | [ken@tdainc.com](mailto:ken@tdainc.com)

1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The land use and zoning designations for this parcel were not changed under the General Plan Update.

Letter I-54

**From:** Susan Zeitz  
**To:** Chris Ormsby; David Martinez; Ulises Cabrera; Dr. Yeshan A. Gutierrez; Victoria Bana; ddowney@scmg.com; whitestravel@stanison.net  
**Subject:** request a minimum 30 day extension to Moreno Valley's citizens to review document for the proposed General Plan Updates  
**Date:** Tuesday, April 20, 2021 3:55:17 PM

**Warning: External Email – Watch for Email Red Flags!**

Dear Council members and Mr. Ormsby,

Please extend a minimum 30 day extension to Moreno Valley's citizens. I want more time to do my due diligence to insure I fully understand all of the proposed changes Iddo Benzeevi and his associates on the General Plan Update committee want to make. I need time to make sure updates are going to be universally beneficial to everyone, not just a few. I also need more time to study and be sure the proposed changes won't negatively impact our lives, health, property values, or our infrastructure. It also takes time to get responses to questions that arise.

Managing Biodiversity, urbanization, and it's citizens is challenging. The 1984 incorporation of Sunnymead to Moreno Valley's had it's citizens working closely with their city representatives, to create and maintain a General Plan, and it's updates, successfully protecting our citizens from potential, and possibly numerous future adverse impacts to the biodiversity of our natural environment and it's citizens. This farsightedness prevented fragmentation and complete alteration of our ecological areas, protecting both our natural environment and those who live here.

As a concerned citizen of Moreno Valley I feel overwhelmed by the limited time I've been given to read, study, research, and assimilate the drafts of the EIR, Climate Action Plan, and documents concerning the General Plan Update and the changes being proposed as they differ greatly from our current General Plan.

Efforts for citizen involvement, as our City's Mission Statement states it supports, has been limited and difficult to keep up with for more than a year. Many requests were sent asking the General Plan Update to be postponed as there is absolutely no need to rush such an important issue so there is no reason not to give Moreno Valley's citizens a minimum 30 day extension.

Thank you,  
 Susan Zeitz

1  
2  
3  
4

- 1 The Draft EIR was circulated for a 45-day public review period consistent with the requirements of CEQA Guidelines section §21091(a). The 45-day public review period began April 2, 2021 and ended May 17, 2021. An extension of the review period is not warranted.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The Draft EIR discloses all potential environmental impacts associated with the General Plan Update, Housing Element Update, and Climate Action Plan.
- 3 This comment does not raise a specific issue regarding the adequacy of the Draft EIR. Impacts related to biological resources is addressed in Section 3.4 of the Draft EIR. As detailed therein, key habitat and wildlife corridors identified for protection under the MSHCP would be maintained under the General Plan Update and impacts related to wildlife corridors were found to be less than significant.
- 4 See response to comment 1 above.

LETTER

RESPONSE

Letter I-55

**From:** [Susan Zeitz](#)  
**To:** [Chris Ormsby](#)  
**Subject:** GPU comments questions  
**Date:** Monday, May 17, 2021 5:30:35 PM

**Warning: External Email – Watch for Email Red Flags!**

GP Pg 17 GPAC was formed as an advisory role so why are there not meeting minutes available?

Susan Zeitz

1

- 1 All public outreach events, materials and video recordings of meetings are available to the public on the City's website for the General Plan Update <http://www.moval.org/cdd/documents/general-plan-home.html>. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

Letter I-56

From: Susan Zeitz  
To: Chris Ormsby  
Subject: GPU comments  
Date: Monday, May 17, 2021 4:33:25 PM

Warning: External Email – Watch for Email Red Flags!

May 17, 2021 Susan Zeitz in Opposition of the General Plan Update

Dear council, staff, planning commission and residents,

I, Susan Zeitz, am opposed to the proposed general plan update and draft of the EIR and want this letter entered into the official public record to record my opposition.

All of us have very full lives that are further complicated by the Covid Pandemic restrictions and modifications to our lives. I feel an extension would be justified so that we could better ask question and make comments on the entire process and was disappointed that you refused this small and perfectly reasonable curtesy. So given the short amount of time in which to assimilate more than 500 pages of documentation. Despite there having many concerns, I only had time to concentrate on my biggest concern which is to keep our 2006 general plan land uses in the NE.

CEQA has identified two alternatives that protect the NE end of Moreno Valley:

- 6.4 - Reduced Growth Alternative

and

- 6.5 Redistributed Growth Alternative (which has been identified as 6.6 Environmentally Superior Alternative)

I believe both of these alternatives will retain our 2006 general plan land uses in the NE and either one would be the best choice and the most appropriate action to take. There are many valid reasons to maintain the General Plan 2006 land uses in the NE and among them would be to knowledge that our current General Plan was finalized after a many studies, the existing infrastructure, professional and citizen input, an effort to protect it's uniqueness, open spaces, and maintain diversity. Many moved into this area and have worked hard to protect it since the incorporation of our city in 1984. This area and it's infrastructure supports the rural nature, large septic system lots, and should continue to be protected, as your predecessors have.

I, along with many residents, were shocked to find out that even though we're all dealing with a life altering pandemic our city leaders were moving forward on the GPU denying requests

- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 2 The Draft EIR was circulated for a 45-day public review period consistent with the requirements of CEQA Guidelines section §21091(a). The 45-day public review period began April 2, 2021 and ended May 17, 2021. An extension of the review period is not warranted.
- 3 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 4 All comments will be provided to the decision makers for consideration. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 5 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 6 As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initial outreach included stakeholder interviews, six 'pop-up' outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members (Draft EIR page 2-9). The City formed the General Plan Advisory Committee (GPAC), as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU. Additional community-wide surveys and multiple public meetings were held between December 2019 and May 2020, with close to 1,000 community members participating in the 2021 GPU process. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

from the public to postpone until full public participation was possible.

Refusing postponement of GPU updates denies Moreno Valley's citizens of our rights to:

- GPU committee meeting minutes that by law are public records
- Public participation in all GPU committee meetings
- Public discussions
- Public studies
- Important components that are an integral part of updating a general plan.
- Taking part in monumental and possibly life altering decisions
- Interaction and exchange of ideas and information between the public who's lives it will impact.

6  
Cont.

Mayor Gutierrez & Victoria Baca's actions, votes, and decisions demonstrate the power and control developer's Iddo Benzeevi and Nelson Chung's unproportionately large political contributions have on them. Evidenced by the fact that both Iddo Benzeevi (w/c, Highland Fairview, warehouses) and Nelson Chung (Pacific Communities of giant houses on tiny lots) led the General Plan Update Committee along with their supporters, Carlos Lopez, and planning commissioners, Joann Stephens, Alvin DeJohnette, and Ray Baker.

7

Iddo Benzeevi & Nelson Chung are making General Plan Updates for their personal financial gain as quickly as they can. There's no hurry to update our 2016 General Plan. Other cities have postponed such important, non urgent, decisions until the public can take an active roll once Covid restrictions allow it. Moreno Valley is using Covid restrictions to their benefit in a bid to make updates final without

holding public meeting or discussions, with out studies open to the public, and try to find a list of the General Plan Committee members names on line.

8

So despite Moreno Valley's mission statement touting ... citizen involvement, local control, enhancing the quality of life, treating people equally and fairly, exemplify good government by operating a city business that is open, respect and conserve our environmental resources for the health and enjoyment of our citizens and future generations, and to transform our city that it offers its residents unsurpassed quality...we've been, allowed, almost zero citizen involvement in the 2040 General Plan Update that's supposed reflect the priorities of our community and include the creation of a climate action plan and and EIR (Environmental Impact Report) that evaluates the environmental impacts of the updates being proposed. Impacts such as adverse increases in population, pollution, noise, traffic, route changes, loss of property values if proposed changes take place, and loss of open spaces, vistas, and aesthetics.

7 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

8 See response to comment 6 of this letter above.

LETTER

RESPONSE

Actions speak volumes and it is clear the city doesn't want full public participation in the GPU.

Most NE residents who live in some of the most negatively impacted areas have received no notification from the city. The city picks and chooses what to publicize as is evident when the city floods FaceBook with multiple posts per day but does nothing of the kind for general plan updates. This is a perfect example of how the city is failing to make sure the public is kept well informed throughout this process.

8  
Cont.

The current bias committee members should recuse themselves, or be recused and a new committee should be formed of an unbiased representative selection of citizens chosen or appointed to speak for their community and it's districts. This committee can review and make changes or start fresh and with Moreno Valley's citizens help update the 2006 General Plan.

9

Again I, Susan Zeitz, am opposed to the proposed general plan update and draft of the EIR and want this letter entered into the official public record to record my opposition. I want to keep our 2006 general plan land uses in the NE.

10

Susan Zeitz

26386 Ironwood Ave.

Moreno Valley, Ca. 92555

9 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

10 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

Letter I-57

**From:** S.Z.  
**To:** Chris Ormsby; David Marmorez; Ulises Cabrera; Dr. Yeshan A. Gutierrez; Victoria Baca; S.Z.  
**Subject:** I want an extension given to read the proposals for the general plan update.  
**Date:** Tuesday, April 20, 2021 4:19:29 PM

**Warning: External Email – Watch for Email Red Flags!**

I need more time to read, study, research, and assimilate the drafts of the EIR, Climate Action Plan, and documents concerning the General Plan Update and the changes being proposed as they differ greatly from our current General Plan.

1

I want to make sure any proposed updates are benefit everyone. Proposed changes can't bring more negative impact to my life, health, property value, or infrastructure. I might have to wait for answers to questions that I have. That all takes time.

2

I was among the citizens watching and being a part of the first General Plan in 1984, as well as many of its updates. These plans all protected us from adverse impacts to the natural environment and to us. This is why we still have so much open space in the NE Moreno Valley area where we moved to because of the rural area.

3

I'm concerned and about the limited amount of time I've been given get through all the documents. It's a lot to understand and it looks like they are not protecting us like the current and past General Plans.

4

I haven't been able to be as involved as I'd like this past year or more. It has been difficult to know what is going on. I can't even find the names of those on the General Plan Update Committee on the city's website.

5

I know we asked that the General Plan Update to be postponed because there was a lot of time and no hurry to work on it and no need to rush when it's so important so I see no reason an extension of at least 30days can't be given so I can't get through all this material.

6

Thank You,  
 David Zeitz

- 1 The Draft EIR was circulated for a 45-day public review period consistent with the requirements of CEQA Guidelines section §21091(a). The 45-day public review period began April 2, 2021 and ended May 17, 2021. An extension of the review period is not warranted.
- 2 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. The Draft EIR discloses all potential environmental impacts associated with the General Plan Update, Housing Element Update, and Climate Action Plan.
- 3 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR. See response to comment 1 above.
- 5 Over the course of this project, the City maintained a website (MV CDD: 2040 General Plan Update [www.moval.org.2040] that includes project documents and resources, details about meetings and participation opportunities, and provides links to the video and materials from public workshops for those who were not able to attend. As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. The City also formed the General Plan Advisory Committee (GPAC), who “served as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU” (page 2-9). Information regarding the GPAC members is on the website under past events. Their last meeting was on November 19, 2020. The video from their last meeting is available for downloading at: <http://www.moval.org/cdd/documents/general-plan-participate.html>. The members on the General Plan Advisory Committee were:
  - Chair DeJohnnette
  - Vice-Chair Baker
  - Joann Stephan
  - Iddo Benzeevi
  - Nelson Chung
  - Dr. Bobby Sheffield
  - Carlos Lopez
- 6 See response to comment 1 above.



LETTER

RESPONSE

Letter I-58

From: S.Z.  
To: Chris Cornsby  
Subject: GPU comments May 17 2021  
Date: Monday, May 17, 2021 4:53:48 PM

Warning: External Email – Watch for Email Red Flags!

May 17, 2021

David Zeitz am in Opposition of the General Plan Update

Dear council, staff, planning commission and residents.

I'm opposed to the proposed general plan update and draft of the EIR and want this letter entered into the official public record to record my opposition.

In addition to trying to make a living my live is further complicated by Covid Pandemic restrictions and modifications I've had to make my life. An extension was denied and 500 pages of documentation is a lot but I want to be sure that we don't lose our 2006 general plan land uses in the NE.

Either of the two CEQA identified two alternatives that protect the NE end of Moreno Valley, 6.4 - Reduced Growth Alternative or 6.5 Redistributed Growth Alternative (which has been identified as 6.6 Environmentally Superior Alternative) will retain our 2006 general plan land uses in the NE and either one would be the best choice and the most appropriate action to take.

Of the many valid reasons to maintain the General Plan 2006 land uses in the NE is the fact that our current General Plan 2006 was finalized after a lot of hard work, many studies, and that took in the facts about our existing infrastructure, professional and citizen input, an effort to protect it's uniqueness, open spaces, and maintain diversity. I moved to this area and have worked hard to protect it since the incorporation of our city in 1984. This area and it's infrastructure supports the rural nature, large septic system lots, and should continue to be protected, as your predecessors have.

I found it hard to believe that even though we're all dealing with a life altering pandemic you were moving forward on the GPU denying requests from the public to postpone until full public participation was possible.

Ido Benzeevi & Nelson Chung are making General Plan Updates for their personal financial gain as quickly as they can. There's no hurry to update our 2016 General Plan. Other cities have postponed such important, non urgent, decisions until the public can take an active roll once Covid restrictions allow it. Moreno Valley is using Covid restrictions to their benefit in a bid to make updates final without holding public meeting or discussions, with out studies open to the public.

1  
2  
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- 1 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 2 The Draft EIR was circulated for a 45-day public review period consistent with the requirements of CEQA Guidelines section §21091(a). The 45-day public review period began April 2, 2021 and ended May 17, 2021. An extension of the review period is not warranted.
- 3 All comments will be provided to the decision makers for consideration. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 4 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 5 As described in Section 2.1.4 of the Draft EIR, the City conducted numerous public outreach efforts. Initial outreach included stakeholder interviews, six 'pop-up' outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members (Draft EIR page 2-9). The City formed the General Plan Advisory Committee (GPAC), as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU. Additional community-wide surveys and multiple public meetings were held between December 2019 and May 2020, with close to 1,000 community members participating in the 2021 GPU process. This comment does not suggest an inadequacy in the analysis of the Draft EIR.
- 6 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

LETTER

RESPONSE

Mayor Gutierrez & Victoria Baca's actions, votes, and decisions demonstrate the power and control developer's Iddo Benzeevi and Nelson Chung's unproportionately large political contributions have on them. Evidenced by the fact that both Iddo Benzeevi (w/c, Highland Fairview, warehouses) and Nelson Chung (Pacific Communities of giant houses on tiny lots) led the General Plan Update Committee along with their supporters, Carlos Lopez, and planning commissioners, Joann Stephens, Alvin DeLohnette, and Ray Baker.

6  
Cont.

I've been, allowed, almost zero citizen involvement in the 2040 General Plan update that's supposed reflect the priorities of our community and include the creation of a climate action plan and and EIR (Environmental Impact Report) that evaluates the environmental impacts of the updates being proposed. Impacts such as adverse increases in population, pollution, noise, traffic, route changes, loss of property values if proposed changes take place, and loss of open spaces, vistas, and aesthetics. It's is clear the city doesn't want full public participation in the GPU. Most NE residents who live in some of the most negatively impacted areas have received no notification from the city.

7

I ask that the current bias committee members should recuse themselves, or be recused and a new committee should be formed of an unbiased representative selection of citizens chosen or appointed to speak for their community and it's districts. So the new committee can review and make changes or start fresh and with Moreno Valley's citizens help update the 2006 General Plan.

8

I opposed to the proposed general plan update and draft of the EIR. Record this letter in the official public record as opposed.

9

Keep the 2006 general plan land uses in the NE.

10

David Zeltz  
26386 Ironwood Ave.  
Moreno Valley, Ca. 92555

7 See response to comment 5 of this letter above.

8 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

9 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.

10 Comment noted. This comment does not suggest an inadequacy in the analysis of the Draft EIR.



**Final Environmental Impact Report  
for the MoVal 2040: Moreno Valley  
Comprehensive General Plan  
Update, Housing Element Update,  
and Climate Action Plan  
SCH # 2020039022**

*Prepared for*  
City of Moreno Valley  
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RECON Number 9504  
May 20, 2021

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 B: Air Quality Output  
 C: Tribal Letters and Responses  
 D: Noise Output  
 E: Vehicle Miles Traveled Impact Assessment Memorandum



## List of Abbreviations/Acronyms

°F	degrees Fahrenheit
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ADP	area drainage plans
AF	acre-feet
AFFH	Affirmatively Furthering Fair Housing
AIA	Airport Influence Area
AICUZ	Air Installation Compatibility Use Zone
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMI	Area Median Income
AQMP	air quality management plan
ATMS	Advanced Traffic Management System
AV	autonomous vehicle; assessed value
Basin	South Coast Air Basin
Basin Plan	Regional Water Quality Control Board - Santa Ana Region Basin Plan
BAU	business as usual
BEP	Business Emergency Plan
BMP	best management practice
BSMWC	Box Springs Mutual Water Company
BUG	backlight, up light, and glare
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire
CalARP	California Accidental Release Prevention Program
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CCTV	closed circuit television
CDC	California Department of Conservation
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission

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CEMU	Center Mixed Use
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERT	Community Emergency Response Team
CESA	California Endangered Species Act
CETAP	Community and Environmental Transportation Acceptability Process
CFR	Code of Federal Regulations
CGP	Construction General Permit
CGS	California Geological Survey
CH <sup>4</sup>	Methane
CIP	Capital Improvement Project
City; city	City of Moreno Valley
CLUP	Comprehensive Land Use Plan
CMP	Congestion Management Plan
CMS	Congestion Management System
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
COMU	Corridor Mixed Use
county	county of Riverside
CPTED	Crime Prevention Through Environmental Design
CPUC	California Public Utilities Commission
CRA	Colorado River Aqueduct
CREATE	Chicago Rail Efficiency and Transportation Efficiency
CRGP	County of Riverside General Plan
CRHR	California Register of Historic Resources
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dB(A)	A-weighted decibel
DIF	Development Impact Fee
DMS	Dynamic Message Signs
DOT	Department of Transportation
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DWR	Department of Water Resources
ECSD	Edgemont Community Services District
EIC	Eastern Information Center
EIR	environmental impact report
EMS	Emergency Medical Services
EMWD	Eastern Municipal Water District
EO	Executive Order
EOC	Emergency Operations Center
EPA	Environmental Protection Agency
<u>EV</u>	<u>electric vehicles</u>
FAA	Federal Aviation Administration

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FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHSV	Fire Hazard Severity Zone
FHSZs	Fire Hazard Severity Zones
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program (
FPP	fire protection plan
FTA	Federal Transit Authority
GHG	greenhouse gas
GIS	geographic information system
GPU	General Plan Update
GWP	global warming potential
HBP	home-based production
HBWA	home-based-work attraction
HCP	Habitat Conservation Plan
HMBEP	Hazardous Materials Business Emergency Plan
HMERT	Hazardous Materials Response Team
HMMA	Hazardous Materials Management Act
HOV	high occupancy vehicle
HVAC	heating, ventilation, and air conditioning
HWCL	Hazardous Waste Control Law
I-215	Interstate 215
ICLEI	International Council for Local Environmental Initiatives
IGP	Industrial General Permit
in/sec	inch per second
IPA	Inland Port Airport
ITS	Intelligent Transportation Systems
ITS	Incidental Take Statement
kWh	kilowatt hours
LCC	Land Use and Community Character
$L_{eq}$	hourly equivalent sound level
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
$L_{max}$	maximum sound level
LOS	Level of Service
LRA	Local Responsibility Area
LST	Localized Significance Threshold
LUCC	Land Use and Community Character
MARB	March Air Reserve Base
MATES	Multiple Air Toxics Exposure Study
MBTA	Migratory Bird Treaty Act
MDP	master drainage plan
MLD	Most Likely Descendent
MMT CO <sub>2</sub> E	million metric tons of carbon dioxide equivalent
mpg	miles per gallon
mph	miles per hour
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone

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MS4	Municipal Separate Storm Sewer System
MSHCP	Western Riverside County Multiple Species Habitat Conservation Plan
MT CO <sub>2</sub> E	metric tons of carbon dioxide equivalent
Municipal Code	City of Moreno Valley Municipal Code
MVC	Moreno Valley College
MVFD	Moreno Valley Fire Department
MVPD	Moreno Valley Police Department
MVU	Moreno Valley Electric Utility
MVUSD	Moreno Valley Unified School District
MWD	Metropolitan Water District of Southern California
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Planning
NO <sub>2</sub>	nitrogen dioxide
NOP	Notice of Preparation
NO <sub>x</sub>	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
<u>NZE</u>	<u>near zero emission</u>
OD	Origin/Destination
OEM	Office of Emergency Management
OPSC	Office of Public School Construction
OSRC	Open Space and Resource Conservation
PA	Production/Attraction
Pb	lead
PCE	tetrachloroethylene
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in diameter
PPV	peak particle velocity
PRC	Public Resources Code
project	MoVal 2040 Project EIR
PV	photovoltaic
PVL	Perris Valley Line
RA2	Residential Agriculture 2
RCFC&WCD	Riverside County Flood Control District and Water Conservation District
RCFD	Riverside County Fire Department
RCHCA	Riverside County Habitat Conservation Agency
RCRA	Resource Conservation and Recovery Act
RCTC	Riverside County Transportation Commission
RHNA	Regional Housing Needs Allocation
RIVTAM	Riverside Traffic Analysis Model
RMP	Risk Management Plan
ROW	right-of-way
RPS	Renewable Portfolio Standard
RTA	Riverside Transit Agency
RTP	Regional Transportation Plan

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RWQCB	Regional Water Quality Control Board
RWRF	regional water reclamation facility
SAR	Santa Ana Region
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCRRA	Southern California Regional Rail Authority
SCS	Sustainable Communities Strategy
SGMA	Sustainable Groundwater Management Act
SHMA	Seismic Hazard Mapping Act
SIP	State Implementation Plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMARA	Surface Mining and Reclamation Act
SMBMI	San Manuel Band of Luiseño Indians
SO <sub>2</sub>	sulfur dioxide
SOI	Sphere of Influence
SR-60	State Route 60
SRA	State Responsibility Area
SRRE	Source Reduction and Recycling Element
SSMP	Sewer System Management Plan
State Water Board	California State Water Resources Control Board
SWP	State Water Project
SWPPP	storm water pollution prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TCE	trichloroethylene
TCPs	Traditional Cultural Properties
TCRs	tribal cultural resources
TDM	Transportation Demand Management
TIA	Transportation Impact Assessment
TMC	Traffic Management Center
TMC	Transportation Management Center
TRI	Toxics Release Inventory
TSM	Transportation System Management
TUMF	Transportation Uniform Mitigation Fee
UCR	University of California, Riverside
URM	unreinforced masonry
USACE	United States Army Corps of Engineers
USC	United States Code
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VdB	vibration decibel
VMT	vehicle miles traveled
VOC	volatile organic compounds
VVUSD	Val Verde Unified School District
WLC	World Logistics Center

WMWD	Western Municipal Water District
WPLT	Western Pluvial Lakes Tradition
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments
WRCRCA	Western Riverside County Regional Conservation Authority
WWI	World War I
<u>ZE</u>	<u>zero emission</u>

# Executive Summary

## S.1 Introduction

Consistent with Section 15168 of the California Environmental Quality Act (CEQA) Guidelines, this Draft Environmental Impact Report (EIR) provides a programmatic analysis of the environmental impacts associated with implementation of the goals, policies, actions, and projected buildout of the following three planning documents:

- 2021 General Plan Update (GPU)
- 2021-2029 Housing Element Update
- Climate Action Plan (CAP)

These three separate planning documents are collectively referred to as the MoVal 2040 Project (project).

As described in Section 15168 of the CEQA Guidelines, program-level environmental review documents are appropriate when a project consists of a series of actions related to the issuance of rules, regulations, and other planning criteria. The project which is the subject of this EIR consists of long-term plans that will be implemented as policy documents guiding future development activities and related City of Moreno Valley (City) actions. The purpose of this program-level EIR is intended to inform decision-makers and the general public of the potential significant environmental impacts of the project. This program-level EIR also considers the availability of mitigation measures to minimize the project's significant impacts and evaluates reasonable alternatives to the project that may reduce or avoid one or more significant environmental effects.

A brief overview of each EIR chapter is provided below:

**Executive Summary:** Summarizes the EIR by providing an overview of the project, analysis of the potentially significant environmental impacts that could result from the project, a list of mitigation measures identified to reduce or avoid such impacts, a review of the alternatives to the project, including the identification of an environmentally superior alternative to the project.

**1.0 Introduction:** Provides an overview of the applicable legal authority, introduces the purpose for the EIR and explains the EIR process and the intended uses of the EIR.

**2.0 Environmental Setting:** Provides a description of the project's regional context, location, and existing physical characteristics and land use within the Planning Area. More

detailed descriptions of the environmental context pertaining to specific environmental topics are provided in each section of Chapter 4: Environmental Analysis.

**3.0 Project Description:** Provides a detailed description of the project, including the purpose and objectives of the project and descriptions of each component of the project (2021 GPU, Housing Element Update, and CAP).

**4.0 Environmental Analysis.** Analyzes the environmental impacts of the project. Impacts are organized by the following topic areas:

- 4.1 Aesthetics
- 4.2 Agriculture and Forestry Resources
- 4.3 Air Quality
- 4.4 Biological Resources
- 4.5 Cultural and Tribal Cultural Resources
- 4.6 Energy
- 4.7 Geology/Soils
- 4.8 Greenhouse Gas Emissions
- 4.9 Hazards & Hazardous Materials
- 4.10 Hydrology/Water Quality
- 4.11 Land Use/Planning
- 4.12 Mineral Resources
- 4.13 Noise
- 4.14 Population/Housing
- 4.15 Public Services and Recreation
- 4.16 Transportation
- 4.17 Utilities/Service Systems
- 4.18 Wildfire

Each topic area respectively provides a contextual description of the project's environmental setting, significance criteria, methodology, and potential impacts.

**5.0 CEQA Mandated Analysis:** Summarizes the project's significant and unavoidable environmental impacts, significant irreversible environmental changes, and growth-inducing impacts.

**6.0 Project Alternatives:** This chapter presents a reasonable range of alternatives to the project and includes the following:

- A discussion of the environmental impacts associated with each alternative
- A comparison of the relative impacts of each alternative to those of the project
- A discussion of the relationship of each alternative to the project's objectives, and
- Identification of the environmentally superior alternative.

**7.0 EIR References:** Lists documents and other information sources relied upon in the preparation of the EIR and identifies the persons and organizations that contributed to the preparation of the EIR.



## S.2 Project Overview

The city of Moreno Valley (city) is located within the northwestern portion of Riverside County in the southern Inland Empire portion of the State of California. Moreno Valley is located approximately 63 miles east of downtown Los Angeles, 49 miles east of the city of Irvine, and 43 miles west of the city of Palm Springs. State Route 60 (SR-60), which runs through the northern portion of Moreno Valley (east and west direction), and Interstate 215 (I-215), which runs in proximity to the westerly city limits (north and south direction), serve to connect the city to other communities throughout the region. The city is accessible via public transportation by rail, through Metrolink located approximately one-half mile west of the city limits, and accessible via aircraft at the March Inland Port located at the March Air Reserve Base (MARB), which is located south and west of the city limits.

California Government Code Section 65300 et seq. mandates that all counties and incorporated cities prepare a general plan that establishes policies and standards for future development, housing affordability, and resource protection. State law encourages cities to keep general plans current through regular periodic updates. The project includes an update to the 2006 General Plan that would guide future land use decisions in Moreno Valley, provide a long-term vision for the city, and provide policies and implementing actions that would allow the city to achieve this vision over the life of the General Plan. The General Plan is the primary policy document guiding growth and development within the city through the planning horizon year of 2040. Together with the Zoning Ordinance and related sections of the Municipal Code, the 2021 GPU would serve as the basis for planning-related decisions made by City staff, the Moreno Valley Planning Commission, and the Moreno Valley City Council.

The project includes an update to the currently adopted 2014 Housing Element. The Housing Element is one of the state-mandated elements that must be included in the City's General Plan. State law mandates that the Housing Element include certain items, such as a Housing Needs Assessment; goals, policies, and objectives regarding housing in Moreno Valley; and implementation programs to work toward achieving such goals. As part of the project, the City will prepare a Sixth Cycle Housing Element Update to cover the eight-year planning period from October 2021 through October 2029 and outline a plan for accommodating Moreno Valley's share of the regional housing need, currently determined to be a total of 13,627 newly constructed residential dwelling units. As required by the State of California, the City must zone sufficient land for housing affordable to persons at all income levels.

The project includes preparation of a CAP. The CAP is a community-wide strategy for reducing greenhouse gas (GHG) emissions for the purpose of adapting to the effects of climate change. Preparation of the CAP includes establishing the City's GHG reduction targets as well as specific strategies and implementing actions to achieve these targets.

## S.3 EIR Process

The Notice of Preparation (NOP) was circulated on March 9, 2020, and a scoping meeting was held on Saturday, March 14, 2020 at the City Hall – Council Chambers, located on

14177 Frederick Street, Moreno Valley, California. The NOP circulated for analysis of the project, related letters received, and comments made during the scoping meeting are included as Appendix A of this EIR. The Draft EIR was circulated for public review for a period commencing April 2, 2021 through May 17, 2021 (Public Review Period). The Draft EIR and all related appendices have been made available for public review and inspection during the Public Review Period at City Hall, located on 14177 Frederick Street, Moreno Valley, California, and on the Community Development Department's Current Projects webpage at:

<http://www.moreno-valley.ca.us/cdd/documents/about-projects.html>

Copies of the Notice of Availability of the Draft EIR were also available at the City's three public library branches, located:

- Main Branch, located at 25480 Alessandro Boulevard
- Mall Branch located at 22500 Town Circle
- Iris Plaza Branch located at 16170 Perris Boulevard

## **S.4 Areas of Controversy**

Environmental impacts classified as significant and unavoidable have been identified in the resource topics of Agricultural Resources, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Noise, and Transportation, which may be controversial to the general public, agencies, or stakeholders. Table S-1 lists significant and unavoidable impacts, summarizes the results of the impact analysis, and lists applicable mitigation measures.

## **S.5 Project Alternatives**

CEQA Guidelines Section 15126.6 requires that the EIR compare the effects of a "reasonable range of alternatives" to the effects of the project. The CEQA Guidelines further specify that the project alternatives selected should attain most of the basic project objectives and avoid or substantially lessen one or more significant effects of the project. The "range of alternatives" is governed by the "rule of reason," which requires the EIR to set forth only those project alternatives necessary to permit an informed and reasoned choice by the City, as the Lead Agency, and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

Project alternatives are evaluated in Chapter 6 of this EIR. The evaluations analyze the ability of each project alternative to further reduce or avoid the significant environmental effects of the project. Each major environmental topic that was determined to have significant impacts has been given consideration in the alternatives analysis. This EIR evaluates three project alternatives: the No Project Alternative (continuation of the existing 2006 General Plan), the Reduced Growth Alternative, and Redistributed Growth Alternative.

### **S.5.1 No Project Alternative**

Under the No Project Alternative, the proposed amendments to the adopted General Plan, Housing Element Update, and adoption of the CAP would not occur. Growth in the city would continue to be guided by the existing land use plans and programs. Specifically, a summary of existing land uses is provided in Table 4.11-1, with existing land uses shown on Figure 4.11-1. Under the No Project Alternative, development would continue to occur through site-specific rezoning and General Plan amendment actions, rather than through a comprehensively planned approach. The planned densities needed to accommodate the region's housing needs and provide the required levels of affordability would not occur. Planning for mobility infrastructure would continue as it currently exists, without a comprehensive mechanism to direct vehicle miles travelled reducing infrastructure in areas with the greatest potential to achieve citywide vehicle miles traveled (VMT) reductions.

### **S.5.2 Reduced Growth Alternative**

The Reduced Growth Alternative would revise the proposed land use map to reduce the amount of employment growth compared to the project (see Figure 6-1). This alternative would reduce the maximum permitted floor area ratio (FAR) proposed within the Community Corridors along Sunnymead Boulevard, Alessandro Boulevard, Perris Boulevard, and Heacock Street. This would reduce the amount of non-residential development within these Community Corridors by approximately 10 to 15 percent compared to the project. This alternative would also remove the proposed Center Mixed Use within the District Specific Plan area, and reduce the footprint of the Downtown Center Concept Area by approximately 111 acres. Additionally, a portion of the proposed Highway Office/Commercial Concept Area located north of SR-60 would not receive this new designation; instead, the existing office and residential land use designations from the existing 2006 General Plan would remain.

### **S.5.3 Redistributed Growth Alternative**

The Redistributed Growth Alternative would result in the same level of growth as the proposed plan, but would redistribute growth from the proposed Community Corridor Concept Areas to the Downtown Center Concept Area (see Figure 6-2). This alternative would reduce the maximum permitted density and intensity in the Community Corridor Concept Areas, thereby reducing future development proposed along Sunnymead Boulevard, Alessandro Boulevard, Perris Boulevard, and Heacock Street by approximately 10 to 15 percent compared to the project. The reduced growth capacity from these areas would be redistributed to the Downtown Center Concept Area. This alternative would also remove a portion of the proposed Highway Office/Commercial Concept Area located north of SR-60 with the existing office and residential land use designations from the existing 2006 General Plan being retained. Redistribution of land uses associated with this alternative would not alter the total amount of residential, commercial, and office land uses compared to the project.

## S.5.4 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify the environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives. However, the project itself may not be identified as the environmentally superior alternative.

The Redistributed Growth Alternative is the environmentally superior alternative because it would incrementally reduce significant impacts associated with air quality, agricultural resources, biological resources, noise, and transportation. Although impacts related to cultural and tribal cultural resources would remain the same as this project, this alternative would reduce most significant impacts, but not to below a level of significance, while still meeting most objectives of the project. However, ~~development land~~ within the Downtown Center ~~is not housing ready, and~~ would take more time and investment to accommodate housing units needed to achieve the City's Regional Housing Needs Allocation (RHNA) targets compared to what could be achieved along the Community Corridors proposed under the project. Additionally, the higher density along community corridors is desired in order to activate these key corridors with a mix of uses that promote active community gathering places. Therefore, the Redistributed Growth Alternative is not recommended for adoption, since it would not likely achieve the same level of housing needed to satisfy the City's RHNA requirements within the City's mandated timeframe and would not provide the same level of corridor activation.

## S.6 Summary Table

Table S-1 summarizes the results of the environmental analysis including the potentially significant environmental impacts of the project and proposed mitigation measures to reduce or avoid these impacts. Impacts and mitigation measures are organized by issue in Chapter 4, Environmental Analysis.

**Table S-1  
Summary of Environmental Impacts**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
<b>4.1 Aesthetics</b>			
Would the project have a substantial adverse effect on a scenic vista?	Adherence to applicable Municipal Code design requirements and 2021 GPU policies would ensure that future development would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?	There are no state-designated or eligible scenic highways within the Planning Area. No impact would occur.	N/A	<b>No Impact</b>
In non-urbanized areas, would the project 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 points)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Adherence to applicable 2021 GPU policies and Municipal Code requirements would ensure that future development would not degrade the existing visual character or visual character or quality public views of the site and its surroundings or conflict with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	Adherence to applicable state building standards and Municipal Code regulations aimed at protecting against the effects of light and glare on day and nighttime views in the Planning Area would ensure that future development would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
<b>4.2 Agriculture and Forestry Resources</b>			
Would the project 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?	Implementation of the GPU would impact Prime Farmland and Farmland of Local Importance within proposed Concept Areas and would result in development of other agricultural lands that have the potential to convert additional Farmland to non-farming uses. Although the conversion of Farmland was anticipated and evaluated under the 2006 General Plan EIR, some vacant FMMP designations remain that could be converted to non-agricultural uses, which would be considered significant.	The project, like the 2006 General Plan, does not propose any permanent preservation of agricultural land, but allows agriculture as an interim use prior to development. Thus, preservation of agricultural resources would not be feasible as it would be inconsistent with General Plan goals and EIR project objectives.	<b>Significant and Unavoidable</b>
Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?	No conflicts with agricultural zoning would occur as the City does not have any exclusive agriculture zones and the project does not include any rezoning. No conflicts with Williamson Act Contracts would occur as no land use changes are proposed within or adjacent to a Williamson Act Contract. Impacts related to agricultural zoning and Williamson Act Contracts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?	The City does not possess any zoning classifications for forestland, timberland, or timberland production zones. No impact would occur.	N/A	<b>No Impact</b>
Would the project result in the loss of forest land or conversion of forest land to non-forest use?	The Planning Area does not possess any forestland. No impact would occur.	N/A	<b>No Impact</b>

**Table S-1  
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Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	Implementation of the project would intensify uses within the Planning Area in a manner that would reduce the feasibility of agricultural production. Therefore, the project would potentially result in indirect conversion of potential farmland resources to non-agricultural uses, which would be considered a significant impact.	The project, like the 2006 General Plan, does not propose any permanent preservation of agricultural land, but allows agriculture as an interim use prior to development. Thus, preservation of agricultural resources would not be feasible as it would be inconsistent with General Plan goals and EIR project objectives.	<b>Significant and Unavoidable</b>
<b>4.3 Air Quality</b>			
Would the project conflict with or obstruct implementation of the applicable air quality plan?	The project would not exceed the assumptions used to develop the AQMP, and the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. Therefore, the project would not conflict with implementation of the AQMP, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project 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 standards?	<p>Construction</p> <p>The scale and extent of construction activities associated with buildout of the Planning Area could exceed the relevant SCAQMD thresholds for some projects. Construction impacts would be potentially significant.</p> <p>Operation</p> <p>The project would not conflict with implementation of the AQMP, and emissions associated with project buildout would be less than emissions associated with buildout of the existing 2006 General Plan. Therefore, the operation of the project would not result in a cumulatively considerable net increase in emissions, and impacts would be less than significant.</p>	<p><b>AQ-1:</b> Applications for future development, wherein the Director of Community Development or his or her designee has determined a potential for air quality impacts associated with construction, shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City for review and approval. The Director of Community Development or his or her designee shall make this determination based on the size of the project, whether the project would require a transportation impact analysis, or other criteria. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality <u>regional and local</u> impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's adopted <u>regional and localized construction CEQA</u> thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions could include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Require fugitive-dust control measures that exceed SCAQMD's Rule 403 requirements, such as: <ul style="list-style-type: none"> <li>○ Use of nontoxic soil stabilizers to reduce wind erosion.</li> <li>○ Apply water every four hours to active soil-disturbing activities.</li> <li>○ Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.</li> </ul> </li> <li>• <u>Encourage the use of construction equipment equal to or greater than 50 horsepower be electrically powered or alternatively fueled. At a minimum, use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 Final (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. Include this requirement in applicable bid documents, purchase orders, and contracts.</u></li> <li>• Ensure that construction equipment is properly serviced and maintained to the manufacturer's standards.</li> <li>• Limit nonessential idling of construction equipment to no more than five consecutive minutes.</li> </ul>	<p>Construction Emissions - <b>Significant and Unavoidable.</b> Implementation of mitigation measure AQ-1 would reduce criteria air pollutant emissions from construction-related activities; however, construction time frames and equipment for site-specific development projects are not available at this time, multiple development projects constructed at the same time could result in significant construction-related emissions.</p> <p>Operational Emissions – <b>Less than Significant.</b></p>

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Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		<ul style="list-style-type: none"> <li>• Limit on-site vehicle travel speeds on unpaved roads to 15 miles per hour.</li> <li>• Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area.</li> <li>• Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the SCAQMD's website.</li> </ul>	
<p>Would the project expose sensitive receptors to substantial pollutant concentrations?</p>	<p><b>CO Hot Spots</b></p> <p>The project would not result in an increase in traffic volumes at any intersection that would create or contribute to a CO hot spot. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations associated with CO hot spots, and impacts would be less than significant.</p> <p><b>Toxic Air Emissions</b></p> <p>Construction: Considering the highly dispersive nature of DPM, ongoing implementation of USEPA and CARB requirements, and the fact that construction activities would occur intermittently and at various locations over the lifetime of project buildout, construction of future development would not expose sensitive receptors to substantial DPM concentrations. Therefore, the project would not expose sensitive receptors to toxic air emissions, and impacts would be less than significant.</p> <p>Stationary Sources: Emissions of TACs would be controlled by SCAQMD through permitting and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under SCAQMD Rule 1401. Therefore, adherence with this regulatory framework would ensure that future development would not expose sensitive receptors to TACs associated with stationary sources within the Planning Area, and impacts would be less than significant.</p> <p>Mobile Sources: Consistent with the goals of CARB's handbook, the 2021 GPU proposes goals and policies to ensure site-specific planning and building design of future development would minimize exposure of sensitive receptors to mobile source emissions. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations associated with mobile source emissions, and impacts would be less than significant.</p>	N/A	<b>Less than Significant</b>
<p>Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</p>	<p>Construction odors would be temporary, intermittent, and not expected to affect a substantial number of people. The project's proposed land use map and adherence to existing regulations would ensure that future development would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.</p>	N/A	<b>Less than Significant</b>
<b>4.4 Biological Resources</b>			
<p>Would the project 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 CDFW or USFWS?</p>	<p>Buildout of the GPU would have the potential to directly or indirectly impact candidate, sensitive, or special status species through removal of habitat that supports sensitive species. While future site specific environmental review and application of regulations are likely to ensure adverse impacts to sensitive species are reduced to less than significant, it is not possible to ensure that every impact will be fully mitigated at a program level of analysis. Therefore, impacts would be significant.</p>	<p><b>BIO-1:</b> Applications for future development of vacant properties (and portions thereof), wherein the Director of Community Development or his or her designee has determined a potential for impacts to sensitive biological resources, shall be required to prepare a site-specific general biological resources survey to identify the presence of any sensitive biological resources, including any sensitive plant or wildlife species. The report shall identify the need for focused presence/absence surveys and identify the presence of state or federal regulated wetlands or waters. If</p>	<p><b>Significant and Unavoidable.</b> While implementation of mitigation measures BIO-1 and BIO-2 would reduce impacts on sensitive and special status species, it is not possible to ensure that every future project could fully mitigate potentially</p>

**Table S-1  
Summary of Environmental Impacts**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		<p>potentially significant impacts to sensitive biological resources, including sensitive species and/or wetlands are identified, the report shall also recommend appropriate mitigation to reduce the impacts to below a level of significance.</p> <p><b>BIO-2:</b> Applications for future development, wherein the Director of Community Development or his or her designee has determined a potential for impacts to mature trees and/or native vegetation suitable for nesting birds, shall be required to restrict removal of sensitive habitat and vegetation to outside the breeding seasons of any sensitive species identified within adjacent properties (typical bird breeding season is February 1–September 1. as early as January 1 for some raptors). If vegetation clearing must begin during the breeding season, a qualified biologist shall provide recommendations to avoid impacts to nesting birds which typically includes a pre-construction survey within 3 days of the start of construction to determine the presence of active nests. If active nests are found, avoidance measures shall be implemented to ensure protection of the nesting birds. Avoidance measures may include a no-activity buffer zone, typically 300 feet from the area of disturbance or 500 feet for raptors, established at the discretion of the qualified biologist in consultation with the City. If activity buffer zones are not feasible, temporary noise barriers may be installed to attenuate construction noise. Noise wall height and adequacy shall be supported by a noise analysis to determine the anticipated construction noise levels with attenuation measures as recommended by the biologist and approved by the City. Periodic noise monitoring shall be conducted during construction to ensure noise attenuation standards are met. Accepted noise levels are species dependent and existing ambient noise levels can play a factor in establishing baseline acceptable noise.</p>	<p>significant impacts despite the applicable regulatory framework. Therefore, impacts to candidate, sensitive, or special status species would remain significant and unavoidable at this program level of review.</p>
<p>Would the project 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 CDFW or USFWS?</p>	<p>Buildout of the GPU has the potential to impact a variety of riparian habitat types throughout the Planning Area. Future site-specific environmental review for development consistent with the GPU would ensure appropriate biological surveys are completed and would require adherence to applicable regulations and policies such as the MSHCP, state and federal wetland regulations, and policies in the Open Space and Resource Conservation Element of the GPU. While these regulations are likely to ensure adverse impacts to sensitive riparian habitats are reduced at the project level, at a program level of analysis it is not possible to ensure that every impact could be fully mitigated. Therefore, the project would have the potential to result in a substantial adverse effect on sensitive riparian habitats, and impacts would be significant</p>	<p>Refer to mitigation measure BIO-1</p>	<p><b>Significant and Unavoidable.</b> While implementation of mitigation measure BIO-1 would reduce impacts on riparian habitats, it is not possible to ensure that every future project could fully mitigate potentially significant impacts. Therefore, impacts to riparian habitats would remain significant and unavoidable at this program level of review.</p>
<p>Would the project 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>	<p>While subsequent development and redevelopment projects would be required to evaluate potential impacts on wetlands through project-level CEQA documentation and would be required to obtain applicable state and federal wetland permits, at a program level of analysis it is not possible to ensure that every impact would be fully mitigated. Therefore, the project would have the potential to result in a substantial adverse effect on wetlands, and impacts would be significant.</p>	<p>Refer to mitigation measure BIO-1</p>	<p><b>Significant and Unavoidable.</b> While implementation of mitigation measure BIO-1 would reduce impacts on wetlands, it is not possible to ensure that every future project could fully mitigate potentially significant impacts. Therefore, impacts to riparian habitats would remain</p>



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Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
			significant and unavoidable at this program level of review.
Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	The proposed land use plan is consistent with regional conservation goals and linkages needed to maintain wildlife movement. Future development would be required to undergo a site-specific environmental review including compliance with MSHCP conservation goals for wildlife corridors and linkages. Impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	Future projects would be required to comply with GPU policies that support protection of biologically significant habitats and demonstrate consistency with applicable local ordinances protecting biological resources. The project would not conflict with any local policies or ordinances protecting biological resources, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	The land use plan largely avoids MSHCP Conserved Lands, Criteria Cells, and Public/Quasi Public Lands. Any development within MSHCP Criteria Cells or other conserved status lands would require a discretionary review including a site-specific biological analysis including demonstrating compliance with MSHCP conservation goals. Project-specific environmental review and required compliance with the MSHCP and other applicable plans would ensure consistency with applicable habitat conservation plans. Impacts would be less than significant.	N/A	<b>Less than Significant</b>
<b>4.5 Cultural and Tribal Cultural Resources</b>			
Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	Analysis of impacts from future development on the built-environment would be required at the project level. Any alteration, relocation, demolition, or excessive groundborne vibration associated with future development that would affect historic buildings, structures, objects, landscapes, and sites would represent a significant impact to historical resources. Therefore, future projects would have the potential to result in a substantial adverse effect on historical resources, and impacts would be significant.	<b>CUL-1:</b> Prior to the issuance of any permit for a future development site-specific project that would directly or indirectly affect a building/structure in excess of 50 years of age, the City or a qualified architectural historian shall determine whether the affected building/structure is historically significant. The evaluation shall be based on criteria such as age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the CEQA guidelines. If the evaluation determines that building/structure is not historic, no further evaluation or mitigation would be required. If the building/structure is determined to be historically significant, the preferred mitigation would be to avoid the resource through project redesign. If the resource cannot be avoided, all prudent and feasible measures to minimize or mitigate harm to the resource shall be taken per recommendations of the qualified architectural historian.	<b>Significant and Unavoidable</b>
Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Analysis of impacts from future development on known and those-not-yet-found archaeological resources would be required at the project level. Any vegetation clearing/grubbing, grading, trenching, or excavation associated with future development that could expose buried prehistoric or historic-era archaeological resources would represent a significant impact to historical resources. Therefore, future projects would have the potential to result in a substantial adverse effect on historical resources, and impacts would be significant.	<b>CUL-2:</b> Prior to issuance of any permit for a future site-specific project that would potentially have a direct or indirect affect an archaeological resource, the City shall require the following steps be taken to determine: (1) the presence of archaeological resources, and (2) the appropriate mitigation for any significant resources which may be impacted by project development. The following steps would help determine the presence or absence of archaeological resources. Step 1: An archaeologist shall conduct records and background research at the Eastern Information Center for a list of recorded resources and request a sacred lands file search from the Native American Heritage Commission. Step 2: After review of this data, a pedestrian survey shall be conducted by a qualified archaeologist. Step 3: If through the research and the field survey, archaeological resources are identified, then an evaluation of significance shall	<b>Significant and Unavoidable</b>

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Summary of Environmental Impacts**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		<p>be completed by a qualified archaeologist. The evaluation program generally will include excavation to determine depth, extent, integrity, and content of the subsurface cultural material.</p> <p>Step 4: The results of the excavation will be evaluated using the Thresholds above in Section 4.5.4.</p> <p>Step 5: If an archaeological resource is determined significant and avoidance through project redesign is not feasible, a data recovery and construction monitoring program must be implemented to reduce the impacts the archaeological resource to below a significant level. The data recovery program must be approved by the City.</p> <p>Step 6: A final data recovery and/monitoring report shall be completed in accordance with the California Office of Historic Preservation's Archaeological Resource Management Reports: Recommended Content and Format. Confidential attachments must be submitted under separate covers. Artifacts collected during the evaluation and data recovery phases must be curated at an appropriate facility consistent with state (California State Historic Resources Commission's Guidelines for Curation of Archaeological Collection 1993) and federal curation standards (36 CFR 79 of the Federal Register) and that allows access to artifact collections.</p>	
<p>Would the project disturb any human remains, including those interred outside of dedicated cemeteries?</p>	<p>Analysis of impacts from future development on human remains would be required at the project level. Any vegetation clearing/grubbing, grading, trenching, or excavation associated with future development that would expose or disturb unknown human remains would represent a significant impact to human remains. Therefore, future projects would have the potential to result in a substantial adverse effect on historical resources, and impacts would be significant.</p>	<p><b>CUL-3:</b> If human remains are unintentionally disturbed during archaeological excavations or construction activities, implementation of the procedures set forth in PRC Section 5097.98 and California State Health and Safety Code 7050.5 would be implemented in consultation with the MLD as identified by the NAHC. California State Health and Safety Code Section 7050.5 dictates that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined by the County Coroner to be Native American, the NAHC shall be notified within 24 hours. The NAHC shall identify the MLD with whom consultation shall occur to determine in the treatment and disposition of the remains.</p>	<p><b>Significant and Unavoidable</b></p>
<p>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <ul style="list-style-type: none"> <li>a) Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or</li> <li>b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be</li> </ul>	<p>Analysis of impacts from future development on tribal cultural resources would be required at the project level. Any vegetation clearing/grubbing, grading, trenching, or excavation associated with future development that would affect tribal cultural resources represent a significant impact to Tribal cultural resources. Therefore, future projects would have the potential to result in a substantial adverse effect on tribal cultural resources, and impacts would be significant.</p>	<p>Refer to CUL-2 and CUL-3.</p>	<p><b>Significant and Unavoidable</b></p>

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Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
<p>significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American?</p>			
<b>4.6 Energy</b>			
<p>Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</p>	<p>Energy conservation measures required by applicable energy conservation regulations (e.g., CALGreen, Title 24) and energy conservation policies included in the proposed 2021 GPU and the CAP would support the minimization of energy consumption from operations associated with future development. VMT and building energy use associated with buildout of the project would be less than the VMT and building energy use associated with buildout of the existing 2006 General Plan. Therefore, the project would not result in a wasteful, inefficient or unnecessary consumption of energy resources.</p>	N/A	<b>Less than Significant</b>
<p>Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</p>	<p>Future development allowed under the project would implement applicable regulation that would ensure development would be energy efficient. The project would not conflict with or obstruct implementation of CALGreen and the California Energy Code, or with SCE and MVU's implementation of RPS, and impacts would be less than significant.</p>	N/A	<b>Less than Significant</b>
<b>4.7 Geology/Soils</b>			
<p>Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:</p> <ul style="list-style-type: none"> <li>• Rupture of a known earthquake fault,</li> <li>• Strong seismic ground shaking,</li> <li>• Seismic-related ground failure, including liquefaction,</li> <li>• Landslides?</li> </ul>	<p>Future development would be required to adhere to GPU Safety Element policies and Title 8, Chapter 8.21 Grading Regulations of the Municipal Code to ensure the safety of future land uses throughout the Planning Area, thereby minimizing potential adverse impacts. Engineering geologic reports are required for all developments on hillside sites where geologic conditions are considered to have a substantial effect on existing and/or future site stability. Future development would be required to comply with GPU Safety Element policies and Municipal Code requirements for geologic reports, which would ensure that impacts related to faults, seismic ground shaking, ground failure and landslides would be less than significant.</p>	N/A	<b>Less than Significant</b>
<p>Would the project result in substantial soil erosion or the loss of topsoil?</p>	<p>Future development would incorporate long-term water quality controls pursuant to storm water standards including the National Pollutant Discharge Elimination System (NPDES) Municipal Permit requirements. Municipal Code requirements (Title 8, Chapter 8.10 Stormwater/urban Runoff Management and Discharge Controls and Title 9, Chapter 9.17 Landscape and Water Efficiency Requirements) provides additional guidance for storm water management, erosion control and slope planting. Implementation of these regulations would ensure that future development would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.</p>	N/A	<b>Less than Significant</b>

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Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
Would the project 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?	Future development would be required to adhere to GPU Safety Element policies and Title 8, Chapter 8.21 Grading Regulations of the Municipal Code to ensure the safety of future land uses throughout the Planning Area, thereby minimizing potential adverse impacts. Engineering geologic reports are required for all developments on hillside sites where geologic conditions are considered to have a substantial effect on existing and/or future site stability. Future development would be required to comply with GPU Safety Element policies and Municipal Code requirements for geologic reports, which would ensure that impacts related to unstable geological units would be less than significant.	N/A	<b>Less than Significant</b>
Would the project 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?	Implementation of applicable building code regulations, Title 8, Chapter 8.21 Grading Regulations of the Municipal Code which requires a geotechnical investigation, in addition to other regulations and General Plan policies would ensure impacts related to expansive soils would not create a risk to life or property. Impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Construction-related ground-disturbing activities associated with future development could result in significant impacts (loss) of nonrenewable paleontological resources. Because site-specific details and locations of future development projects are not known at this program-level of analysis, impacts to paleontological resources would be potentially significant.	<b>PAL-1:</b> Applications for future development, wherein the Community Development Director or his or her designee has determined a potential for impacts to paleontological resources, shall review the underlying geology and paleontological sensitivity of the site. If it is determined that the potential exists that sensitive paleontological resources are present, the applicant shall be required to comply with the following mitigation framework.  A qualified paleontological monitor shall be present during grading in project areas where a project specific geological technical study has determined that such monitoring is necessary due to the potential for paleontological resources to reside within the underlying geologic formations. The geologic technical study shall also provide specific duties of the monitor, and detailed measures to address fossil remains, if found.	<b>Less than Significant with Mitigation Incorporated</b>
<b>4.8 Greenhouse Gas Emissions</b>			
Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.	The proposed CAP identifies strategies, measures, and actions that would be implemented to reduce GHG emissions consistent with State legislative requirements. Therefore, with the adoption and implementation of the proposed CAP, GHG emissions generated by the 2021 GPU would be reduced to meet State GHG reduction targets. Therefore, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs.	The proposed CAP identifies strategies, measures, and actions that would be implemented to reduce GHG emissions consistent with State legislative requirements. Therefore, with the adoption and implementation of the proposed CAP, GHG emissions generated by the 2021 GPU would be reduced to meet State GHG reduction targets. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
<b>4.9 Hazards &amp; Hazardous Materials</b>			
Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Adherence with applicable federal, state, regional, and local plans and regulations, as well as 2021 GPU policies would ensure that the project would not result in potential hazards associated with the use, transport, storage, and sale of hazardous materials, and impacts would be less than significant.	N/A	<b>Less than Significant</b>

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Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
Would the project 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.	Adherence with applicable federal, state, regional, and local plans and regulations, as well as 2021 GPU policies would ensure that the project would not result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Adherence with applicable federal, state, regional, and local plans and regulations, as well as 2021 GPU policies, would ensure that the project would not result in an accidental release of hazardous materials or emissions of hazardous substance near existing or proposed schools, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.	Adherence to applicable clean-up and/or remediation requirements and regulations would ensure that the project would not create a significant hazard associated with known hazardous materials sites, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project be 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, result in a safety hazard or excessive noise for people residing or working in the project area.	Development within the AICUZ is subject to development standards and restrictions as set forth in Municipal Code Section 9.07.060. Future development that would be located within the city's special zone and/or within the ALUC compatibility zones would be required to adhere to all special regulations, including Municipal Code development standards and specific land use regulations regarding FAA notification imaginary surfaces, aircraft noise, and building heights. Consequently, the project would be consistent with adopted ALUCPs, as future development would be required to show compatibility with the requirements of the ALUCPs, the Municipal Code, and associated FAA requirements. Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the project area, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Adherence to applicable LHMP standards and 2021 GPU Safety Element policies, as well as increased traffic capacity in the proposed roadway network, would ensure that the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	Compliance with MVFD regulations and 2021 GPU policies would ensure that project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
<b>4.10 Hydrology/Water Quality</b>			
Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	<p>Construction</p> <p>adherence to relevant plans and programs, as well as Municipal Code requirements would ensure that future development would not violate any water quality standards or degrade surface or ground water quality, and construction-related impacts would be less than significant.</p> <p>Post-Development</p> <p>Adherence to relevant plans and programs, including the IGP, as well as Municipal Code requirements for preparation of a WQMP and applicable GPU policies, would ensure that future development would not violate any water quality standards or</p>	N/A	<b>Less than Significant</b>

**Table S-1  
Summary of Environmental Impacts**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
	degrade surface or ground water quality, and long-term operational impacts would be less than significant.		
Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	The project has been designed to minimize the increase in impervious surfaces by primarily focusing on future development and redevelopment within the proposed Concept Areas that consist of clusters of vacant and underutilized land within the city limit that would allow for continued groundwater recharge in substantial portions of the Planning Area. Additionally, adherence to applicable GPU policies would ensure that future development would neither substantially deplete groundwater supplies nor interfere substantially with groundwater recharge, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project 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 a substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; 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; or iv) impede or redirect flood flows.	<p>Erosion or Siltation</p> <p>Adherence to Municipal Code requirements and applicable GPU goals and policies would ensure that future development would not result in a substantial erosion or siltation on- or off-site, and impacts would be less than significant.</p> <p>Increase Surface Runoff</p> <p>Pursuant to the SAR WQMP, some future development may be required to include BMPs to reduce flow velocity of storm water runoff. Such BMPs could include on-site drainage swales, bioretention features, use of permeable pavers in parking areas and streets, or infiltration basins which also serve as a means for pollutant removal. Additionally, applicable Priority Development Projects would be required to include LID BMPS to treat potentially polluted runoff prior to entering the public storm drain system. Project-specific studies would be required to ensure that volume-based treatment LID BMPs are properly sized to infiltrate, filter, or treat the remaining portion of the runoff volume that was not retained or treated by other BMPs. Furthermore, adherence to Municipal Code requirements and applicable GPU goals and policies would ensure that future development would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, and impacts would be less than significant.</p> <p>Exceed Capacity of Stormwater System</p> <p>Future development would be required to comply with future SWPPPs and the project-specific WQMP, which would identify BMPs to be incorporated into development plans to ensure that near-term construction activities and long-term post-development activities would not result in substantial amounts of polluted runoff. Therefore, adherence to regional and local plans and regulations would ensure that future development would not create or contribute substantial additional sources of polluted runoff that would exceed the capacity of existing or planned stormwater drainage systems, and impacts would be less than significant.</p> <p>Flood Flows</p> <p>Future development would be required to adhere to regional and local plans, programs and regulations relating to storm water runoff and volume flow. All future development would include BMPs to manage polluted runoff and minimize flow volume and velocity. Therefore, adherence to Municipal Code requirements and applicable GPU goals and policies would ensure that future development would not substantially impede or redirect flood flows, and impacts would be less than significant.</p>	N/A	<b>Less than Significant</b>

**Table S-1  
Summary of Environmental Impacts**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation.	The Pacific Ocean is located more than 40 miles from the city. Therefore, there is no potential for tsunamis to impact the Planning Area. Future development would be required to comply with Municipal Code Chapter 8.12, Floodplain Ordinance, which requires flood safe measures be included in development plans. Remediation measures for Perris Dam described above would also serve to protect against a seiche. Therefore, impacts associated with flooding due to dam failure and seiche would be less than significant.	N/A	<b>Less than Significant</b>
Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	<p>future development would be required to comply with the SAR Basin Water Quality Control Program, which includes the requirement to complete and submit of a SWPPP for construction-related activities. Future development would also be required to implement a WQMP to demonstrate compliance with the City's MS4 permit and to minimize the release of potential waterborne pollutants. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan, and impacts would be less than significant.</p> <p>Domestic water supplies throughout the Planning Area are not reliant on groundwater as a primary source. Furthermore, the OSRC Element includes the goals to preserve and protect natural resources, and policies are identified to ensure groundwater protection and improve groundwater infiltration measures. Therefore, the project would not conflict with or obstruct implementation of a groundwater management plan, and impacts would be less than significant.</p>	N/A	<b>Less than Significant</b>
<b>4.11 Land Use and Planning</b>			
Would the project physically divide an established community.	Implementation of the project would not include new major infrastructure, such as a freeway, that could physically divide an established community. The changes envisioned with the land use plan and supporting policies are designed to increase community connections. Therefore, the project would not physically divide the community, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	The project would implement various City planning initiatives, identifies housing sites necessary to meet RHNA goals and ensure consistency with the state housing targets, and would facilitate implementation of the CAP. Furthermore, the project would not generate growth that would exceed 2040 SCAG projections. Therefore, the project would not cause a significant environmental impact due to a conflict with any applicable plans, policies, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
<b>4.12 Mineral Resources</b>			
Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the stat?	The majority of land within the Planning Area is designated as MRZ-3, land for which the significance of mineral resources cannot be determined, or MRZ-1, land for which adequate geologic information indicates that no significant mineral deposits are present. Neither of these MRZ categories are considered significant mineral resources. The small amount of land designated as MRZ-2, areas underlain by mineral deposits where geologic data indicates that significant measured or indicated mineral resources are present, is not located within any of the proposed Concept Areas. Furthermore, this area is not currently used for mineral resource extraction. Therefore, the project would not result in the loss of availability of regionally valuable mineral resources, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project 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?	There are no active mineral resource extraction facilities within the Planning Area. The existing 2006 General Plan land use map, as well as the proposed GPU land use map do not delineate any mineral resource recovery sites, or designate any land for mineral resource production. Therefore, implementation of the project would not result in the loss of a designated mineral recovery site and no impact would occur.	N/A	<b>No Impact</b>

**Table S-1  
Summary of Environmental Impacts**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
<p>4.13 Noise</p> <p>Would the project generate 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>	<p><b>Traffic Noise</b></p> <p>Increase in Ambient Noise: The increase in ambient noise levels adjacent to roadway segments listed in Section 4.13.5.1 would expose existing noise-sensitive receptors to a significant increase in ambient noise levels, and impacts would be significant.</p> <p>Land Use Compatibility: Future development proposals within the Planning Area would be required to conduct site-specific exterior and interior noise analyses to demonstrate that the proposed development would not place sensitive receptors in locations where the existing or future noise levels would exceed the land use compatibility standards. Impacts associated with future development would be less than significant.</p> <p><b>Railroad Noise</b></p> <p>Railroad noise levels would not exceed 60 CNEL within the Planning Area, and impacts would be less than significant.</p> <p><b>Stationary Noise</b></p> <p>Through enforcement of the Noise Regulation of the Municipal Code and 2021 GPU policies and actions, impacts associated with stationary sources of noise would be less than significant.</p> <p><b>Construction Noise</b></p> <p>Construction activities associated with any individual development may occur near noise-sensitive receptors and noise disturbances may occur. Therefore, construction noise impacts would be considered potentially significant.</p>	<p><b>Traffic Noise</b></p> <p>Impacts associated with the increase in ambient noise would be significant without mitigation. For existing noise sensitive land uses, possible noise-reduction measures would include retrofitting older structures with acoustically rated windows and doors featuring higher Sound Transmission Class ratings, which is a measure of exterior noise reduction performance. However, there is no mechanism in place for implementing such a retrofit program. Because the significant noise impacts would be to existing homes and other noise-sensitive uses in an already urbanized area, there is no feasible mitigation. Therefore, impacts to existing sensitive land uses would remain significant and unavoidable.</p> <p><b>Construction Noise</b></p> <p><b>NOS-1:</b> The Director of Community Development or his or her designee shall require applicants to demonstrate whether the project has the potential to exceed noise standards contained in Sections 8.14.040(E) and 11.80.030(D)(7) of the Municipal Code. If a project may exceed standards or is located adjacent to sensitive receptors, the City may require the applicant to prepare a Noise Analysis that estimates construction noise and identifies noise reduction measures that would ensure compliance with Municipal Code standards. Construction plans submitted to the City shall identify applicable measures on demolition, grading, and construction plans submitted to the City. Noise reduction measures can include, but are not limited to, the following:</p> <ol style="list-style-type: none"> <li>1. Demolition, construction, site preparation, and related activities that would generate noise perceptible at the property line of the subject property are limited to the hours between 7:00 a.m. to 7:00 p.m. from Monday through Friday excluding holidays and from 8:00 a.m. to 4:00 p.m. on Saturdays. The building inspector may issue an exception to this limitation on hours in cases of urgent necessity where the public health and safety will not be substantially impaired.</li> <li>2. Idling times for noise-generating equipment used in demolition, construction, site preparation, and related activities shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes.</li> <li>3. Demolition, construction, site preparation, and related activities within 70 feet from the edge of properties with existing, occupied noise-sensitive uses shall incorporate all feasible strategies to reduce noise exposure for noise-sensitive uses, including:             <ol style="list-style-type: none"> <li>a. Provide written notice to all known occupied noise-sensitive uses within 400 feet of the edge of the project site boundary at least 2 weeks prior to the start of each construction phase of the construction schedule;</li> <li>b. Ensure that construction equipment is properly maintained and equipped with noise control components, such as mufflers, in accordance with manufacturers' specifications;</li> </ol> </li> </ol>	<p><b>Traffic Noise - Significant and Unavoidable</b></p> <p><b>Construction Noise - Significant and Unavoidable</b></p> <p>Mitigation Measure NOS-1 would reduce construction noise exposure. However, for construction sites that are adjacent to noise-sensitive uses, there still could be a substantial temporary increase in noise levels that could lead to adverse noise-related impacts. Therefore, impacts would remain significant and unavoidable.</p>



**Table S-1  
Summary of Environmental Impacts**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
		<ul style="list-style-type: none"> <li>c. Re-route construction equipment away from adjacent noise-sensitive uses;</li> <li>d. Locate noisy construction equipment away from surrounding noise-sensitive uses;</li> <li>e. Use sound aprons or temporary noise enclosures around noise-generating equipment;</li> <li>f. Position storage of waste materials, earth, and other supplies in a manner that will function as a noise barrier for surrounding noise-sensitive uses;</li> <li>g. Use the quietest practical type of equipment;</li> <li>h. Use electric powered equipment instead of diesel or gasoline engine powered equipment; Use shrouding or shielding and intake and exhaust silencers/mufflers; and</li> <li>i. Other effective and feasible strategies to reduce construction noise exposure for surrounding noise-sensitive uses.</li> </ul> <p>4. For construction of buildings that require the installation of piles, an alternative to installation of piles by hammering shall be used. This could include the use of augured holes for cast-in-place piles, installation through vibration or hydraulic insertion, or another low-noise technique.</p>	
<p>Would the project generate excessive groundborne vibration or groundborne noise levels?</p>	<p>Construction details, locations, and equipment for future project-level developments under the 2021 GPU are not known at this time but may cause vibration impacts. Therefore, construction vibration impacts would be considered potentially significant. Vibration impacts due to railroad activities and stationary source would be less than significant.</p>	<p><b>NOS-2:</b> Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving and static rollers as opposed to vibratory rollers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.</p>	<p><b>Less than Significant with Mitigation Incorporated</b></p>
<p>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?</p>	<p>Adherence with the noise requirements of the ALUCP, the Municipal Code, and associated FAA requirements would ensure that future development would not expose people to excessive aircraft noise levels, and impacts would be less than significant.</p>	<p>N/A</p>	<p><b>Less than Significant</b></p>

**Table S-1  
Summary of Environmental Impacts**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
<b>4.14 Population/Housing</b>			
Would the project 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 roads or other infrastructure)?	The project would exceed the state RHNA requirements, would reduce future population and household growth compared to 2040 SCAG projections, and would locate future infrastructure along major transit corridors that are already served by essential roads, utilities, and public services. Therefore, the project would not induce substantial unplanned population growth, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	The project would exceed the state RHNA requirements, which would provide additional housing that would accommodate residents displaced by future redevelopment projects, and ensure no net loss of housing. Furthermore, the project would result in a reduction of future population and household growth compared to 2040 SCAG projections. Therefore, the project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
<b>4.15 Public Services and Recreation</b>			
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: <ul style="list-style-type: none"> <li>• Fire Protection;</li> <li>• Police Protection;</li> <li>• Schools;</li> <li>• Parks/Recreational Facilities</li> <li>• Other Public Facilities?</li> </ul>	<p><b>Fire Protection</b></p> <p>Future fire protection facilities would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment, and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the provision of new or physically altered fire protection facilities to a level less than significant.</p> <p><b>Police Protection</b></p> <p>Future police protection facilities would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment, and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the provision of new or physically altered police facilities to a level less than significant.</p> <p><b>Schools</b></p> <p>Future schools would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment, and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the provision of new or physically altered schools to a level less than significant.</p> <p><b>Other Public Facilities</b></p> <p>Future libraries would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment, and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the provision of new or physically altered libraries to a level less than significant.</p>	N/A	<b>Less than Significant</b>
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?	Future parks would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment, and the programmatic mitigation framework established in this EIR. Therefore, the project would develop future park facilities that would compensate that would address substantial increase in the use of parks that would occur under project buildout.	N/A	<b>Less than Significant</b>

**Table S-1  
Summary of Environmental Impacts**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Implementation of the mitigation framework established in this EIR would reduce impacts associated with the provision of new or physically altered parks to a level less than significant.	N/A	<b>Less than Significant</b>
<b>4.16 Transportation</b>			
Would the project conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	The project would implement roadway and circulation improvements, new bicycle and pedestrian facilities, as well as the polices and actions listed under goals C-1 through C-3 in order to improve the circulation network through project buildout in 2040. Therefore, the project would not conflict with a plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Compared to the existing 2006 General Plan, implementation of the project would result in lower VMT using several metrics, demonstrating a land use plan that would increase per capita VMT efficiency. However, some metrics showed an increase in VMT based on several metrics (shown in bold in Table 4.16-5). As a result of some metrics that exceeded the significance criteria based on certain analysis methodologist, impacts would be significant. The project includes TDM goals, policies, and actions that would support VMT reductions; however, anticipated VMT reductions associated with proposed TDM measures would be large enough to guarantee that significant impacts could be fully mitigated. Therefore, projected VMT generated under buildout of the project would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This would be considered a significant impact.	The project has incorporated VMT reducing goals and policies to the extent feasible. No additional mitigation was identified that could reduce VMT impacts. Therefore, impacts would remain significant and unavoidable.	<b>Significant and Unavoidable</b>
Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	The 2021 GPU includes policies and actions described above that would ensure future transportation facilities would not introduce hazards onto the circulation network, and future development and redevelopment would also be designed consistent with all safety requirements pertaining ingress and egress onto the circulation network. Therefore, the project would not substantially increase hazards, and impacts would be less than significant.	N/A	<b>Less Than Significant</b>
Would the project result in inadequate emergency access?	Adherence to applicable LHMP standards and 2021 GPU Safety Element policies, as well as increased traffic capacity in the proposed roadway network, would ensure that the project would not result in inadequate emergency access, and impacts would be less than significant.	N/A	<b>Less than Significant</b>
<b>4.17 Utilities/Service Systems</b>			
Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<p><b>Water</b></p> <p>Future water facilities would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the relocation or construction of new or expanded water facilities to a level less than significant.</p> <p><b>Wastewater</b></p> <p>Future wastewater facilities would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the relocation or construction of new or expanded wastewater facilities to a level less than significant.</p>	N/A	<b>Less than Significant</b>

**Table S-1  
Summary of Environmental Impacts**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
	<p>Stormwater</p> <p>Future stormwater facilities would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the relocation or construction of new or expanded stormwater facilities to a level less than significant.</p> <p>Electric Power, Natural Gas, and Telecommunications</p> <p>Future facilities would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the relocation or construction of new or expanded electrical, natural gas, and telecommunications facilities to a level less than significant.</p>		
<p>Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?</p>	<p>The project would not exceed forecasted water demand projections for EMWD or BSMWC, because it would reduce future population and household growth compared to 2040 SCAG projections. Therefore, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years, and impacts would be less than significant.</p>	<p>N/A</p>	<p><b>Less than Significant</b></p>
<p>Would the project 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>	<p>The project would not exceed forecasted wastewater demand projections for EMWD or ECSD, because it would reduce future population and household growth compared to 2040 SCAG projections. Therefore, EMWD and ECSD would have adequate capacity to provide wastewater treatment for the project, and impacts would be less than significant.</p>	<p>N/A</p>	<p><b>Less than Significant</b></p>
<p>Would the project 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>	<p>The project would not generate excessive solid waste that would exceed regional forecasted demand, because it would reduce future population and household growth compared to 2040 SCAG projections. Therefore, the project would not generate solid waste in excess of state or local standards, exceed the capacity of local infrastructure, and impacts would be less than significant.</p>	<p>N/A</p>	<p><b>Less than Significant</b></p>
<p>Would the project comply with federal, state, or local management and reduction statutes and regulations related to solid waste?</p>	<p>Future site-specific development under the project would be required to complete a Waste Management and Recycling Plan and a Diversion Plan, which would ensure consistency with local, state, and federal requirements regarding waste diversion. Therefore, the project would not conflict with federal, state, or local management and reduction statutes and regulations related to solid waste, and impacts would be less than significant.</p>	<p>N/A</p>	<p><b>Less than Significant</b></p>
<b>4.18 Wildfire</b>			
<p>Would the project Substantially impair an adopted emergency response plan or emergency evacuation plan?</p>	<p>Future projects developed under the GPU would be designed in a manner that would not obstruct evacuation routes documented in the City's LHMP and would be required to adhere to the Municipal Code requirements and policies included in the GPU Safety Element that address disaster response and emergency evacuation. Compliance with Municipal Code regulations and local disaster prevention plans, as well as conformance with GPU policies, would ensure that the project would not impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.</p>	<p>N/A</p>	<p><b>Less than Significant</b></p>

**Table S-1  
Summary of Environmental Impacts**

Threshold	Impact Discussion	Mitigation Measure	Significance After Mitigation
Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Compliance with Municipal Code regulations and local disaster prevention plans, as well as conformance with GPU policies, would ensure that the project would not result in the exacerbation of wildfire risk, nor increase the risk of exposure to pollutant concentrations associated with wildfire, and impacts related to pollutant concentrations from a wildfire would be less than significant.	N/A	<b>Less than Significant</b>
Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	The Planning Area is served by major roadways and located within existing built environments that are served by storm water, sewer, electricity, potable water distribution, and communications systems infrastructure.	N/A	<b>Less than Significant</b>
Would the project 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?	As the project focuses development within the existing developed areas of the City, the potential exposure of people or structures to flooding or landslides from post-fire slope instability would not increase due to project implementation. Therefore, the project would not increase risk associated with post-fire flooding or landslides, and impacts would be less than significant.	N/A	<b>Less than Significant</b>



# Chapter 1

## Introduction

### 1.1 Type of EIR

Consistent with Section 15168 of the California Environmental Quality Act (CEQA) Guidelines, this Draft Environmental Impact Report (EIR) provides a programmatic analysis of the environmental impacts associated with implementation of the goals, policies, actions, and projected buildout of the following three planning documents:

- 2021 General Plan Update (GPU)
- 2021-2029 Housing Element Update
- Climate Action Plan (CAP)

These three separate planning documents are collectively referred to as the MoVal 2040 Project (project).

As described in Section 15168 of the CEQA Guidelines, program-level environmental review documents are appropriate when a project consists of a series of actions related to the issuance of rules, regulations, and other planning criteria. The project which is the subject of this EIR consists of long-term plans that will be implemented as policy documents guiding future development activities and related City of Moreno Valley (City) actions. The purpose of this program-level EIR is intended to inform decision-makers and the general public of the potential significant environmental impacts of the project. This program-level EIR also considers the availability of mitigation measures to minimize the project's significant impacts and evaluates reasonable alternatives to the project that may reduce or avoid one or more significant environmental effects.

## **1.2 List of Project Approvals**

The project would require Planning Commission and City Council approval of the following three project components:

- 2021 GPU
- 2021-2029 Housing Element Update
- CAP

## **1.3 Statement of Legal Authority**

The City of Moreno Valley is the Lead Agency for the project pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The Lead Agency, as defined by CEQA Guidelines Section 15367, is the public agency which has the principal responsibility and authority for carrying out or approving a project. The analysis and findings in this document reflect the independent, impartial conclusions of the City.

## **1.4 Responsible/Trustee Agencies**

State law requires that all EIRs be reviewed by Responsible and Trustee Agencies. A Responsible Agency, defined pursuant to CEQA Guidelines Section 15381, includes all public agencies other than the Lead Agency which have discretionary approval power over the project. A Trustee Agency is defined in Section 15386 of the CEQA Guidelines as a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the state of California. Implementation of the project would require subsequent actions or consultation from Responsible or Trustee Agencies. A brief description of some of the primary Responsible or Trustee Agencies that may have an interest in the project is provided below.

### **1.4.1 U.S. Army Corps of Engineers**

The United States Army Corps of Engineers (USACE) has jurisdiction over development in or affecting the navigable waters of the United States. All permits issued by the USACE are subject to consultation and/or review by the United States Fish and Wildlife Service (USFWS) and the United States Environmental Protection Agency (U.S. EPA). Streambeds and drainages occurring in the Planning Area may contain wetlands, which may be classified as jurisdictional waters of the United States. No permits from USACE are required at this time; however, future development that could occur with implementation of the project and associated discretionary actions may require review and/or USACE permits in the future.

### **1.4.2 California Department of Transportation**

Two California Department of Transportation (Caltrans) facilities are located within or adjacent to the Planning Area. State Route 60 (SR-60) traverses the northern portion of the city (east and west direction) and Interstates 215 (I-215) runs in proximity to the westerly

city limits (north and south direction). No permits from Caltrans are required at this time; however, Caltrans approval would be required for any encroachments or construction of facilities in a Caltrans right-of-way associated with future development within the Planning Area.

### **1.4.3 California Department of Fish and Wildlife**

An Agreement Regarding Proposed Stream or Lake Alteration (Streambed Alteration Agreement) with an agency or private party proposing to alter the bed, banks, or floor of any watercourse/stream, is under the authority of the California Department of Fish and Wildlife (CDFW) pursuant to Section 1600 et seq. of the State Fish and Game Code. The purpose of code Sections 1600-1616 is to protect and conserve fish and wildlife resources that could be substantially adversely affected by a substantial diversion or obstruction of natural flow of, or substantial change or use of material from the bed, bank, or channel of, any river, stream, or lake. Streambeds and other drainages occurring within the Planning Area may contain wetlands. No permits from CDFW are required at this time; however, future development that could occur with implementation of the project and associated discretionary actions may require review and/or Streambed Alteration Agreements in the future.

### **1.4.4 California Regional Water Quality Control Board (RWQCB) - Santa Ana Region (SAR)**

The California Regional Water Quality Control Board (RWQCB) - Santa Ana Region (SAR) regulates water quality through the Federal Clean Water Act Section 401 certification process and oversees the National Pollutant Discharge Elimination System (NPDES), to protect water resources and control pollutants in runoff. The RWQCB is responsible for implementing permitting, compliance, and other activities to reduce pollutants in municipal, construction, and industrial storm water runoff, including overseeing the Municipal Separate Storm Sewer System (MS4) Permit (R8-2010-0033). No permits from RWQCB are required at this time; however, future development that could occur with implementation of the project and associated discretionary actions may require review and/or Section 401 certifications.

### **1.4.5 Riverside County Airport Land Use Commission**

The Riverside County Airport Land Use Commission (ALUC) assists local agencies by ensuring the development of compatible land uses in the vicinity of existing airports. Beginning in 2004, the Riverside County ALUC began adopting new versions of the airport land use compatibility plan (ALUCPs) for most Riverside County airports that are contained within a single, countywide document entitled Riverside County ALUCP. As a Responsible Agency, the Riverside County ALUC would review future development proposals within the Planning Area if applicable, and make “consistency determinations” with the provisions and policies set forth in the March Air Reserve Base/Inland Port Airport (MARB/IPA) Land Use Compatibility Plan.



## 1.5 Scope of EIR

The Notice of Preparation (NOP) was circulated on March 9, 2020, and a scoping meeting was held on Saturday, March 14, 2020 at the City Hall – Council Chambers, located on 14177 Frederick Street, Moreno Valley, California. The NOP circulated for analysis of the project, related letters received, and comments made during the scoping meeting are included as Appendix A of this EIR. The Draft EIR was circulated for public review for a period commencing April 2 through May 17 (Public Review Period). The Draft EIR and all related appendices have been made available for public review and inspection during the Public Review Period at City Hall, located on 14177 Frederick Street, Moreno Valley, California, and on the Community Development Department’s Current Projects webpage at:

<http://www.moreno-valley.ca.us/cdd/documents/about-projects.html>

Copies of the Notice of Availability of the Draft EIR were also available at the City’s three public library branches at the following locations:

- Main Branch, located at 25480 Alessandro Boulevard
- Mall Branch located at 22500 Town Circle
- Iris Plaza Branch located at 16170 Perris Boulevard

A brief overview of each EIR chapter is provided below:

**Executive Summary:** Summarizes the EIR by providing an overview of the project, analysis of the potentially significant environmental impacts that could result from the project, a list of mitigation measures identified to reduce or avoid such impacts, a review of the alternatives to the project, including the identification of an environmentally superior alternative to the project.

**1.0 Introduction:** Provides an overview of the applicable legal authority, introduces the purpose for the EIR and explains the EIR process and the intended uses of the EIR.

**2.0 Environmental Setting:** Provides a description of the project’s regional context, location, and existing physical characteristics and land use within the Planning Area. More detailed descriptions of the environmental context pertaining to specific environmental topics are provided in each section of Chapter 4: Environmental Analysis.

**3.0 Project Description:** Provides a detailed description of the project, including the purpose and objectives of the project and descriptions of each component of the project (2021 GPU, Housing Element Update, and CAP).

**4.0 Environmental Analysis.** Analyzes the environmental impacts of the project. Impacts are organized by the following topic areas:

- 4.1 Aesthetics
- 4.2 Agriculture and Forestry Resources
- 4.3 Air Quality
- 4.4 Biological Resources
- 4.5 Cultural and Tribal Cultural Resources
- 4.6 Energy
- 4.7 Geology/Soils
- 4.8 Greenhouse Gas Emissions
- 4.9 Hazards & Hazardous Materials
- 4.10 Hydrology/Water Quality
- 4.11 Land Use/Planning
- 4.12 Mineral Resources
- 4.13 Noise
- 4.14 Population/Housing
- 4.15 Public Services and Recreation
- 4.16 Transportation
- 4.17 Utilities/Service Systems
- 4.18 Wildfire

Each topic area respectively provides a contextual description of the project's environmental setting, significance criteria, methodology, and potential impacts.

**5.0 CEQA Mandated Analysis:** Summarizes the project's significant and unavoidable environmental impacts, significant irreversible environmental changes, and growth-inducing impacts.

**6.0 Project Alternatives:** This chapter presents a reasonable range of alternatives to the project and includes the following:

- A discussion of the environmental impacts associated with each alternative
- A comparison of the relative impacts of each alternative to those of the project
- A discussion of the relationship of each alternative to the project's objectives, and
- Identification of the environmentally superior alternative.

**7.0 EIR References:** Lists documents and other information sources relied upon in the preparation of the EIR and identifies the persons and organizations that contributed to the preparation of the EIR.

## 1.6 Incorporation by Reference

Consistent with CEQA Guidelines Section 15150, this Draft EIR incorporates the following documents by reference:

- World Logistics Center Specific Plan (Adopted August 25, 2015)
- World Logistics Center Specific Plan Revised Final EIR, April 2020 (State Clearinghouse No. 2012021045)

Where portions of the documents are relevant to the analysis in this EIR, the incorporated part of the referenced documents is briefly summarized. In compliance with CEQA Guidelines Section 15150, the documents listed are available to the public at the City of Moreno Valley Community Development Department.



## Chapter 2

# Environmental Setting

## 2.1 Planning Context

### 2.1.1 Project Location

The city of Moreno Valley (city) is located within the northwestern portion of Riverside County in the southern Inland Empire portion of the state of California. Moreno Valley is located approximately 63 miles east of downtown Los Angeles, 49 miles east of the city of Irvine, and 43 miles west of the city of Palm Springs. State Route 60 (SR-60), which runs in an east and west direction through the northern portion of Moreno Valley (east and west direction), and Interstate 215 (I-215), which runs in proximity to the westerly city limits (north and south direction), serve to connect the city to other communities throughout the southern California region. The city is accessible via public transportation by rail, through Metrolink located approximately one-half mile west of the city limits, and the city is accessible via aircraft at the Inland Port Airport located at the March Air Reserve Base (MARB), which is situated south and west of the city limits.

The city's picturesque valley setting is bounded to the north by the Box Springs Mountains, the Badlands to the east, and the mountains of the Lake Perris Recreation Area, Mystic Lake floodplain, and San Jacinto Wildlife Area to the south. The city is also bounded by MARB to the southwest and the city of Riverside to the west.

Moreno Valley is a diverse and growing community of approximately 207,000 people. It has a relatively young and dynamic majority Latino population. The city has seen significant employment growth in recent years, having created 20,000 new jobs locally since 2013. The city is currently home to approximately 4,500 businesses, including many Fortune 500 and international companies such as Amazon, Proctor & Gamble, Skechers USA, and Karma Automotive. Other important institutions established in the city include the Riverside University Health System Medical Center, a public teaching hospital, the Kaiser Permanente Hospital, and Moreno Valley College. Figure 2-1 presents Moreno Valley's regional location.



Figure 2-2 presents the Planning Area, which includes land within the city limits and Moreno Valley's Sphere of Influence (SOI). The SOI is a plan for the probably physical boundaries and service area of the city. It encompasses the territory that is envisioned to be added to the city's ultimate service area through annexation. The Riverside Local Agency Formation Commission (LAFCO) is vested with the authority to review and approve (or deny) any amendment to the city's SOI and annexations of new territory. In total, the Planning Area comprises a total of approximately 42,900 acres (67 square miles) of both incorporated and unincorporated land bearing relation to the city's future growth. The existing city limits encompass approximately 33,000 acres (51.6 square miles) of incorporated land, or 77 percent of the Planning Area. Existing development within the city limits include residential, commercial, and industrial developments, as well as public/community facilities, including parks, schools, utilities, church/religious facilities, and hospitals/care facilities. The city's SOI boundary incorporates a total of approximately 9,920 acres outside of the city limits (15.5 square miles) or 23 percent of the total land located in the Planning Area. The Planning Area for the Housing Element Update and the CAP, unless otherwise noted, is limited to the area within the city's current territorial boundaries.

Today, Moreno Valley is a community of approximately 208,000 residents (United States Census 2019), and the city's motto is "People, Pride, Progress." Among California's growing cities, Moreno Valley is the second most populous in Riverside County and growth can be attributed to the diverse range of quality housing options, which include higher-end executive homes, affordable single-family homes, condominiums, and apartments; a family-friendly lifestyle; good schools; and impressive quality-of-life amenities and growing job centers. The demographic profile of Moreno Valley consists primarily of young families. The majority of the city's population identify themselves as Hispanic/Latino (of any race). The average age in the city is also relatively young, with nearly 30 percent of the population under 18 years of age.

## **2.1.2 Current Adopted Moreno Valley General Plan**

Adopted in 2006, the existing Moreno Valley General Plan provides goals, objectives, policies, and programs that serve as a guide to the development of the future character of the city. Acting as the "constitution" for the physical development of the city, the General Plan forms the basis of decisions concerning the development of property. The current, adopted General Plan includes all the mandated elements required by California State law in 2006: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. Certain mandatory elements are combined to minimize redundancy and an optional Economic Development Element was planned for but not completed. The existing 2006 General Plan is accompanied by a preamble that outlines the overall vision of development within Moreno Valley:

The City of Moreno Valley embraces the interests of its residents and strives to meet their needs by creating a sense of community. The commitment to this vision encourages attractive amenities and a full range of public services, while promoting a safe and healthy environment. It is the goal of the City to improve the quality of life by creating this "sense of place" and working together to encourage involvement and volunteerism while endeavoring to function in an effective, responsible, efficient and visionary manner.

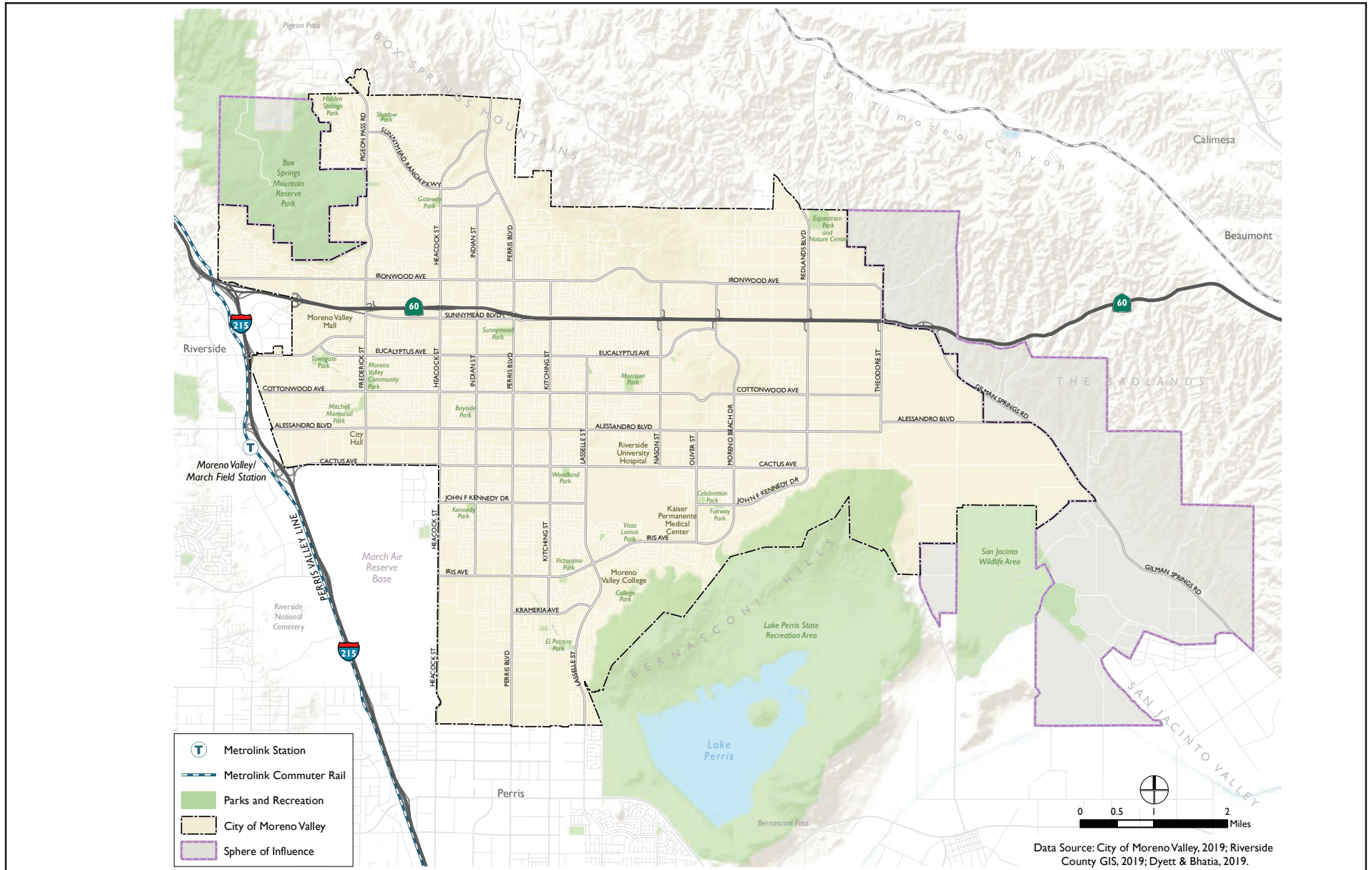


FIGURE 2-2  
Planning Area

In 2006, eight “ultimate goals” were identified for the existing General Plan, detailed below.

The ultimate goals of the General Plan are to achieve a community which . . .

1. Exhibits an orderly and balanced land use pattern that accommodates a range of residential, cultural, recreational, business and employment opportunities.
2. Is clean, attractive and free of blight and deteriorated conditions.
3. Provides public services and public facilities that are needed and desired by the community, including, but not limited to, a library(s) and library services.
4. Enjoys a healthy economic climate that benefits both residents and businesses.
5. Provides recreational amenities, recreation services and open space, including, but not limited to, parks, multi-use trails, community centers and open space.
6. Enjoys a circulation system that fosters traffic safety and the efficient movement of motor vehicles, bicycles and pedestrians.
7. Emphasizes public health and safety, including, but not limited to, police, fire, emergency and animal services and protection from floods and other hazards.
8. Recognizes the need to conserve natural resources while accommodating growth and development.

### **2.1.3 Prior Planning Initiatives**

Subsequent to the adoption of the existing 2006 General Plan, the City completed several major planning initiatives, which are summarized below.

#### **2.1.3.1 2014-21 Housing Element**

The Housing Element is a component of the General Plan which guides planning for housing to meet the current and projected needs of all households in the city. The Housing Element includes an assessment of housing needs and lays out goals, policies, and programs for the preservation, improvement, and development of housing to meet community needs. A critical part of the Housing Element is the inventory of housing opportunity sites and an analysis of the capacity of those sites to accommodate the City’s RHNA allocation as determined by the Southern California Association of Governments (SCAG).



In February 2014, the City adopted the Fifth Cycle Housing Element Update to cover the eight-year planning period from January 2014 through October 2021. Moreno Valley's RHNA allocation for the Fifth Cycle was 6,169 units of total new construction needed. Per the City's 2019 Annual Housing Element Progress Report, 332 moderate income level units (81-120 percent of area median income or AMI) and 1,363 above moderate income level units (more than 120 percent of AMI) have been built or permitted, for a grand total of 1,695 units at all RHNA income levels, which leaves a total of 4,474 units remaining under the City's RHNA allocation. The RHNA does not necessarily require development on any specific parcel, but rather allows communities to anticipate growth, so that collectively the community and the region can accommodate housing to meet the needs of all household income demographics in the community and the state.

### **2.1.3.2 World Logistics Center Specific Plan**

Adopted by the City in 2015, the World Logistics Center (WLC) Specific Plan covers 2,610 acres, which amounts to approximately 7.9 percent of land within the city limits. The WLC Specific Plan covers an area in the eastern portion of the city, bounded by SR-60 to the north, Cactus Avenue to the south, Redlands Boulevard to the west, and Gilman Springs Road to the east. The WLC Specific Plan envisions up to 40.6 million square feet of building area specifically designed to support the City's growing next generation of logistics and advanced manufacturing industries and related businesses. Approximately 2,383 acres (40.4 million square feet) are planned for Logistics Development (LD) and 37 acres (200,000 square feet) are planned for Light Logistics (LL), which also includes offices uses.

Development and occupancy of the WLC Specific Plan area is planned over a period of 15 years, from 2020 through 2035, although the actual development phasing and square footage buildout will be based on future market trends and conditions. The businesses within the WLC Specific Plan area are projected to create approximately 24,000 permanent new jobs within the city (20,307 direct jobs and 3,693 indirect jobs).

As of the compilation of this Draft EIR, although the WLC Specific Plan project has been approved by the City, no development has commenced due to pending legal proceedings, one of which challenges the June 2020 certification of the revised Final Environmental Impact Report prepared for the WLC Specific Plan and related entitlements.

### **2.1.3.3 Momentum MoVal Strategic Plan**

In 2016, the City adopted Momentum MoVal, the City's first Strategic Plan to guide the community's growth in a three- to five-year timeframe, commencing in 2016. The City's top priorities are grouped into six categories: Economic Development; Library; Public Safety; Infrastructure; Youth Programs; and Beautification, Community Engagement, and Quality of Life. Through the General Plan Update (GPU) process, the priorities identified in Momentum MoVal have been incorporated into the General Plan to guide the community's growth, with particular attention to land use, towards year 2040.

Momentum MoVal prioritizes the goal of establishing the city as an international model in logistics development while simultaneously promoting small business development and entrepreneurship. As such, Momentum MoVal determined that the quantity, location, and character of general/light industrial and commercial/office land uses would require consideration in the future planning documents. Furthermore, quality of life and community interaction can be enhanced through the creation of a downtown core that offers “Third Space” gathering opportunity outside of the workplace or home to encourage social exchange in a live, work, and play atmosphere.

### **2.1.3.4 Medical Centers Expansion**

The city has two major medical centers—the Riverside University Health System Medical Center and the Kaiser Permanente Moreno Valley Medical Center. Both medical centers have adopted and implemented expansion plans that have either been recently completed or are in-progress.

#### **a. Riverside University Health System Medical Center**

The approximately 80-acre Riverside University Health System Medical Center campus is located in the central portion of the city, bounded by Alessandro Boulevard to the north, Cactus Avenue to the south, Nason Street to the east, and Lasselle Street to the west. Expansion of the 439-bed medical center was completed in 2019. The expansion project occupies approximately 17.4 acres on the south side of the existing medical center campus, directly north of Cactus Avenue. The recently constructed expansion project includes a new 200,000-square-foot outpatient surgery center, imaging center, and a medical office building linked to the existing medical center.

#### **b. Kaiser Permanente Moreno Valley Medical Center**

The approximately 20-acre Kaiser Permanente Moreno Valley Medical Center campus is located in the south-central portion of the city, bounded by Cactus Avenue to the north, Iris Avenue to the south, Oliver Street to the east, and Nason Street to the west. About two-thirds of the campus is developed, including the existing 130,000-square-foot 100-bed hospital building, two medical office buildings totaling approximately 89,500 square feet, and a central utility plant.

In April 2020, the City certified an EIR and a Master Plot Plan to expand the existing medical center within the existing campus footprint. The approved expansion provides for the overall development and expansion of the existing hospital facility, consisting of 1,125,000 square feet of medical service facilities and ancillary uses to be constructed over three phases with a 20-year buildout. Phase 1, that began construction in 2020, would expand the diagnostic and treatment center at the existing hospital and construct a new energy center to contain all major mechanical equipment that would run the hospital facility. Phase 2 includes further expansion of the buildings from Phase 1 as well as the North and East Patient Bed Tower, Medical Office Building No. 3 construction, and parking structure improvements. Phase 3 includes expansion of the West and South Patient Bed Tower, construction of Medical Office

Building No. 4, and parking structure improvements. At ultimate project buildout, the state-of-the-art medical center campus would include an approximately 460-bed hospital, hospital support buildings, outpatient medical office buildings, an energy center, and surface/structured parking. Kaiser Permanente anticipates that the project would add approximately 4,000 new healthcare jobs.

### **2.1.3.5 Destination MoVal: Town Center**

In November 2019, the City took a major step in implementing Momentum MoVal with the release of a Request for Proposals entitled “Destination MoVal: Town Center” to transform an approximately 56-acre City-owned site near the center of the community. The site is located at the northwest corner of the intersection of Nason Street and Alessandro Boulevard, south of Cottonwood Avenue and east of Morrison Street. In October 2020, the City approved the sale of the site for development as a mixed-use master-planned Town Center, consisting of commercial, office, residential, and public uses. The project is a public-private partnership involving the City and the development firm, Lewis Acquisition Company.

The Moreno Valley Town Center is intended to provide the city with an attractive new downtown intended to be a destination for residents and visitors, alike. The project envisions commercial uses, including entertainment, hospitality, restaurants, shops, and offices; 300-700 luxury residential units; a section for a civic use, such as an innovation library/technology center; a police substation; public gathering places to host art displays and outdoor music and entertainment; and an area for a major public amenity that would attract more visitors and commerce to Moreno Valley. The project would be designed utilizing interconnected plazas, urban niches, landscaped open space, walkable streets, and high-quality architectural features. The project is currently in design; environmental review and entitlement processing for the Moreno Valley Town Center Project has not yet begun.

### **2.1.4 MoVal 2040 Process**

The MoVal 2040 Project (project) was initiated in late 2019 with a series of meetings involving City staff and a professional urban planning consultant (Dyett & Bhatia) retained by the City, and the launching of a website for the project ([www.MoVal.org/2040](http://www.MoVal.org/2040)). The MoVal 2040 process includes four main phases, described below.

- **Phase 1** focused on identifying issues and opportunities to address during the update of the General Plan and culminated in the preparation of a “Vision and Guiding Principles” that describe shared values within the city and its aspirations for the city’s future.
- **Phase 2** explored different options for achieving the Vision and Guiding Principles. Several different alternatives for land use and circulation were evaluated and a preferred concept was identified.
- **Phase 3** involved the creation of a draft 2021 GPU based on the approved vision and concept from prior phases and completion of the environmental review process. Stakeholder interviews with affordable housing developers and advocates were

concurrently conducted to gather critical information from interested parties necessary for preparing inform preparation of the Housing Element Update. Preparation of the CAP commenced with a meeting with City staff and Moreno Valley Electric Utility. In Phase 3, drafts of the 2021 GPU, 2021-29 Housing Element, and CAP were submitted for administrative review by City staff.

- **Phase 4** involves noticed public review of the draft documents and formal hearings before the Planning Commission and City Council prior to adoption of the project.

Phase 1 of the 2021 GPU focused on community outreach to identify the most important issues to address within the General Plan and to establish a vision for the future of Moreno Valley. This phase included stakeholder interviews, six “pop-up” outreach events, a community-wide online survey, as well as five community workshops (four in-person workshops including an EIR scoping meeting and one virtual workshop). This phase generated input from nearly 700 Moreno Valley community members. Another critical component of Phase 1 was formation of the General Plan Advisory Committee (GPAC). The GPAC served as an advisory body to the City Council and included representation from the perspective of residents, businesses, and other community stakeholders in the development of the 2021 GPU. This provided a public forum to ensure that a wide and diverse range of voices and interests were heard and considered in the process. Based on public input received by GPAC and staff recommendations, in February 2020, the City Council approved the Vision and Guiding Principles for the 2021 GPU.

Phase 2 focused on developing and exploring different land use, circulation, and design concepts for the 2021 GPU. These concepts were established based on input from community members and decision-makers, which provided different options by which the City could achieve the Vision and Guiding Principles. A second community-wide survey was conducted and multiple public meetings were held during this phase. The pros and cons of six different concepts were explored and refined with input from the community, GPAC, and Planning Commission. Between December 2019 and May 2020, close to 1,000 community members participated in the 2021 GPU process. In June 2020, the City Council approved the Preferred Plan Concept, which is now part of the proposed 2021 GPU.

During Phase 3, the GPAC reviewed key goals and provided guidance for the policy frameworks of the 2021 General Plan Update, which culminated in the preparation of drafts of the 2021 General Plan Update, 2021-29 Housing Element, and Climate Action Plan, which were submitted for administrative review by City staff.

Phase 4 consists of environmental review of the Draft 2021 GPU. This EIR has been prepared pursuant to CEQA to identify the significant environmental impacts of implementation of the project along with mitigation measures to address those impacts. This Draft EIR has been made available for public review and comment concurrently with the Draft 2021 General Plan Update, 2021-29 Housing Element, and Climate Action Plan. A Final EIR which will include responses to public comments received will be prepared and presented to the Planning Commission and City Council for their respective review and consideration prior to adoption of the project.

## 2.1.5 2040 Vision and Guiding Principles

The Vision and Guiding Principles below form the basis for the project's policies. These are expressions of the collective hopes and aspirations that members of the Moreno Valley community have for the city's future and they were developed based on the valuable and meaningful input shared by community members throughout the planning process.

### 2.1.5.1 Dynamic Economy

- **Diversify the local economy**, building on strengths in health care, education, and attracting new businesses.
- Create a **flexible land use framework** that facilitates job growth and livability.
- Create **well-paying jobs** for locals in Moreno Valley to reduce the need for long commutes.
- Ensure **adequate infrastructure** to support local job growth.
- Partner with business, industry and educational institutions on **training and workforce preparedness** programs.
- Promote **tourism and attract visitors**, leveraging natural assets like Lake Perris.
- Improve **socioeconomic conditions** for all Moreno Valley residents.

### 2.1.5.2 Vibrant Gathering Places

- Foster **Town Centers** as places for locals and visitors to shop, dine, do business, and have fun.
- Create **inviting gateways** into Moreno Valley from freeways and major roadways.
- Provide **sports, recreation, and cultural facilities** that provide a range of options for youth, families, and seniors and attract visitors to Moreno Valley.
- Design and program public spaces that reflect Moreno Valley's **cultural diversity**.

### 2.1.5.3 Community Identity

- Build local pride and a **strong sense of place**.
- Make Moreno Valley a **Destination City** with a modern, innovative brand and become a model community where people choose to **live, work, and play**.
- Provide **activities for youth and families** to build community bonds.
- Support churches, community groups, and non-profit organizations to deliver **community services**.

### 2.1.5.4 Livable Neighborhoods

- Recognize that **housing affordability** is critical so people can grow up and grow older in Moreno Valley.
- Provide housing adapted to our **future needs and lifestyles**.

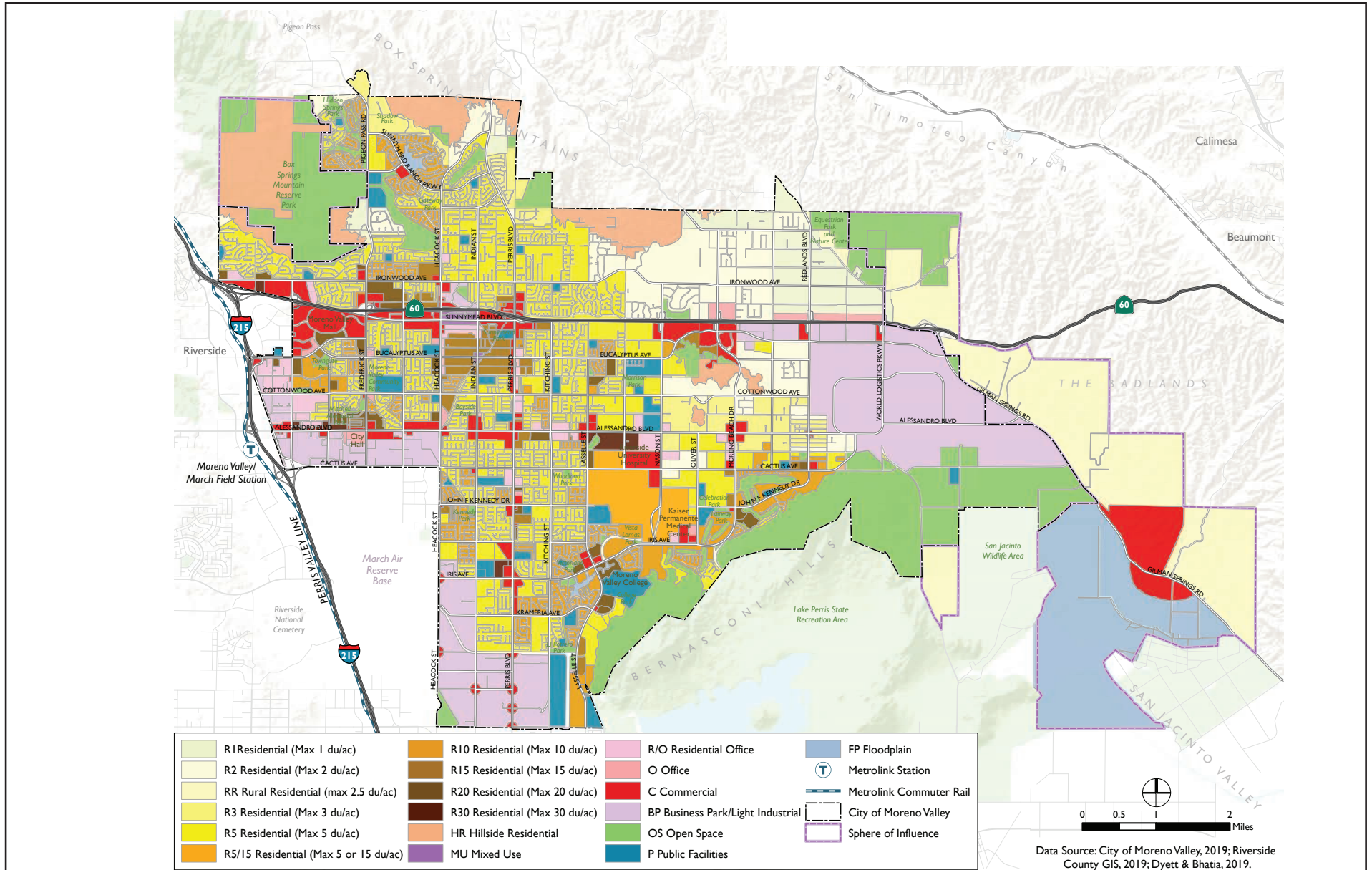
- Create opportunities for **neighborhood interaction**.
- Prioritize **safety** on roads, near schools, in public places, and in neighborhoods.
- Promote **active lifestyles** with trail connections, parcourses, and other recreational amenities.
- Prioritize clean air, water, fresh food, and **community health**.
- Maintain roads in good condition, improve traffic circulation, and plan for new technology that **optimizes mobility**.
- Ensure Moreno Valley is **livable and welcoming** for seniors, veterans, and other special needs groups.

## 2.2 Existing Physical Site Conditions

### 2.2.1 Land Use

Table 2-1 presents a summary of existing land uses based on 2019 data from the City and Riverside County. Figure 2-3 presents existing land uses within the Planning Area. Below is an overview of existing land use:

- **Residential** land uses account for nearly 32 percent (10,479 acres) of the land uses within the city limits, concentrated primarily in the western and central portions of the city where most development has historically occurred. Single-family housing accounts for the bulk of all residential uses within the city, while multi-family housing accounts for less than 3 percent. Established single-family neighborhoods include Hidden Springs, Sunnymead Ranch, and Moreno Valley Ranch. Single-family attached and multi-family housing is generally present in all residential neighborhoods, with the highest concentrations just south of the commercial stretch of Sunnymead Boulevard between Heacock Street and Perris Boulevard.
- **Commercial** land uses, including retail, office, and lodging, account for 2.3 percent (762 acres) of the land uses within the Planning Area, with no commercial uses located within the city's SOI. Within the city limits, commercial land uses account for 3 percent (994 acres) of citywide land use. Commercial uses are primarily concentrated in shopping centers such as the Moreno Valley Mall, TownGate Center, Moreno Valley Plaza, The District, Stoneridge Towne Center, Moreno Valley Auto Mall, Moreno Beach Plaza, Alessandro Plaza, and Sunnymead Towne Center. These areas include a mix of restaurants, retail stores, hotels, and personal services depending on the location. The Moreno Valley Mall and TownGate Highlands, Crossing, and Promenade at the western end of the city have the largest concentrations of commercial development.



**FIGURE 2-3**  
Existing General Plan Land Use

- **Industrial** land uses, including light industrial and general industrial, represent 3.7 percent (1,584 acres) of the Planning Area and 4.8 percent of the citywide land use, with no industrial land uses located within the SOI. Industrial land uses in Moreno Valley are clustered around three main areas: (1) between Alessandro Boulevard and Cactus Avenue, and Heacock Street and Elsworth Street (including the area formerly known as Centerpointe Business Park), (2) Moreno Valley Industrial Area, and (3) the State Route 60 (SR-60) Business Park Area. These existing industrial land uses are sited near the periphery of the city, proximate to freeway network access.
- **Public and Community Facilities** land uses occupy approximately 4.1 percent (1,756 acres) of the Planning Area. Within the city limits, public and community facilities land uses account for 5.3 percent (1,752 acres) of citywide land use. This includes a variety of public or semi-public lands, such as hospitals/care facilities (e.g., Riverside University Health System Medical Center, Kaiser Permanente Medical Center), churches/religious facilities, schools/educational facilities (e.g., Moreno Valley Unified School District, Val Verde Unified School District, Moreno Valley College), branches of government, and utilities. Schools/education facilities comprise the majority of this existing land use category with 866 acres of land, followed by utilities with 505 acres of land. The varied land uses of this category are dispersed throughout the city with more locations in the western and southern portions of the city.
- **Parks and Recreation** land uses, including parks and recreation spaces, greenways and open space, conservation lands, and golf courses, comprise approximately 19.4 percent (8,317 acres) of the Planning Area. Approximately 40 percent of the SOI are conservation lands. In the city, parks and recreation land uses account for about 12.5 percent (4,100 acres) of citywide land, mostly conservation lands and greenways/open space. Moreno Valley has several parks such as Gateway Park, Sunnymead Park, Woodland Park, Kennedy Park, the Equestrian Park and Nature Center, and the Hound Town Dog Park. These parks and other recreation areas are dispersed throughout the city.
- **Agriculture** land accounts for less than 1 percent of land within the city limit and approximately 38 percent of land within the SOI, although there is very limited active agricultural production within the SOI.
- **Vacant** land accounts for 27 percent (8,902 acres) of the land within the city limit. Vacant land is primarily located in the eastern part of the city, both north and south of SR-60. There are several major approved/in-progress developments sited on vacant lands. Within the SOI, approximately 13.7 percent (1,362 acres) of land is vacant.

See Section 4.11, Land Use/Planning for a complete discussion of the existing land use setting of the Planning Area.



**Table 2-1  
Existing Land Uses in Planning Area**

Existing Land Use Category	City of Moreno Valley		Sphere of Influence		Total Planning Area	
	Acres	Percent	Acres	Percent	Acres	Percent
Residential	10,479.4	31.8%	337.4	3.4%	10,816.8	25.2%
Single-Family Residential	9,375.2	28.4%	59.8	0.6%	9,435.0	22.0%
Multi-Family Residential	621.8	1.9%	-	0.0%	621.8	1.4%
Duplex/Two-Family Residential	234.6	0.7%	-	0.0%	234.6	0.5%
Mobile Home Parks	146.0	0.4%	-	0.0%	146.0	0.3%
Condominium/Townhomes	70.7	0.2%	-	0.0%	70.7	0.2%
Ag Residential	31.0	0.1%	277.7	2.8%	308.6	0.7%
Commercial	993.7	3.0%	-	0.0%	993.7	2.3%
General/Retail Commercial	852.0	2.6%	-	0.0%	852.0	2.0%
Office	89.7	0.3%	-	0.0%	89.7	0.2%
Service Station	28.9	0.1%	-	0.0%	28.9	0.1%
Hotel/Motel/Lodging Commercial	23.0	0.1%	-	0.0%	23.0	0.1%
Industrial	1,583.6	4.8%	-	0.0%	1,583.6	3.7%
General Industrial	1,119.4	3.4%	-	0.0%	1,119.4	2.6%
Light Industrial	464.1	1.4%	-	0.0%	464.1	1.1%
Public & Community Facilities	1,752.4	5.3%	3.3	0.0%	1,755.7	4.1%
Schools/Educational Facilities	866.3	2.6%	-	0.0%	866.3	2.0%
Utilities	502.0	1.5%	3.3	0.0%	505.4	1.2%
Church/Religious Facilities	161.3	0.5%	-	0.0%	161.3	0.4%
Public Facilities	115.0	0.3%	-	0.0%	115.0	0.3%
Hospitals/Care Facilities	107.8	0.3%	-	0.0%	107.8	0.3%
Parks & Recreation	4,114.5	12.5%	4,217.4	42.5%	8,331.9	19.4%
Conserved Lands	2,702.8	8.2%	3,973.0	40.1%	6,675.7	15.6%
Greenways/Open Space	861.3	2.6%	-	0.0%	861.3	2.0%
Golf Course	273.8	0.8%	244.5	2.5%	518.3	1.2%
Park Facilities	276.7	0.8%	-	0.0%	276.7	0.6%
Agriculture	189.4	0.6%	3,779.2	38.1%	3,968.6	9.2%
Other	13,885.7	42.1%	1,582.3	16.0%	15,468.0	36.0%
Vacant	8,902.3	27.0%	1,361.8	13.7%	10,264.1	23.9%
Transportation/Roads/ Right-of-Way	4,983.4	15.1%	220.5	2.2%	5,203.9	12.1%
<b>Total</b>	<b>32,997.0</b>	<b>100.0%</b>	<b>9,919.8</b>	<b>100.0%</b>	<b>42,916.7</b>	<b>100.0%</b>

SOURCE: Dyett & Bhatia 2020a.

## **2.2.2 Aesthetic/Topographical Features**

Moreno Valley is located in Riverside County in an east-west oriented valley bordered by the Box Springs Mountain Range to the north, the Badlands Mountain Range, also known as San Timoteo Badlands, to the northeast, and the Bernasconi Hills with Lake Perris to the southeast. Moreno Valley connects to the San Jacinto Valley in the southeast between the Badlands Mountain Range and Bernasconi Hills. To the west, lower hill ranges including Sycamore Canyon are located between the cities of Riverside and Perris. The Saddleback formation, which is part of the Santa Ana Mountain Range, lies further in the west beyond Lake Mathews.

Within the City, several hills and rock formations present natural landmarks, particularly on the east side between Moreno Beach Drive and Nason Street just south of SR-60, at Alessandro Boulevard and Lasselle Street, and along the northern edge of the City near Ironwood Avenue. The terrain gradually slopes from north to south, starting from the northern mountain range to the southern border of the city with an elevation change of approximately 300 feet between SR-60 and Iris Avenue. The nearest mountain ranges as well as the more distant San Bernardino Mountains, Santa Ana Mountains, and San Gabriel Mountains are visible from many locations in Moreno Valley, particularly higher elevations in the city.

Moreno Valley has a decentralized structure with commercial, retail, public and institutional uses distributed across the Planning Area, typically located along major arterials and at intersections of major arterials. Large-scale retail centers are concentrated along SR-60, with smaller neighborhood retail centers interspersed throughout the city fabric. Existing structures within the Planning Area consists primarily of auto-oriented low-density development. With the exception of medical facility buildings, most buildings in Moreno Valley are one or two stories high, with some multi-family buildings or hotels going up to four stories. Large distributions centers have building heights of up to 50-60 feet and building lengths generally between 600 and 900 feet.

## **2.2.3 Air Quality and Climate Conditions**

The Planning Area is located approximately 40 miles northeast of the Pacific Ocean, within Riverside County between the Santa Ana Mountains and the San Jacinto Mountains. Air quality in the county is influenced by both topographical and meteorological conditions. The Planning Area, like other inland valley areas in southern California, has a Mediterranean climate characterized by warm, dry summers and mild, wet winters. The March Field climate monitoring station (ID 045326) is located immediately southwest of the Planning Area and the Perris climate monitoring station (ID 046816) is located approximately five miles south of the Planning Area. Based on measurements taken at these climate monitoring stations, the average annual precipitation is 8 to 10 inches, falling primarily from November to April (Western Regional Climate Center 2020). Overall annual temperatures in the Planning Area average about 62 degrees Fahrenheit (°F), winter low temperatures average about 36°F, and summer high temperatures average about 93°F.

The Planning Area is located within the South Coast Air Basin (Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The 6,745-square-mile Basin encompasses Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and is bound by the Pacific Ocean to the west, the San Gabriel, San Bernardino, and San Jacinto mountains to the north and east, respectively, and San Diego County to the south. The Basin is designated as in attainment or unclassifiable attainment (expected to be meeting the standard despite a lack of monitoring data) for all federal air quality standards except 8-hour ozone and 2.5-micron particulate matter (PM<sub>2.5</sub>) standards. The Basin is designated as in nonattainment for state air quality standards for 8-hour ozone and PM<sub>2.5</sub>, and additionally is in nonattainment of state 10-micron particulate matter (PM<sub>10</sub>) standards. See Section 4.3, Air Quality for a complete discussion of the existing air quality setting of the Planning Area.

## **2.2.4 Cultural Resources and Tribal Cultural Resources**

Native American Indians were the first inhabitants of the Moreno Valley area. They hunted game, gathered seeds, and left evidence in rocks that they used to grind seeds. Early settlers traveled through the area from northern Mexico to various California Mission settlements along a trail charted by Juan Bautista de Anza in 1774. The trail passed through the San Jacinto Valley, the Perris Valley, and southwest Moreno Valley. Moreno Valley and the rest of California became part of the United States in 1850. The Moreno Valley area began to develop in the late 1880s with the establishment of the Alessandro and Moreno settlements. The community of Moreno was built around the intersection of Redlands Boulevard and Alessandro Boulevard. The community of Alessandro was located within the limits of present-day MARB.

Urban development began after the establishment of the March Air Force base in 1927, and the unincorporated communities of Sunnymead, Moreno, and Edgemont grew up around the base. From 1957 to 1989, the present-day Moreno Valley Mall was the site of the Riverside International Raceway, a motorsports racetrack and road course considered one of the finest in the country in its day.

The area experienced a period of rapid population growth between 1970 and 1992, fueled by the construction of new homes and businesses. During that period, the population went from approximately 19,000 residents to over 118,000. In 1984, the communities of Edgemont, Sunnymead, and Moreno came together to form the city of Moreno Valley and the first General Plan was adopted in 1986 to guide future growth and development.

The records search completed for the Planning Area identified a total of 110 historic-era resources, 227 prehistoric resources, and 12 multi-component (prehistoric and historic) resources. The records search also identified 25 built environment resources. Historic-era site types include adobe buildings, canals/aqueducts, cisterns, wells, foundations, walls, trash scatters, farms/ranches, highway, military property, single-family property, and multi-family property. Prehistoric sites include bedrock milling features, cairns, rock shelters, lithic scatters, ground stone scatters, ceramic scatters, and rock art. See Section 4.5, Cultural and

Tribal Cultural Resources for a complete discussion of the existing cultural setting of the Planning Area.

### **2.2.5 Geology and Soils**

The city lies in the northern portion of the Peninsular Ranges Physiographic Province of California, at the eastern margin of a structural block known as the Perris Block. This structural block is a mass of granitic rock, generally bound by the San Jacinto Fault, the Elsinore Fault, and the Santa Ana River. The geologic and seismic setting of Moreno Valley is dominated by the proximity of the Holocene-active San Jacinto Fault, which traverses the city's eastern boundaries. The potential for major earthquake damage to Moreno Valley is from activity along this fault zone (City of Moreno Valley 2006a).

The city is located within the seismically active southern California region. Earthquakes resulting from fault movement can result in surface rupture along an active or potentially active fault. The San Jacinto Fault Zone, which has been categorized as an Alquist-Priolo Earthquake Fault Zone, traverses the northeastern boundary of the city. The San Jacinto Fault Zone is composed of several parallel faults that together constitute the zone.

The majority of the city is classified as having low or moderate potential for liquefaction susceptibility. Small amounts of land within the western and southern portion of the city are classified as having high potential for liquefaction susceptibility, and a small amount of land along the southern border is classified as having very high potential for liquefaction susceptibility. However, geotechnical analysis completed for recent site-specific projects located within the area identified as having a high liquefaction potential north of Cactus Avenue did not identify any soils within the proposed footprints with high potential for liquefaction. The majority of the city is relatively flat and has been assigned a landslide susceptibility class of 0 (No Risk) by the California Geological Survey. However, some areas within the northern, northeastern, and southeastern portions of the city and within the SOI have been assigned landslide susceptibility classes ranging from V (Moderate Risk) to X (High Risk). Some areas within the central portion of the city have also been assigned a landslide susceptibility classes ranging from V (Moderate Risk) to X (High Risk). See Section 4.7, Geology/Soils for a complete discussion of the existing geologic setting of the Planning Area.

### **2.2.6 Hydraulic Conditions**

The city is located within the Santa Ana River and the San Jacinto River watersheds. The Santa Ana River is the largest river in the south coast region, with a length of 100 miles and approximately 2,700 square miles of watershed area. The river exits the San Bernardino Mountains and continues westward to the Prado Dam, through the Santa Ana River Canyon, and then flows to the ocean. In addition to being a major flood control facility, the river also serves as a means by which groundwater basins are recharged and provides important wildlife habitat. The San Jacinto River drains approximately 540 square miles to the Railroad Canyon Reservoir (Canyon Lake) which discharges into Lake Elsinore, which

discharges into a tributary of the Santa Ana River. Discharges from the two lakes are very rare.

Surface water quality in the Planning Area is regulated by the Santa Ana Regional Water Quality Control Board (RWQCB) Region 8. The Santa Ana Regional Water Quality Control Board Basin Plan (Basin Plan) (California Water Boards, Santa Ana – Region 8 2008) establishes water quality standards for all the ground and surface waters of the region. The Santa Ana RWQCB does not identify any water bodies within the Planning Area or which the Planning Area drains into as currently lists on the 303(d) list. The Planning Area lies within the San Jacinto groundwater basin. See Section 4.10, Hydrology/Water Quality for a complete discussion of the existing hydrological setting of the Planning Area.

## 2.2.7 Noise

Moreno Valley is subject to typical urban noises such as noise generated by traffic, heavy machinery, and day-to-day outdoor activities. The city also has several transportation-related noise sources, including airport noise, railroad operations, major arterials, Interstate 215 (I-215) and SR-60. Noise sources that are not directly related to transportation include noise from commercial and industrial centers, construction, and property maintenance activities.

Ambient noise levels were measured within the Planning Area to provide a characterization of the variability of noise and to assist in determining constraints and opportunities for future development. Ten 15-minute daytime noise level measurements were conducted throughout the Planning Area that identified average measured noise levels ranging from 60.1 A-weighted decibels one-hour equivalent sound level [dB(A)  $L_{eq}$ ] to 74.8 dB(A)  $L_{eq}$ .

MARB is a joint-use civilian and military facility located southwest of the Planning Area. MARB is bordered by the city to the east/northeast, city of Riverside to the northwest, the city of Perris to the south, and unincorporated Riverside County to the west. The Airport Influence Area (AIA) extends up to 9 miles north, west, and east of the main runway and 14 miles to the south, and covers land within unincorporated Riverside County and the cities of Menifee, Moreno Valley, Perris, and Riverside. Land uses in the immediate vicinity of MARB generally consist of public/institutional uses to the west, office/business park and industrial uses to the northwest, office/business park and commercial uses to the north, open space and residential uses to the northeast, open space, business park, and industrial uses to the southeast, and open space, agricultural uses, office/business park, industrial, and residential to the south. See Section 4.13, Noise for a complete discussion of the existing noise setting of the Planning Area.

## 2.2.8 Transportation

The city is connected regionally by SR-60 and I-215. SR-60 bisects the city and provides east-west connectivity to surrounding metropolitan areas. I-215 borders the city on the west and provides north-south connectivity. According to the existing 2006 General Plan, there are five basic functional systems that make up the local roadway system: divided major arterials, divided arterials, arterials, minor arterials, and collector streets. The classification of streets

is based on a functional hierarchy defined by the number of travel lanes, roadway width (curb to curb), right-of-way (public property line to public property line), and traffic volumes. The network of streets provides connectivity within the city and to neighboring communities. Pedestrian facilities in Moreno Valley consist of sidewalks and crosswalks, along with multi-use trails. Most residential and commercial developments provide sidewalks on public streets and internal circulation. Areas with no existing sidewalks are mainly located in undeveloped areas or in a more rural area in the eastern portion of the city and along the city boundary.

The Riverside Transit Agency (RTA) provides the majority of public transportation within the Planning Area via fixed route and paratransit bus services. RTA provides routes within the city that connect to major destinations such as the Moreno Valley/March Field Metrolink Station, Perris Station Transit Center, University of California, Riverside (UCR), and Moreno Valley Mall. Major Moreno Valley bus routes include Routes 11, 16, 18, 19, 19A, 20, and 31. In addition, RTA has one commuter link express bus route within the city. Route 208 connects the cities of Temecula, Murrieta, Perris, Moreno Valley, and Riverside. Commuter link express bus routes provide peak hour services for commuters in the morning and evening on weekdays. Route 31 also provides connections to Beaumont, Banning, Hemet, and San Jacinto and passengers can transfer in Beaumont to Sunline Route 10 for service to the Coachella Valley. RTA also provides Dial-A-Ride services for seniors and persons with disabilities.

Metrolink is a commuter rail program operated by the Southern California Regional Rail Authority (SCRRA), providing service from outlying suburban communities to employment centers such as Burbank, Irvine, and downtown Los Angeles. For Moreno Valley, the Moreno Valley/March Field Metrolink Station is located less than one-half mile west of the city limits. The 91/Perris Valley Line train services Metrolink stations in the cities of Perris, Riverside, Corona, Fullerton, Buena Park, Norwalk/Santa Fe Springs, and Los Angeles. See Section 4.16, Transportation for a complete discussion of the existing transportation setting of the Planning Area.

### **2.2.9 Utility and Services**

Water service in Moreno Valley is provided by two agencies. Eastern Municipal Water District (EMWD) supplies most of the city, except for a 430-acre area on the west side which is served by Box Springs Mutual Water Company. Wastewater service in Moreno Valley is provided by two agencies. EMWD provides collection and treatment for most of the city, while the Edgemont Community Services District serves a 430-acre area in the western part of the city that includes the Edgemont neighborhood.

Southern California Edison (SCE) and the Moreno Valley Electric Utility (MVU) provide electricity to the city. SoCalGas provides the city with natural gas service. SoCalGas' service territory encompasses approximately 20,000 square miles and more than 500 communities. The City provides trash, recycling, and special waste handling services to residents and businesses through a exclusive franchise agreement with Waste Management. No other haulers are authorized to operate within the city. The majority of solid waste generated within the city is disposed of at Badlands Sanitary Landfill, located north of SR-60 and west

of Interstate 10 off Ironwood Avenue. Two other landfills within the county of Riverside have the capacity to serve the city; however, a majority of waste is brought to the Badlands Sanitary landfill. See Section 4.17, Utilities/Service Systems for a complete discussion of the existing providers serving the Planning Area.

### **2.2.10 Vegetation**

The majority of land within the city consists of Developed/Disturbed Land. Natural vegetation is primarily located in the eastern portion of the city, as well as along the southeastern and northern boundaries of the city. Undeveloped lands within the city are typically comprised of disturbed lands and non-native grasses due to the prior history of cultivation. Small pockets of riparian vegetation occur within urban canyons and native habitats and species that once inhabited the area are largely limited to areas around the fringes of the city where lands are in proximity to surrounding conserved natural areas. A number of nearby natural areas exist adjacent to the city. The San Jacinto Wildlife Area, located at the southeast corner of the Planning Area, is a 12,000-acre wildlife preserve noted for its diversity of migratory birds. Other conserved lands surrounding the city include the Lake Perris Recreation Area located adjacent to the southern city limits, and the Box Springs Mountain Reserve Park located northwest of the city limits. See Section 4.4, Biological Resources for a complete discussion of the existing vegetation setting of the Planning Area.

### **2.2.11 Wildlife**

Varied topography and landforms including Box Springs Mountain in the north and the Badlands east of the city provide for a diversity of wildlife species. Mammals such as mule deer can be found in the Box Springs Mountains and in the Badlands. Large carnivores, such as coyotes, bobcats, badgers, and gray fox, have been found in the undeveloped portions of the city. Opossums, raccoons, skunks, cottontail rabbits, and rodent species are common to the Planning Area. A wide variety of reptiles are found in the Planning Area. Owls, hawks, and other birds of prey can be seen at various times throughout the year or during migration periods. See Section 4.4, Biological Resources for a complete discussion of the existing wildlife setting of the Planning Area.



## Chapter 3

# Project Description

Consistent with Section 15168 of the California Environmental Quality Act (CEQA) Guidelines, this Draft Environmental Impact Report (EIR) provides a programmatic analysis of the environmental impacts associated with implementation of the goals, policies, actions, and projected buildout of the following three planning documents:

- 2021 General Plan Update (GPU)
- 2021-2029 Housing Element Update
- Climate Action Plan (CAP)

These three separate planning documents are collectively referred to as the MoVal 2040 Project (project).

As described in Section 15168 of the CEQA Guidelines, program-level environmental review documents are appropriate when a project consists of a series of actions related to the issuance of rules, regulations, and other planning criteria. The project, which is the subject of this EIR, consists of long-term plans that will be implemented as policy documents guiding future development activities and City of Moreno Valley (City) actions.

California Government Code Section 65300 et seq. mandates that all counties and incorporated cities prepare a general plan that establishes policies and standards for future development, housing affordability, and resource protection. State law encourages cities to keep general plans current through periodic updates. The project includes an update to the 2006 General Plan that would guide future land use decisions in Moreno Valley, provide a long-term vision for the city, and provide policies and implementing actions that would allow the City to achieve this vision over the life of the General Plan. The General Plan would be the primary policy document guiding growth and development within the city through the planning horizon year of 2040. Together with the Zoning Ordinance and related sections of the Municipal Code, the 2021 GPU would serve as the basis for planning-related decisions



made by City staff, the Moreno Valley Planning Commission, and the Moreno Valley City Council.

The project includes an update to the currently adopted 2014 Housing Element. The Housing Element is one of the state-mandated elements that must be included in the City's General Plan. State law mandates that the Housing Element include certain items, such as a Housing Needs Assessment; goals, policies, and objectives regarding housing in Moreno Valley; and implementation programs to work toward achieving those goals. As part of the project, the City will prepare a Sixth Cycle Housing Element Update to cover the eight-year planning period from October 2021 through October 2029 and outline a plan for accommodating Moreno Valley's share of the regional housing need, currently determined to be a total of 13,627 newly constructed residential dwelling units. As required by the State of California, the City must zone sufficient land for housing affordable to persons at all income levels.

The project includes preparation of a CAP. The CAP is a community-wide strategy for reducing greenhouse gas (GHG) emissions for the purpose of adapting to the effects of climate change. Preparation of the CAP includes establishing the City's GHG reduction targets, as well as specific strategies and implementing actions to achieve these targets.

This chapter introduces the objectives of the project and includes a description of the existing regional and local project setting, an outline of the projected population and employment growth rates, and development patterns through the planning horizon year. Furthermore, this chapter presents the proposed General Plan land use diagram, key data tables, and a description of policy direction for the 2021 GPU, Housing Element Update, and CAP preparation. This project description provides the basis for the environmental analysis in Chapter 4 and alternatives analysis in Chapter 5.

## **3.1 Statement of Objectives**

The project includes the 2021 GPU, Housing Element Update, and preparation of a CAP. As required under the CEQA Guidelines, this section provides a description of the project's purpose and objectives (California Code of Regulations [CCR] 15124).

### **3.1.1 Purpose**

California Government Code Section 65300 requires each city and county in California to adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which...bears relation to its planning." The Moreno Valley General Plan can be considered the City's development constitution, containing both a statement of the community's vision of its long-term development, as well as the policies to support that vision by guiding the physical growth of the city. The 2021 GPU contains policies to guide decision-making related to land use and community character; economic development; transportation; parks and public services; safety; noise; environmental justice; healthy communities; open space and resource conservation; and housing. The 2021 GPU is a document to be adopted by the City Council that serves the following purposes:

- Establish a long-range vision that reflects the aspirations of the community and outlines steps to achieve this vision;
- Establish long-range development policies that will guide City departments, Planning Commission, and City Council decision-making;
- Provide a basis for judging whether specific development proposals and public projects are in harmony with plan policies;
- Plan in a manner that meets future land needs based on the projected population and job growth;
- Allow City departments, other public agencies, and private developers to design projects that will enhance the unique character of the community, preserve environmental resources, and minimize hazards; and
- Provide the basis for establishing and setting priorities for detailed plans and implementing programs, such as the zoning ordinance, subdivision regulations, specific and master plans, and the Capital Improvement Program.

The 2021 GPU would replace the existing 2006 General Plan and all of its elements and establish a planning and policy framework that extends to a horizon year of 2040.

The updated Housing Element would cover the period from October 2021 through October 2029, and outline a plan for accommodating Moreno Valley's share of the Regional Housing Needs Allocation (RHNA), determined to be 13,627 constructed residential dwelling units. As required by the State of California, the City must zone sufficient land for housing affordable to persons of all income levels.

The CAP establishes a community-wide strategy for reducing GHG emissions and adapting to the effects of climate change. The CAP also contains actions that demonstrate the City's commitment to achieving the state's GHG reduction targets through monitoring and reporting processes to ensure that targets are met, and options for reducing GHG emissions beyond the state's requirements.

### **3.1.2 Objectives**

As required under CEQA Section 15124, the following specific objectives have been established for the project:

- Provide a flexible land use framework that can accommodate job growth in a variety of industries over time while enhancing quality of life in the community;
- Build a strong, diverse economy with well-paying jobs in the city for local residents, in order to reduce the need for long commutes and achieving a better balance of jobs-to-housing;
- Ensure a sustainable, measured rate of growth and efficient delivery of public services;

- Create a destination Downtown Center that makes Moreno Valley a destination city with a modern, innovative brand and that establishes Moreno Valley as a model community where people choose to live, work, and play;
- Focus new residential and commercial development in corridors to support more frequent and reliable transit service; promote walking and biking; and reduce vehicle miles travelled;
- Foster development of gateways at key entry points into the community that announce arrival with attractive architecture and inviting uses to build Moreno Valley's sense of place;
- Facilitate development of a range of housing options that provides for the needs of current and future residents, including people of all ages, abilities, and incomes levels;
- Accommodate the City's 2021-2029 RHNA allocation;
- Reduce community-wide GHG emissions consistent with statewide targets;
- Foster vibrant gathering places for locals and visitors to shop, dine, do business, and have fun, providing a range of social interaction opportunities for youth, families, and seniors;
- Enhance neighborhood livability through promoting active lifestyles with indoor and outdoor recreational amenities and prioritizing clean air, water, fresh food, and community health; and
- Encourage mindful stewardship of water, energy, and other environmental resources, and explore technological advancements as a way to enhance current and future needs and a diversity of lifestyles.

## 3.2 Project's Component Parts

The project consists of the following three separate planning documents.

- The 2021 GPU would incorporate changes to the policy framework and land use designations of the existing 2006 General Plan to guide development and conservation through 2040 and comply with new state laws.
- The Housing Element Update for the 2021-2029 planning period would provide the City with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community.
- The proposed CAP would establish a community-wide strategy for reducing GHG emissions and adapting to the effects of climate change.

First and foremost, the project responds to community aspirations expressed throughout the MoVal 2040 process. Secondly, the project responds to new legal requirements that have come into force, including requirements for addressing geologic hazards, flooding, wildland and urban fires, and environmental justice. A description of all three of these separate documents is provided below.

## 3.2.1 General Plan Update

### 3.2.1.1 Plan Organization

The organizational structure of the existing 2006 General Plan has been modified in the proposed 2021 GPU. Additionally, some elements have been reorganized and the proposed 2021 GPU adds optional elements that reflect local community priorities identified through stakeholder interviews and public outreach not included in the existing 2006 General Plan.

The proposed 2021 GPU addresses the eight state-mandated elements of Land Use, Circulation, Housing, Conservation, Open Space, Noise, Safety, and Environmental Justice, supplemented with three optional elements: Economic Development, Community Character, and Healthy Community.

Each element of the proposed 2021 GPU characterizes issues and opportunities, and then presents goals, policies, and actions that would address them. Within this structure, goals describe general desired results that the community seeks to create through the implementation of the proposed 2021 GPU. The policies and actions establish the “who,” “how,” and “when” for carrying out the “what” and “where” of the goals.

The chapters of the proposed 2021 GPU are summarized as follows.

- **Chapter 1: Introduction.** This chapter outlines the purpose and uses of the General Plan; provides a community profile; recaps the General Plan update process; summarizes the Vision and Guiding Principles for Moreno Valley’s future growth and development; and provides an overview of the General Plan organization, relationship to other plans, and requirements for administration.
- **Chapter 2: Land Use and Community Character.** This element satisfies the legal requirements for a General Plan land use element and provides a map showing the distribution and location of land uses. It also includes standards for density and intensity and considers growth impacts on military readiness. This element combines land use, a required topic by state law, and community character, an optional topic that is a clear priority for the community based on outreach to decision makers and its relationship to economic development. This element describes the existing land use pattern and provides an explanation of the General Plan’s approach to citywide growth. The goals and policies in this chapter provide the framework for land use and development in the city. Community character topics addressed include the city’s structure, gateways, corridors, centers (with a special focus on downtown), neighborhoods, design of parks and public spaces, and hillside development. The key goals for the Land Use and Community Character Element include:
  - Establish an identifiable city structure and a flexible land use framework that accommodates growth and development over the planning horizon;
  - Foster vibrant gathering places for Moreno Valley residents and visitors;
  - Build a distinctive sense of place and pride in Moreno Valley; and

- Expand the range of housing types in Moreno Valley and ensure a variety of options to suit the needs of people of all ages and income levels.
- **Chapter 3: Economic Development.** This optional element provides an overview of the population and employment context in Moreno Valley, and outlines goals and policies to support a strong, dynamic economy including:
  - Diversify and grow the local economy;
  - Strengthen and retain existing businesses;
  - Enhance Moreno Valley’s profile and competitive position; and
  - Promote education and workforce development.
- **Chapter 4: Circulation.** This element satisfies the legal requirements for addressing the topic of circulation and provides a circulation diagram identifying major thoroughfares; transportation routes for vehicles, transit, bicycles, and pedestrians; and also military airports. The element also includes policies for “complete streets,” which would provide a balanced, multimodal transportation network serving all users and abilities. The key goals for the Circulation Element include:
  - Strengthen connections to the regional transportation network;
  - Plan, design, construct, and maintain a local transportation network that provides safe and efficient access throughout the city and optimizes travel by all modes;
  - Manage the city’s transportation system to minimize congestion, improve flow, and improve air quality;
  - Provide convenient and safe connections between neighborhoods and destinations within Moreno Valley;
  - Enhance the range of transportation options in Moreno Valley and reduce vehicle miles travelled; and
  - Provide for safe, efficient goods movement by road, air, and rail.
- **Chapter 5: Parks and Public Services.** This element satisfies legal requirements for addressing the topics of open space for outdoor recreation and the location and extent of public utilities, including water, sewer, stormwater, and electricity. This element also provides background information and a policy framework related to police and fire services, schools, community facilities and libraries, and parks and recreation. The key goals for the Parks and Public Services Element include:
  - Provide and maintain a comprehensive system of quality parks, multi-use trails, and recreational facilities to meet the needs of Moreno Valley's current and future population;
  - Locate, design, and program public facilities as contributors to neighborhood quality of life;
  - Provide for responsive police and fire services that ensure a safe and secure environment for people and property; and

- Provide for utilities and infrastructure to deliver safe, reliable services for current and future residents and businesses.
- **Chapter 6: Safety.** This element satisfies the legal requirements for addressing the topic of safety and community protection from wildfires, flooding, seismic events, landslides, dam inundation, and climate change. This element includes background information, policies, and standards for community protection from natural and human-made disasters, including promoting safety and compatibility with the March Air Reserve Base (MARB) adjacent to city limits. The key goals for the Safety Element include:
  - Protect life and property from natural and humanmade hazards;
  - Provide effective response to disasters and emergencies;
  - Build community resilience to climate change; and
  - Minimize airport safety hazards and promote compatibility with MARB operations.
- **Chapter 7: Noise.** This element satisfies the legal requirements for addressing the topic of noise and identifies noise sources, quantifies future noise levels through a contour map, and establishes measures to address noise issues. The key goals for the Noise Element include:
  - Design for a pleasant, healthy sound environment conducive to living and working; and
  - Ensure that noise does not have a substantial, adverse effect on the quality of life in the community.
- **Chapter 8: Environmental Justice.** This element satisfies the legal requirements in planning for Senate Bill (SB) 535-identified “Disadvantaged Communities” including addressing the topics of air quality and pollution exposure; safe and sanitary homes; public facilities and physical activity; healthy food access; and civic engagement and investment prioritization. The key goals for the Environmental Justice Element include:
  - Reduce pollution exposure and improve community health;
  - Promote safe and sanitary housing for Moreno Valley residents of all ages, abilities, and income levels;
  - Expand access to high-quality, fresh, and healthy food; and
  - Encourage the active participation of local residents and businesses in civic life.
- **Chapter 9: Healthy Community.** This optional element is closely linked to the Environmental Justice Element and contains background information and policies aimed to focus engagement to target youth and address linguistic isolation; provide opportunities for social connections; provide an array of health care options; and

promote businesses that support healthy and active lifestyles. The key goals for the Healthy Community Element include:

- Promote the health and well-being for those who live, work, and play in Moreno Valley;
  - Engage community members and community partners in efforts to create a healthier Moreno Valley; and
  - Promote a variety of businesses that help support community health.
- **Chapter 10: Open Space and Resource Conservation.** This element satisfies the legal requirements for addressing the topic of conservation including natural resources (water, air, biological), tribal cultural resources, and open space for environmental and scenic conservation. This element includes background information and policies relating to resource conservation, environmental protection, energy and water conservation, and reuse and recycling. The key goals for the Open Space and Resource Conservation Element include:
    - Preserve, protect, and enhance natural resources, habitats, and watersheds in Moreno Valley and the surrounding area, promoting responsible management practices;
    - Preserve and respect Moreno Valley's unique cultural and scenic resources, recognizing their contribution to local character and sense of place;
    - Minimize air, soil, and water pollution, as well as community exposure to hazardous conditions;
    - Use energy and water wisely and promote reduced consumption; and
    - Optimize the use of available resources by encouraging residents, businesses, and visitors to reuse and recycle.

### 3.2.1.2 Concept Areas

The 2021 GPU primarily focuses future development and redevelopment within proposed Concept Areas as shown on Figure 3-1. These Concept Areas consist of areas within the city limits where clusters of vacant and underutilized land present significant opportunity for development that can help achieve the objectives of the 2021 GPU, or where prior planning initiatives have identified significant change. Portions of the Planning Area located outside of these proposed Concept Areas would retain the current land use designations established under the existing 2006 General Plan. A description of each of the proposed Concept Areas is provided below.

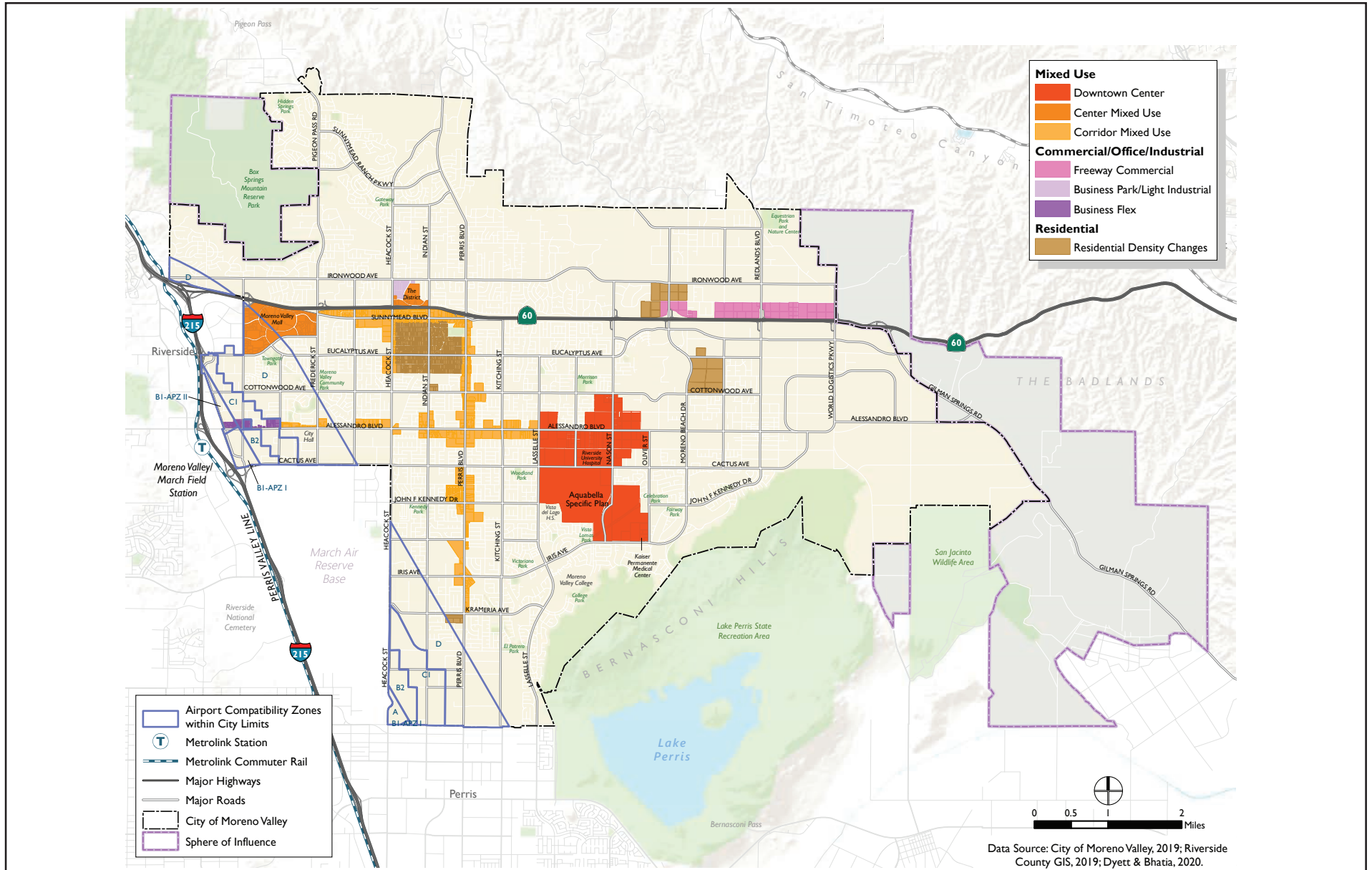


FIGURE 3-1  
2021 General Plan Update Concept Areas



### **a. Downtown Center**

The 2021 GPU proposes a Downtown Center Concept Area that would be located in the central portion of the city, bordered by Cottonwood Avenue to the north, Iris Avenue to the south, Lasselle Street to the west, and Oliver Street to the east. The Downtown Center area would consist of approximately 1,200 acres, and is currently approximately 80 percent vacant.

The southern portion of the Downtown Center includes the Aquabella Specific Plan area. Aquabella is a gated active-adult community approved for 2,900 dwelling units on 685 acres between Brodiaea Avenue and Iris Avenue. Adopted in 2005, and as of yet not constructed, the Aquabella Specific Plan area may experience modification as the Downtown Center evolves.

The Downtown Center would also encompass the two major medical centers in the city (Riverside University Health System and Kaiser Permanente Moreno Valley). The recently completed/planned expansions of both major medical centers would be an important component of the Downtown Center's goal to grow into a "live, work, and play" destination. The medical corridor that these two major medical centers anchor would likely attract other related medical, health and wellness amenities and businesses to locate within the City and bring more jobs and people to the Downtown Center to support public and private improvements/investments.

An existing mobile home park is located adjacent to the Riverside University Health System Medical Center at the southwestern corner of the intersection of Nason Street and Alessandro Boulevard. This mobile home park may experience modification as the Downtown Center evolves. Nason Street (north-south) and Alessandro Boulevard (east-west) are two of the city's primary thoroughfares and form an important axis for getting to, from, and around the Downtown Center. The Moreno Valley Town Center Project is located at the northwestern corner of the intersection of Nason Street and Alessandro Boulevard. This public-private partnership project would be incorporated into the Downtown Center area and would likely serve as one of the early catalysts for the Downtown Center's development into a primary hub and focal point of the community with easy access from all parts of the city.

The Downtown Center is envisioned to be a regional draw with activity day through night and an architectural design and atmosphere to rival anything in the surrounding region and to distinguish the downtown apart from other areas of the city. Highlighted design features and aspirations envisioned for the Downtown Center include inviting gateways/monuments; grand boulevards with a distinctive, inviting character that announce arrival in Downtown Moreno Valley; planted medians, tall trees, and branded signage and street lighting; courtyards and plazas; pedestrian paths and multiuse trails; and a destination "Central Park."

The Downtown Center is envisioned to provide a vibrant mix of business, entertainment, residential, cultural, and civic uses that integrate existing uses (e.g., Riverside University Health System and Kaiser Permanente Moreno Valley medical centers; Moreno Valley College; Vista del Lago High School) and layers compatible new land uses and public

amenities together at different scales and intensities to foster an exciting blend of places to live, work, and play.

The Downtown Center is a bold idea that advances the vision for a dynamic local economy and vibrant gathering places, and there is strong community support for this concept. Community feedback regarding the Downtown Center has expressed desire for a “Central Park” recreation opportunity as well as performing arts, sports, civic, and entertainment facilities—all within a pedestrian/bike-friendly atmosphere where it is convenient and safe to explore and enjoy the area without a car.

## **b. Community Centers**

The 2021 GPU proposes two Community Center Concept Areas in the western portion of the city at the existing Moreno Valley Mall and The District shopping centers. The Moreno Valley Mall is generally bounded by SR-60 to the north, Towngate Boulevard to the south, Frederick Street to the east, and Day Street to the west. The Moreno Valley Mall was opened in 1992 and since that time, small and large tenants of the mall have left. With the prominence and popularity of e-commerce, the future viability of the mall is noted to be a challenge by many community members, but also as an opportunity for creative redevelopment with a mix of uses, including housing, that can be attractive to locals and visitors.

The District shopping center is generally bounded by Ironwood Avenue to the north, Hemlock Avenue and SR-60 to the south, Indian Street to the east, and Heacock Street to the west. The District, formerly known as Festival at Moreno Valley, is a shopping center that has experienced turnover of small and large tenants in recent years. The District is surrounded by existing single-family homes to the east and undeveloped lands to the north and west.

Both Community Centers would be developed as community-oriented mixed use centers that would complement the Downtown Center. The Community Centers concept would broaden the range of uses allowed on these two existing commercial properties at prominent locations visible from freeways (SR-60 and I-215), would foster distinctive gateways into the city, and generate an enhanced sense of place. The 2021 GPU includes the Community Centers concept to help provide a wider range of housing choices affordable to all ages and income levels; create inviting gateways at highly visible locations; attract local residents and freeway travelers; and strengthen identifiable landmarks of the community.

## **c. Community Corridors**

The 2021 GPU proposes Community Corridors Concept Areas along existing major transit corridors of Sunnymead Boulevard, Alessandro Boulevard, Perris Boulevard, and Heacock Street. These proposed Community Corridors currently consist of clusters of vacant and underutilized land that would be available for development in the near-term. The Community Corridors Concept Areas would promote a mix of residential, commercial, and professional office uses for everyday needs, particularly suited to smaller business owners/entrepreneurs. The Community Corridors would also provide for a range of housing types that would include more affordable housing options located along existing major transit corridors that would support more frequent, reliable service. The Community Corridors

Concept Areas would also focus on retail/commercial uses in nodes at high visibility intersections where businesses would have the greatest chance of success.

#### **d. Highway Office/Commercial**

The 2021 GPU proposed a Highway Office/Commercial Concept Area in the northeastern portion of the city, north of SR-60, south of Ironwood Avenue, west of World Logistics Parkway, and east of Moreno Beach Drive. The Highway Office/Commercial Concept Area envisions the creation of an inviting gateway of retail, commercial, office, and other uses (e.g., employment campus; educational campus) at a highly visible, accessible location in Moreno Valley. There is opportunity with this Concept Area to attract visitors to the city's easterly gateway to help make Moreno Valley a destination city. To implement the Highway Office/Commercial Concept Area, the 2021 GPU would include design standards to blend new development with the existing rural heritage and ensure compatibility with surrounding residential uses.

#### **e. Business Flex**

The 2021 GPU proposed a Business Flex Concept Area in the western portion of the city, south of SR-60, generally along Alessandro Boulevard, and adjacent to MARB. Due to this area's proximity to MARB, airport land use regulations prohibit dense housing, schools, hospitals, and other gathering places. The Business Flex concept allows a range of light industrial and commercial businesses for consistency with airport regulations and responds to market demand for increased production, distribution, and repair activity spaces in urban areas. The Business Flex concept would create an inviting gateway at the western entry to the city. To implement the Business Flex concept, the 2021 GPU would provide for business activities involving production, distribution, or repair with supporting office and commercial space. Permitted uses would be consistent with applicable airport land use regulations and development standards (e.g., performance-based zoning) would integrate flex commercial uses with surrounding neighborhoods to ensure adequate buffering and compatibility.

#### **f. Residential Density Changes**

As part of the 2021 GPU, the City is updating the Housing Element for an eight-year planning period spanning October 2021 through October 2029. The 2021 GPU includes targeted residential density changes to provide for higher density housing to support the meeting of state obligations under RHNA. Moreno Valley's RHNA allocation for the Sixth Cycle Housing Element Update is a total of 13,627 units of total new construction.

### **3.2.1.3 Proposed Land Use Designations**

The 2021 GPU includes a consolidated set of land use designations to guide development in the Planning Area through 2040. This would include introduction of five new designations intended to focus growth within the Concept Areas described above in a manner that would support the Vision and Guiding Principles developed by the community. Other land use designations will be carried forward from the existing 2006 General Plan to the 2021 GPU.

Figure 3-2 presents the proposed land use map and Table 3-1 provides a summary of land uses proposed under the 2021 GPU.

<b>Table 3-1 2021 GPU Land Use Summary</b>						
Proposed Land Use Category	City of Moreno Valley		Sphere of Influence		Total Planning Area	
	Acres	Percent	Acres	Percent	Acres	Percent
<b>Residential</b>	<b>15,303</b>	<b>46.4%</b>	<b>4,812</b>	<b>48.5%</b>	<b>20,115</b>	<b>46.9%</b>
R1 Residential	963	2.9%	25	0.2%	988	2.3%
R2 Residential	2,184	6.6%	-	-	2,184	5.1%
Rural Residential	57	0.2%	3,936	39.7%	3,993	9.3%
R3 Residential	1,055	3.2%	-	-	1,055	2.5%
R5 Residential	6,284	19.0%	-	-	6,284	14.6%
R10 Residential	2,525	7.7%	-	-	2,525	5.9%
R15 Residential	311	0.9%	-	-	311	0.7%
R20 Residential	705	2.1%	-	-	705	1.6%
R30 Residential	35	0.1%	-	-	35	0.1%
Hillside Residential	1,183	3.6%	852	8.6%	2,034	4.7%
<b>Mixed Use</b>	<b>2,372</b>	<b>7.2%</b>	<b>-</b>	<b>-</b>	<b>2,372</b>	<b>5.5%</b>
Downtown Center	1,255	3.8%	-	-	1,255	2.9%
Center Mixed Use	315	1.0%	-	-	315	0.7%
Corridor Mixed Use	803	2.4%	-	-	803	1.9%
<b>Commercial/Office/Industrial</b>	<b>5,772</b>	<b>17.5%</b>	<b>581</b>	<b>5.9%</b>	<b>6,353</b>	<b>14.8%</b>
Commercial	625	1.9%	581	5.9%	1,206	2.8%
Residential/Office	193	0.6%	-	-	193	0.4%
Highway Office/Commercial	264	0.8%	-	-	264	0.6%
Office	63	0.2%	-	-	63	0.1%
Business Park/Light Industrial	4,585	13.9%	-	-	4,585	10.7%
Business Flex	41	0.1%	-	-	41	0.1%
<b>Public/Quasi-Public</b>	<b>5,256</b>	<b>15.9%</b>	<b>4,337</b>	<b>43.7%</b>	<b>9,593</b>	<b>22.4%</b>
Public	968	2.9%	-	-	968	2.3%
Parks/Open Space	4,209	12.8%	1,647	16.6%	5,856	13.6%
Floodplain	80	0.2%	2,690	27.1%	2,770	6.5%
Transportation/Roads/Right-of-Way	4,294	13.0%	190	1.9%	4,484	10.4%
<b>Total</b>	<b>32,997</b>	<b>100%</b>	<b>9,920</b>	<b>100%</b>	<b>42,917</b>	<b>100%</b>

SOURCE: Dyett & Bhatia 2020a.

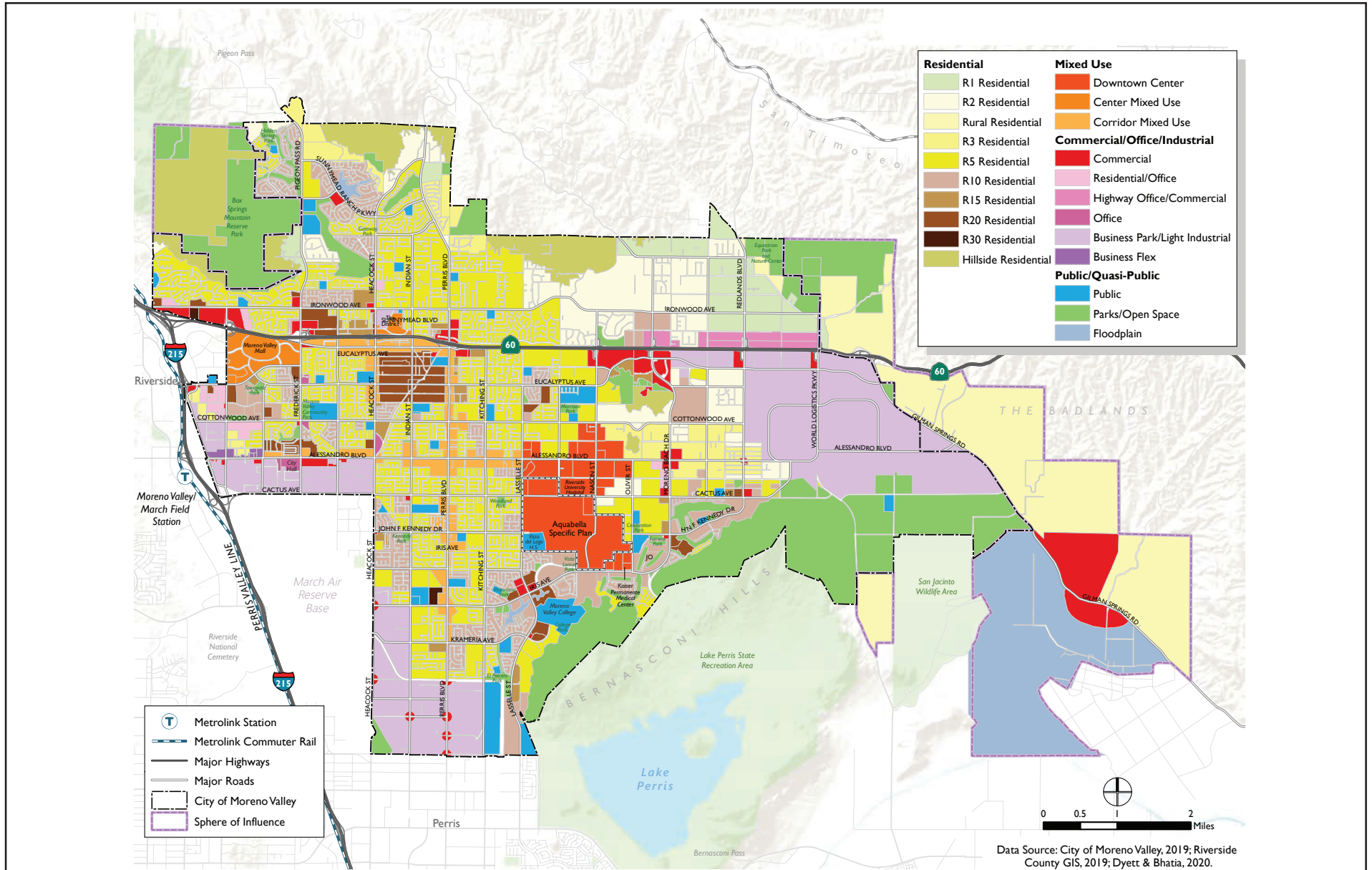


FIGURE 3-2  
2021 General Plan Update Proposed Land Use Map

**a. Downtown Center – *New Designation***

This designation would provide for development of a vibrant new Downtown Center at the heart of the city to serve as a focal point of the community and destination for people from around the region. It would allow for a vibrant mix of business, entertainment, residential, cultural, and civic uses to activate the Downtown Center throughout the day and into the evening. It integrates existing uses and layers compatible new land uses and public amenities together at various scales and intensities to foster a mix of uses that encourages people to live, work, play, and shop within the Downtown Center. To implement the Downtown Center, the 2021 GPU would describe the range of uses and activities envisioned and create a concept diagram that depicts the arrangement of uses in the wider area and circulation that connects them. The 2021 GPU provide an illustrative development program and phasing to guide environmental review and include policies that call for the creation of an Area Plan and flexible zoning tools to guide subsequent development. This designation would include policy that would allow for reconfiguration or redesign, so long as the overall development program is not exceeded, providing flexibility to accommodate market demand.

**b. Center Mixed Use (CEMU) – *New Designation***

This designation would provide for the redevelopment of existing commercial centers and adjacent properties with a range of commercial and residential uses to complement existing development at prominent entry points into the community. The centers are envisioned as integrated, pedestrian-oriented places with a mix of uses including retail, dining, entertainment, offices, lodging, recreational and cultural facilities that cater to both motorists passing through and residents of surrounding neighborhoods. The Centers may also incorporate higher-density housing on-site to support the vitality of commercial uses and activate the area. The maximum permitted floor area ratio (FAR) in the CEMU designation is 1.25, with a residential density range of 20 to 35 dwelling units per acre. On smaller parcels, additional FAR may be permitted to achieve the desired vision for the area.

**c. Corridor Mixed Use (COMU) – *New Designation***

This designation would provide for a mix of housing with supporting retail and services that would cater to the daily needs of local residents. Permitted uses would include housing, retail, restaurants, personal services, public uses, and professional business offices. Retail uses should be concentrated at intersections and are limited to no more than 25 percent of the maximum permitted FAR, excluding parking. A mix of uses is not required on every site but is desired on sites at intersections to foster nodes of commercial mixed-use development along the corridor. Mixed use may be in either a vertical format (multiple uses in the same building) or horizontal format (multiple single-use buildings on the same parcel). The allowable residential density is 15-25 dwelling units per acre, with densities on the lower end of that range where proposed development abuts existing low density residential development. Maximum permitted FAR for commercial uses is 1.0.

**d. Highway Office/Commercial – *New Designation***

This designation would provide for a distinctive employment or educational campus at the eastern gateway to the city. Primary permitted uses would include office, educational, and/or research and development facilities organized in a clustered development pattern with intervening areas of landscaped open space. Auxiliary commercial uses, including restaurant, retail, and service uses would also be permitted. The architectural style of development should reinforce the rural character intended for the surrounding area. The maximum permitted FAR in the Highway Office/Commercial designation is 0.4. On smaller parcels, additional FAR may be permitted to achieve the desired vision for the area.

**e. Business Flex – *New Designation***

This designation would provide for a range of business activities involving production, distribution, or repair with supporting office and commercial space. Permitted uses would include light manufacturing, research and development, warehousing and distribution, automobile services and repair, and other uses consistent with applicable airport land use compatibility regulations. Corresponding zoning will be performance-based to promote flexibility and minimize non-conformance issues with existing uses. The maximum permitted FAR in the Business Flex designation is 0.5.

**f. Commercial – *Carried Forward***

The primary purpose of areas designated Commercial would be to provide property for business purposes, including, but not limited to, retail stores, restaurants, banks, hotels, professional offices, personal services and repair services. The zoning regulations shall identify the particular uses permitted on each parcel of land, which could include compatible noncommercial uses. Commercial development intensity should not exceed a FAR of 1.00 and the average floor area ratio should be significantly less.

**g. Residential/Office – *Carried Forward***

The primary purpose of areas designated Residential/Office would be to provide areas for the establishment of office-based working environments or residential developments of up to 15 dwelling units per acre. The zoning regulations shall identify the particular uses and type of residential development permitted on each parcel of land. Overall development intensity should not exceed a Floor Area Ratio of 1.00.

**h. Office – *Carried Forward***

The primary purpose of areas designated Office would be to provide for office uses, including administrative, professional, legal, medical, and financial offices. The zoning regulations shall identify the particular uses permitted on each parcel of land, which could include limited non-office uses that support and are compatible with office uses. Development intensity should not exceed a FAR of 2.00 and the average intensity should be significantly less.

**i. Business Park/Light Industrial – *Carried Forward***

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

**j. Public – *Carried Forward***

The primary purpose of areas designated Public/Quasi-Public would be to provide property for civic, cultural and public utility uses, including, but not limited to schools, libraries, fire stations, museums, and government offices. The zoning regulations shall identify the particular uses permitted on each parcel of land. Development intensity should not exceed a FAR of 1.00 and the average FAR should be significantly less.

**k. Parks/Open Space – *Carried Forward***

The primary purpose of areas designated Parks/Open Space would be to provide areas that are substantially unimproved, including, but not limited to, areas for outdoor recreation, the preservation of natural resources, the grazing of livestock, and the production of crops. Development intensity should not exceed a FAR of 0.10 and the average FAR should be significantly less.

**l. Floodplain – *Carried Forward***

The primary purpose of areas designated Floodplain would be to designate floodplain areas where permanent structures for human occupancy are prohibited to protect the public health and safety. Development intensity should not exceed a FAR of 0.05.

**m. Hillside Residential – *Carried Forward***

The primary purpose of areas designated Hillside Residential would be to balance the preservation of hillside areas with the development of view-oriented residential uses.

- a. Within the Hillside Residential category, appropriate residential uses would include large lot residential uses. Lots smaller than one acre may only be permitted as clustered units to minimize grading, and other impacts on the environment, inclusive of the Multi-Species Habitat Conservation Plan.
- b. The maximum residential density within Hillside Residential areas shall be determined by the steepness of slopes within the project. The maximum allowable density shall not exceed one dwelling unit per acre on sloping hillside property and shall decrease with increasing slope gradient.
- c. Future development within Hillside Residential areas shall occur in such a manner as to maximize preservation of natural hillside contours, vegetation, and other



characteristics. Hillside area developments should minimize grading by following the natural contours as much as possible.

- d. Development within Hillside Residential areas shall be evaluated to determine the precise boundaries of the area. If the Community Development Director determines that adequate slope information is not available, applicants requesting to develop within these areas shall complete a slope analysis for the proposed development site. Portions of the development that exceed an average slope of 10 percent shall adhere to the policies within the Hillside Residential category. Portions of the development where the slopes are less than 10 percent on average shall adhere to policies within the adjacent land use category.

#### **n. Rural Residential – *Carried Forward***

The primary purpose of areas designated Rural Residential would be to provide for and protect rural lifestyles, as well as to protect natural resources and hillsides in the rural portions of the City.

- a. The maximum residential density within Rural Residential and areas shall be determined by the steepness of slopes within the individual project area. The maximum allowable density shall be 0.4 dwelling units per acre (an average lot size of 2.5 acres) on flat terrain and shall decrease with increasing slope gradient.
- b. Within the Rural Residential category, appropriate residential uses include large lot residential uses. Lots smaller than 2.5 acres may only be permitted as clustered units to minimize grading and other impacts on the environment, inclusive of the Multi-Species Habitat Conservation Plan.

#### **o. R1 Residential – *Carried Forward***

The primary purpose of areas designated R1 Residential would be to provide for and protect rural lifestyles. The maximum allowable density for projects within the Residential 1 areas shall be 1.0 dwelling unit per acre.

#### **p. R2 Residential – *Carried Forward***

The primary purpose of areas designated R2 Residential would be to provide for suburban lifestyles on residential lots larger than commonly available in suburban subdivisions and to provide a rural atmosphere. The maximum allowable density shall be 2.0 dwelling units per acre.

#### **q. R3 Residential – *Carried Forward***

The primary purpose of areas designated R3 Residential would be to provide a transition between rural and urban density development areas, and to provide for a suburban lifestyle on residential lots larger than those commonly found in suburban subdivisions. The maximum allowable density shall be 3.0 dwelling units per acre.

**r. R5 Residential – *Carried Forward***

The primary purpose of areas designated R5 Residential would be to provide for single-family detached housing on standard sized suburban lots. The maximum allowable density shall be 5.0 dwelling units per acre.

**s. R10 Residential – *Carried Forward***

The primary purpose of areas designated R10 Residential would be to provide for a variety of residential products and to encourage innovation in housing types. Developments within Residential 10 areas are typically expected to provide amenities not generally found in suburban subdivisions, such as common open space and recreational areas. The maximum allowable density shall be 10.0 dwelling units per acre.

**t. R15 Residential – *Carried Forward***

The primary purpose of areas designated R15 Residential would be to provide a range of multi-family housing types for those not desiring dwellings on individual lots that include amenities such as common open space and recreational facilities. The maximum allowable density shall be 15.0 dwelling units per acre.

**u. R20 Residential – *Carried Forward***

The primary purpose of areas designated R20 Residential would be to provide a range of high density multi-family housing types. Developments within R20 Residential areas shall also provide amenities, such as common open spaces and recreational facilities. The maximum density shall be 20 dwelling units per acre.

**v. R30 Residential – *Carried Forward (Moreno Valley Municipal Code 9.03.020.L)***

The primary purpose of the R30 Residential district would be to provide a broadened range of housing types in an urban setting than is typically found within other areas of the city. This district is intended as an area for development of multi-family residential dwelling units at a maximum allowable density of 30 dwelling units per net acre in accordance with the provisions outlined herein. (Ord. 797 § 2.2, 2009; Ord. 726 § 4.2, 2006; Ord. 547 § 1.1, 1999; Ord. 468 § 1.3, 1995; Ord. 359, 1992)

**3.2.2 Housing Element Update**

The Housing Element is a component of the General Plan that assesses the housing needs of all economic segments of the City's residents. Additionally, the Housing Element defines the goals and policies that will guide the City's approach to resolving those needs and recommends a set of programs that would implement policies over the next few years.

State law requires that all cities adopt a Housing Element and describe in detail the necessary contents of the Housing Element. The proposed Housing Element Update responds to those requirements and responds to the special characteristics of the City’s housing environment. The Housing Element Update incorporates the most current data and information readily available at the time of writing in 2020. The Housing Element Update has been prepared for the 2021-2029 planning period for jurisdictions in the Southern California Association of Governments (SCAG) region. It is designed to provide the City with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community.

### 3.2.2.1 Regional Housing Needs Assessment

Moreno Valley’s RHNA allocation for the 2021-2029 planning period has been determined by SCAG to be 13,627 housing units, including 3,779 units for very low-income households (combined with extremely low-income households), 2,051 units for low-income households, 2,165 units for moderate-income households, and 5,632 units for above moderate-income households. Table 3-2 shows Moreno Valley’s RHNA allocation for the 2021-2029 planning period.

Income Category (Area Median Income = AMI)	Units
Extremely Low-Income (0-30% of AMI)	1,890
Very Low-Income (31-50% of AMI)	1,889
Low-Income (51-80% of AMI)	2,051
Moderate-Income (81-120% of AMI)	2,165
Above Moderate-Income (more than 120% of AMI)	5,632
<b>Total New Construction Need</b>	<b>13,627</b>
SOURCE: SCAG 2021.	

### 3.2.2.2 Plan Organization

The chapters of the proposed 2021-2029 Housing Element Update are summarized as follows.

- **Chapter 1: Introduction.** This chapter discusses the purpose and contents of the Housing Element, including providing a profile of the community. A summary of the focus areas of key housing goals as well as new state legislation that has come into force since the prior Housing Element are also included. A recap of citizen participation that has informed the preparation of the Housing Element is provided.
- **Chapter 2: Housing Plan.** This chapter includes goals, policies, and programs related to the development of housing suitable to all income demographics in Moreno Valley. The goals and policies contained in the Housing Element address Moreno Valley’s identified housing needs and are implemented through a series of actions and programs. Housing programs define the specific actions the City will take to achieve specific goals and policies.

- **Chapter 3: Quantified Objectives.** This chapter establishes the number of housing units that the City will strive to construct, rehabilitate, and preserve over the planning period.
- **Chapter 4: Housing Needs Assessment.** This chapter examines general population and household characteristics and trends, such as age, race and ethnicity, employment, household composition and size, household income, and special needs. Characteristics of the existing housing stock are also addressed.
- **Chapter 5: Housing Constraints.** This chapter examines constraints to the development of housing suitable to all income groups in Moreno Valley (e.g., market, governmental, environmental, and infrastructure constraints).
- **Chapter 6: Housing Resources.** This chapter summarizes the available land, financial, and administrative resources available for the preservation, improvement, and development of housing in Moreno Valley. The analysis includes an evaluation of the availability of land resources and other important considerations for future housing development; the City's ability to satisfy its share of the region's future housing needs (RHNA), the financial resources available to support housing activities, and the administrative resources available to assist in implementing the City's housing programs and policies.
- **Chapter 7: Progress Report.** This chapter evaluates the goals, policies, and implementation actions/programs that were to be implemented during the previous planning period.

### 3.2.2.3 Key Goals/Policies

The 2021-2029 Housing Element Update carries forward the key goals/policies established in the prior 2014 Housing Element and is updated with a Housing Plan that reflects the needs of current and future Moreno Valley residents. The seven key goals of the Housing Element Update are listed below.

1. Availability of a wide range of housing by location, type of unit, and price to meet the existing and future needs of Moreno Valley residents.
2. Promote and preserve suitable and affordable housing for persons with special needs, including lower income households, large families, single-parent households, the disabled, senior citizens, and shelter for the homeless.
3. Removal or mitigation of constraints to the maintenance, improvement, and development of affordable housing, where appropriate and legally possible.
4. Provide increased opportunities for home ownership.
5. Enhance the quality of existing residential neighborhoods in Moreno Valley, through maintenance and preservation, while minimizing displacement impacts.
6. Encourage energy conservation activities in all neighborhoods.
7. Equal housing opportunity for all residents of Moreno Valley, regardless of race, religion, sex, marital status, ancestry, national origin, color, or handicap.

The 2021-2029 Housing Element reflects the City's commitment to creating a long range and viable Housing Element that looks ahead to the ongoing housing needs of its residents. Moreno Valley is a growing community and has a sufficient amount of land to accommodate new development. The 2021-2029 Housing Element meets Moreno Valley's RHNA allocation with a buffer in all income categories to ensure the City can navigate the no net loss provisions of the state Housing Element law and have continued ability to meet the RHNA by income group throughout the planning period. Furthermore, the 2021-2029 Housing Element includes programs to address new state requirements, including those related to Affirmatively Furthering Fair Housing (AFFH).

### 3.2.3 Climate Action Plan

The proposed CAP provides a comprehensive plan for addressing GHG emissions within the Planning Area. The proposed CAP was developed concurrently with the 2021 GPU and reflects that document's proposed land use and transportation strategy. The proposed CAP also evaluates how 2021 GPU goals and policies would affect future GHG emissions within the Planning Area.

The proposed CAP is intended to reinforce the City's commitment to reducing GHG emissions and demonstrate how the City would comply with state GHG emission reduction standards. As a Qualified GHG Reduction Strategy, the CAP would also enable streamlined environmental review of future development projects in accordance with CEQA. Specifically, the proposed CAP quantifies existing and projected GHG emissions generated by activities within the city and the region through horizon year 2040, and it includes GHG emissions reduction targets for the year 2040. The proposed CAP also contains actions that demonstrate the City's commitment to achieve state GHG reduction targets through monitoring and reporting processes to ensure that targets are met, and options for reducing GHG emissions beyond state requirements. If the proposed CAP is adopted, projects that demonstrate consistency with the 2021 GPU and CAP would be subject to a streamlined CEQA review process for mitigation of GHG emissions, pursuant to CEQA Guidelines Section 15183.5.

#### 3.2.3.1 Plan Organization

The chapters of the proposed CAP are summarized as follows.

- **Chapter 1: Executive Summary.** This chapter provides a brief summary of the CAP, including an overview of Moreno Valley's demographics and environmental setting, the scope and purpose of the proposed CAP, the planning process, findings from the GHG emissions forecast, and proposed GHG reduction strategies.
- **Chapter 2: Introduction.** This chapter describes the scope and purpose of the proposed CAP, provides an overview of climate change and GHGs, introduces the California GHG reduction legal framework and state and federal standards on GHG emissions, and describes the planning process and how the plan is intended to be used.
- **Chapter 3: Emissions Inventory.** This chapter describes the methodology used to calculate a baseline inventory of GHG emissions and identifies the major sources and

the overall magnitude of GHG emissions in Moreno Valley, pursuant to Sections 15183.5(b)(1)(A) and 15183.5(b)(1)(C) of the State CEQA Guidelines.

- **Chapter 4: Greenhouse Gas Reduction Targets and Forecasts.** This chapter describes the GHG reduction targets provided by state law and models forecasts of future GHG emissions through 2040. The chapter also quantifies GHG reductions from (1) state actions and (2) the 2021 GPU policies and actions, and applies these reductions to the emissions forecast.
- **Chapter 5: Greenhouse Gas Reduction Strategies.** This chapter provides a list of GHG reduction strategies that are required to meet GHG reduction targets and to provide a Qualified GHG Reduction Strategy for Moreno Valley. This chapter quantifies GHG reductions from CAP strategies and applies these reductions to the emissions forecast.
- **Chapter 6: Implementation and Monitoring.** This chapter describes steps to monitor progress and funding sources.

### 3.2.3.2 Planning Process

The proposed CAP reflects the City’s commitment to the core values presented in the 2021 GPU, and links elements of the plan with the goal of GHG reduction. The CAP was prepared in 2020 and 2021 by City staff and consultants, using public input collected during outreach activities conducted as part of the 2021 GPU process consistent with the requirements of the CEQA Guidelines, the California Air Resources Board (CARB) 2017 Scoping Plan, and state GHG targets established by Executive Order (EO) S-3-05 and Assembly Bill (AB) 32. Drafting of the proposed CAP involved the development of an emissions inventory describing direct GHG emissions from sources within the city, as well as indirect emissions associated with the consumption of energy generated outside of the city, using modeling tools, activity data, and emissions factors. The CAP generated GHG emissions forecasts through 2040 to determine whether buildout of the 2021 GPU would be consistent with state requirements, or if additional action would be required to meet GHG reduction targets.

### 3.2.3.3 GHG Reduction Targets

The CAP would need to demonstrate compliance with the statewide GHG target for 2030 (40 percent below 1990 levels per EO B-30-15), as well as for the 2021 GPU horizon year of 2040 (derived from 80 percent below 1990 levels by 2050 per EO S-3-05). The CAP would also need to demonstrate consistency with the 2017 CARB Scoping Plan, which provides guidance for local communities to meet AB 32 and EO S-3-05 targets.

Per CARB, local actions—such as general plans and climate action plans—are essential tools for the state to meet its GHG emission reduction goals. According to the 2017 Scoping Plan, local agencies should target total emissions of no more than six metric tons carbon dioxide equivalent (MTCO<sub>2</sub>E) per capita per year by 2030 and no more than two MTCO<sub>2</sub>E per capita by 2050 to be consistent with the 2017 Scoping Plan and the state’s long-term goals. The GHG emission targets established in the proposed CAP are based on the goals established by EO S-3-15 and SB 32 consistent with the CAP guidelines established in the 2017 Scoping

Plan. The proposed CAP established 2040 as the horizon year for analysis, consistent with the horizon year established in the 2021 GPU. Therefore, the proposed 2040 target of four MTCO<sub>2</sub>E per capita per year is determined using a linear trajectory in emissions reduction between 2030 and 2050.

### **3.2.3.4 Proposed CAP Measures**

The CAP projected that 2040 GHG emissions based on buildout of both the existing 2006 General Plan and the 2021 GPU would exceed standards established in CARB's 2017 Scoping Plan. Although buildout of the 2021 GPU would result in fewer GHG emissions compared to buildout of the existing 2006 General Plan, it would still exceed standards established in CARB's 2017 Scoping Plan. Under both buildout scenarios, the majority of GHG emissions are generated by the building (industrial, residential, and commercial) and transportation sectors. Additionally, projected GHG emissions associated with the building sectors would increase significantly in 2040 compared to existing conditions, while emissions associated with transportation would decrease and emissions associated with all other sectors would slightly increase.

Therefore, the proposed CAP developed a Qualified GHG Reduction Strategy that would reduce GHG emissions below the standards established in CARB's 2017 Scoping Plan. These strategies are organized by top contributing sectors in descending order and are quantified to measure GHG reduction potential. These strategies would serve to reduce GHG emissions associated with transportation, industrial, residential, commercial, water, public services and public lighting, and off-road equipment uses. The proposed CAP strategies are described in greater detail in Section 4.8 below.

## **3.2.4 Buildout Projections**

Buildout represents a reasonably foreseeable projection of the total number of residents, housing units, and jobs in the city in 2040 as a result of growth under the project. Buildout estimates should be considered a prediction for growth but not considered a guarantee, as the actual amount of development that would occur through 2040 is based on many factors outside of the City's control, including changes in regional real estate and labor markets and the decisions of individual property owners. Therefore, buildout estimates represent likely outcomes rather than definitive figures. Additionally, the designation of a site for a specific land use in the 2021 GPU does not guarantee that a site would be developed or redeveloped at the assumed density during the planning period, as future development would rely on each property owner's initiative and market forces.

SCAG has developed a set of regional projections for the year 2040 as part of its state-mandated Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Table 3-3 presents SCAG growth projections for population, households, and jobs within Moreno Valley through 2040. These projections provide a good gauge for the level of housing that would be needed to satisfy future RHNA beyond the 2021-2029 Housing Element Update cycle. By planning for housing development consistent with regional projections, the City

positions itself well for future RHNA cycles; planning for less could make it more challenging to satisfy RHNA in the future.

	Existing (2018)	SCAG Projected (2040)	Increment
Population	208,297	256,600	48,303
Households	52,008	73,000	20,992
Employment	44,331	83,200	38,869
SOURCE: SCAG 2016.			

### 3.2.4.1 Methodology Overview

To develop a reasonably foreseeable projection of housing and job growth for the planning period, a parcel-based analysis was conducted considering development potential and market demand factors. An overview of methodology for these projections is described below.

#### a. Opportunity Sites/Areas

Using Riverside County Assessor data from 2019, vacant and underutilized parcels were identified as opportunity sites, or places where change (i.e., new development or redevelopment) would be most likely to occur. Underutilized sites were defined as parcels with a low assessed value (AV) ratio, low FAR, or both. AV ratio is the ratio of the value of existing permanent improvements (i.e., buildings and structures) to the value of the land on which they sit. Where this ratio is less than one, a parcel may be considered underutilized. In other words, where the value of the land is worth substantially more than the value of the structures on it, there is an incentive for the owner to redevelop with new uses that command higher rents or sales prices. Another indicator that a site may be a candidate for redevelopment is low intensity of existing commercial development. Building intensity can be measured by calculating FAR, the ratio of building floor area to overall site area. A low FAR means that the square footage of buildings is small compared to the overall size of the site. Properties under City ownership were also taken into consideration. The clusters of vacant and underutilized parcels that were identified in this process were then used to develop the Concept Areas included in the 2021 GPU described in Section 3.2.1.2 above.

#### b. Pipeline Projects

The City provided a list of pipeline projects, which consists of reasonably foreseeable major development projects under review, recently approved, or currently under construction. Project details for these pipeline projects, including any new housing and non-residential development, were added to the parcel database. Buildout assumes that all pipeline development would occur during the planning period.



### c. Development Assumptions

New development is the increment of net new growth that would occur within the Planning Area, accounting for development on vacant sites as well as redevelopment that would demolish and replace existing structures. Opportunity sites were ranked in a tiering system by their existing conditions (i.e., AV ratio, FAR, vacant status, and location) and assigned a development potential, or amount of the parcel that is likely to undergo development during the planning period. This factor was applied to the size of each parcel to determine potential new developable area, as well as the number of existing buildings that would be redeveloped.

#### 3.2.4.2 Buildout Summary

Table 3-4 presents the projected project buildout through the horizon year of 2040. Table 3-4 shows that the project would develop approximately 22,052 new homes and approximately 51,000,000 square feet of non-residential uses, generating approximately 38,915 new jobs in Moreno Valley by 2040. SCAG regional projections are also presented for the purpose of comparison. As SCAG projects households and not residential units, a vacancy factor of 6 percent was applied to the 2040 SCAG household projections to convert to residential units. Similarly, as SCAG projects jobs and not square footage, employment density factors from a SCAG study of typical employment densities (jobs per square foot) were used to convert projected square footages to jobs to allow for comparison (The Natelson Company, Inc. 2001).

Concept Area	Residential Units			Employment		
	Low Density	Medium-High Density	Retail/Service	Office/R&D	Other/Commercial	Light Industrial
Downtown Center	1,320	5,524	400,000	1,450,000	1,500,000	-
CEMU (Centers)	-	1,311	1,088	136,208	172,317	-
COMU (Corridors)	-	5,524	39,809	14,794	64,413	-
World Logistics Center	-	-	-	200,000	-	40,400,000
Business Flex	-	-	1,178	3,572	-	64,288
Highway Office/Commercial	-	-	15,000	77,500	-	-
Outside Concept Areas	5,913	2,460	111,614	39,666	200,121	5,471,036
Subtotal	7,233	14,819	568,689	1,921,740	1,936,851	45,935,324
<b>TOTAL</b>	<b>Units</b>	<b>22,052</b>			<b>Sq. Ft.</b>	<b>50,362,604</b>
					<b>Jobs</b>	<b>38,915</b>
SCAG 2040 Net New		22,052				38,869
NOTE: Low density residential is generally 10 dwelling units per acre or less. Medium-high density residential is generally 11 dwelling units per acre or more.						
SOURCE: Dyett & Bhatia 2020b.						

Table 3-5 compares the existing residential units and employment square footage in 2018 with 2040 projections. A jobs-to-housing ratio is a metric that indicates the degree to which

residents of a community need to commute outside the city limits for work. In 2040, the projected jobs-to-housing ratio is improved to 1.07, whereas the 2018 ratio is 0.8.

**Table 3-5  
Citywide Buildout Summary**

	Residential Units			Employment			
	Low Density	Medium-High Density	Total Units	Commercial/Retail (sq. ft.)	Office (sq. ft.)	Light Industrial (sq. ft.)	Total Jobs
2018	45,922	9,406	55,328	6,525,678	465,215	5,824,148	44,331
2040	52,130	25,250	77,380	9,031,218	2,386,955	51,759,472	83,246
<b>Change</b>	<b>6,208</b>	<b>15,844</b>	<b>22,052</b>	<b>2,505,540</b>	<b>1,921,740</b>	<b>45,935,324</b>	<b>38,915</b>

SOURCE: Dyett & Bhatia 2020b.

The results of the buildout summary presented above were then utilized to compare projections for population, housing, and employment under buildout of the project to 2040 SCAG projections. Applying a vacancy rate of 6 percent to the projected 77,380 constructed housing units in 2040, it is estimated that the project buildout would result in 72,737 households. Table 3-6 presents a comparison of the 2040 SCAG projections to the projections for population, housing, and employment to what is projected under buildout of the project. As shown in Table 3-6, the projected project buildout of 72,737 households in 2040 would be less than the 2040 SCAG household projection of 73,000. Similarly, the project's projected population size of 252,179 would be less than the 2040 SCAG projection of 256,600. This difference in population is due to the greater share of multi-family units that would likely result under buildout of the project compared to buildout of the existing 2006 General Plan, as multi-family units typically have a lower household population. The project would slightly increase the number of jobs to 83,246 compared to the SCAG 2040 growth projection of 83,200.

**Table 3-6  
Comparison of 2040 SCAG to Project**

	SGAG Projected (2040)	Project (2040)	Increment
Population	256,600	252,179	-3,821
Households	73,000	72,737	-263
Employment	83,200	83,246	+46

### 3.3 Intended Uses of the EIR

This EIR examines the potential environmental impacts of implementing the project and identifies mitigation measures required to address significant impacts, as necessary. As no specific developments are proposed as part of the project, this EIR is a programmatic EIR and does not evaluate the potential project-specific environmental impacts of individual development proposals that may be allowed under the project subsequent to its adoption. Subsequent projects would be reviewed by the City for consistency with the project and this EIR, and adequate project-level environmental review would be conducted as required under CEQA.

This EIR is a programmatic EIR and does not evaluate the impacts of specific, individual developments that may be allowed under the 2021 GPU. Specific future projects may require separate environmental review to address project-specific impacts, as required by CEQA, to secure the necessary discretionary development permits. Therefore, while subsequent environmental review may be tiered from this EIR,<sup>1</sup> this EIR is not intended to address impacts of individual projects. Subsequent projects would be reviewed by the City for consistency with the proposed General Plan and this EIR. Subsequent project-level environmental review would be conducted as required by CEQA.

### **3.4 Related Environmental Review and Consultation Requirements**

Implementation of the project would require additional regulatory actions to be taken by the City, including amendments to the Zoning Code to ensure consistency. The project would require a recommendation from the Planning Commission and adoption by the City Council, for approval of both the 2021 GPU as well as zoning implementation. The Housing Element will require certification by the state Department of Housing and Community Development. Future, subsequent development under the project may require approval of federal, state, and responsible or trustee agencies that may rely on this programmatic EIR for decisions in their areas of expertise.

### **3.5 Documents Incorporated by Reference**

Consistent with CEQA Guidelines Section 15150,<sup>2</sup> this Draft EIR incorporates the following documents by reference:

- World Logistics Center Specific Plan (Adopted August 25, 2015)
- World Logistics Center Specific Plan Revised Final EIR, April 2020 (State Clearinghouse No. 2012021045)

Where portions of the documents are relevant to the analysis in this EIR, the incorporated part of the referenced documents is briefly summarized. In compliance with CEQA Guidelines Section 15150, the documents listed are available to the public at the City of Moreno Valley Community Development Department.

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<sup>1</sup>Section 15385 of the CEQA Guidelines describes “tiering” as “the coverage of general matters in broader EIRs (such as on general plans or policy statements) with subsequent narrower EIRs or ultimately site-specific EIRs incorporating by reference the general discussions and concentrating solely on the issues specific to the EIR subsequently prepared.”

<sup>2</sup>Under CEQA Guidelines Section 15150, an EIR may incorporate by reference all or portions of another document that is a matter of public record or generally available to the public. The incorporated text shall be considered to be set forth in full as part of the EIR.



## **Chapter 4**

# **Environmental Analysis**

Chapter 4.0, Environmental Analysis provides a programmatic analysis of the environmental impacts associated with implementation of the goals, policies, and actions and the projected buildout of the MoVal 2040 Project (project), which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the entire city of Moreno Valley and sphere of influence, which are collectively referred to as the Planning Area. Within the analysis, Concept Areas refer to those areas where the GPU proposes land use changes as shown on Figure 3-1.

### **Topics Analyzed**

The following environmental topics from the CEQA Guidelines Appendix G are evaluated in Section 4.1 through 4.18:

- 4.1 Aesthetics
- 4.2 Agriculture and Forestry Resources
- 4.3 Air Quality
- 4.4 Biological Resources
- 4.5 Cultural and Tribal Cultural Resources
- 4.6 Energy
- 4.7 Geology/Soils
- 4.8 Greenhouse Gas Emissions
- 4.9 Hazards & Hazardous Materials
- 4.10 Hydrology/Water Quality
- 4.11 Land Use/Planning
- 4.12 Mineral Resources
- 4.13 Noise
- 4.14 Population/Housing
- 4.15 Public Services and Recreation
- 4.16 Transportation
- 4.17 Utilities/Service Systems
- 4.18 Wildfire

## Type of EIR

Consistent with Section 15168 of the California Environmental Quality Act (CEQA) Guidelines, this Draft Environmental Impact Report (EIR) provides a programmatic analysis of the environmental impacts associated with implementation of the goals, policies, actions, and projected buildout of the project. A program-level environmental review document is prepared when a project consists of a series of actions that are characterized as one large project through reasons of geography, similar rules or regulations, or where individual activities will occur under the same regulatory process with similar environmental impacts that can be mitigated in similar ways. As described in Section 15168 of the CEQA Guidelines, program-level environmental review documents are appropriate when a project consists of a series of actions related to the issuance of rules, regulations, and other planning criteria. The project that is the subject of this EIR consists of long-term plans that will be implemented as policy documents guiding future development activities and City of Moreno Valley (City) actions. Therefore a program-level EIR is appropriate.

In accordance with CEQA Guidelines Section 15168, a program-level EIR may serve as the EIR for subsequent activities or implementing actions, provided it contemplates and adequately analyzes the potential environmental impacts of those subsequent projects. If, in examining future actions for development within the proposed project areas, the City finds no new effects could occur or no new mitigation measures would be required other than those analyzed and/or required in this program-level EIR, the City can approve the activity as being within the scope covered by this program-level EIR, and no new environmental documentation would be required. If additional analysis is required, it can be streamlined by tiering from this program-level EIR pursuant to CEQA Guidelines Sections 15152, 15153, 15162, 15163, 15164, 15168, and 15183 (e.g., through preparation of a Consistency Determination, Mitigated Negative Declaration, Addendum, or Supplemental or Subsequent EIR).

## Cumulative Impacts

CEQA Guidelines Section 15130 provides that “An EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable,” as defined in Guidelines Section 15065(a)(3). Cumulatively considerable means “the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects” (14 California Code of Regulation 15065.) The discussion of cumulative impacts is contained within each subsection. In general, the cumulative analysis approach is based on a summary of projections as specified in CEQA Guidelines Section 15030(b)(1)(B). This approach is appropriate due to the nature of the project which is based on projections for buildout of the 2021 GPU. Additionally, the CAP is based on a summary of greenhouse gas reduction projections over time. Applicable modeling used to support cumulative analysis conclusions is referenced in the subsections as appropriate.

## 4.1 Aesthetics

This section analyzes impacts to visual resources that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan. The analysis area covers the entire city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area. This analysis relies on secondary source information including maps and historical records.

### 4.1.1 Existing Conditions

The total area of land in the Planning Area is approximately 42,900 acres or 67 square miles, of which 33,000 acres are within the city. Land outside of the city but within the sphere of influence is largely undeveloped natural open space.

#### 4.1.1.1 Significant Features

##### a. Viewsheds and Scenic Vistas

A viewshed is generally defined as an area that can be seen from a given vantage point and viewing direction. A viewshed is composed of foreground items (items closer to the viewer) that are seen in detail and background items (items at some distance from the viewer) that frame the view.

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

Moreno Valley is located in Riverside County in an east-west oriented valley bordered by the Box Spring Mountain Range to the north, the Badlands Mountain Range, also known as San Timoteo Badlands, to the northeast, and the Bernasconi Hills with Lake Perris to the southeast. Moreno Valley connects to the San Jacinto Valley in the southeast between the Badlands Mountain Range and Bernasconi Hills. To the west, lower hill ranges including Sycamore Canyon are located between the cities of Riverside and Perris, and the Saddleback formation, which is part of the Santa Ana Mountain Range, lies further in the west beyond Lake Mathews. These topographic features provide numerous scenic vistas within the Planning Area.

The principal scenic resources in the Planning Area are all visible from State Route 60 (SR-60), a major regional east-west transportation corridor. Upon entering Moreno Valley from the west, the dominant view is of Box Springs Mountain to the immediate north and the Bernasconi Hills to the south. Both mountain ranges display numerous rock outcroppings and boulders that add visual character to these landforms. Moreno Peak is part of a prominent landform located within the city limit, south of SR-60 along Moreno Beach Drive. This landform only rises a few hundred feet above the valley floor but has a unique location near the center of the valley. Moreno Beach Drive, the main route to Lake Perris from SR-60, offers views of Moreno Peak and a panoramic view of Moreno Valley.

At the eastern edge of the city, SR-60 passes through the Badlands area, characterized by steep and eroded hillsides. Expanses of open land are found throughout this portion of the Planning Area and these tracts of land allow for uninterrupted scenic vistas from SR-60, Gilman Springs Road and other roadways and provide views of the San Jacinto Valley and the ephemeral Mystic Lake. Views of the San Bernardino and San Gabriel mountains are evident at times from the valley floor. Winter snows in the San Bernardino and San Jacinto Mountains often provide a striking view.

Within the city, several hills and rock formations present natural landmarks, particularly on the eastern part of the city between Moreno Beach Drive and Nason Street, just south of the SR-60, at Alessandro Boulevard and Lasselle Street, and along the northern edge of the city near Ironwood Avenue. The terrain gradually slopes from north to south, starting from the northern mountain range to the southern border of the city with an elevation change of approximately 300 feet between SR-60 and Iris Avenue. The nearest mountain ranges, as well as the more distant San Bernardino Mountains, Santa Ana Mountains, and San Gabriel Mountains, are visible from many locations in the Planning Area, particularly higher elevations in the city. A notable landmark is the 3,083-foot-tall Box Springs Mountain on the northeast side of Moreno Valley, which features a prominent “M” marker at its peak facing Moreno Valley. The “M” is lit at night during holidays and special events.

## **b. Structure and Urban Form**

Moreno Valley’s structure, its physical form, is based on the north-south and east-west oriented one-square-mile gridiron plan laid out at the end of the nineteenth century as part of the settlement expansion to the American West. Much of this layout remains with some modifications, resulting in “superblocks” defined by major arterial roads. Most of Moreno Valley is organized in half-mile squares that are sometimes divided in half or four quarters by continuous roads, while some half-mile squares contain an irregular street grid within. One-mile squares or even larger blocks exist on the east side of the city.

A finer-grained urban fabric with a smaller street grid exists in the Sunnymead and Edgemont area, where Moreno Valley’s development first started. The grid structure is broken up to follow the natural topography at the Lake Perris area in the southeast and along the northern hills and mountains. Although not located within the city limits, March Air Reserve Base/Inland Port Airport (MARB/IPA) is located immediately adjacent to the southwestern boundary of the city and the street grid ends at the Base’s northern and eastern

boundary. SR-60 traverses Moreno Valley in an east-west direction with most of the city located on the south side of the highway.

The city has a decentralized structure with commercial, retail, public, and institutional uses distributed across the Planning Area, typically located along major arterials and at intersections of major arterials. Large-scale retail centers are concentrated along SR-60, with smaller neighborhood retail centers interspersed throughout the city fabric. Residential uses are spread out within the grid pattern, mainly consisting of single-family home subdivisions, some older small parcel residential areas, as well as a number of multi-family complexes. Light Industrial areas are located along the southern boundaries near the MARB/IPA and south of SR-60 on the east side of the city and are home to a variety of industries including large-scale distribution centers.

Large areas of vacant land are located on the city's east side beyond Lasselle Street. Here, some areas still remain rural in character with stand-alone buildings or compounds accessed by narrow roads, which in some cases are unpaved roads. Open land, a limited amount of which is used for agriculture, is lining Gilman Springs Road at the eastern edge of the city.

Major open spaces are the Lake Perris Recreation Area at the southern edge of the city along the Bernasconi Hills and the Box Spring Mountain Reserve Park in the northwest. A unique feature is Juan Bautista de Anza Multi-Use Trail, formerly named Aqueduct Trail, which runs diagonally through the western part of the city along the underground California Aqueduct Pipeline from the Moreno Valley Mall to Lake Perris State Park.

The City was formed in 1984, uniting the unincorporated communities of Sunnymead, Moreno, and Edgemont, during a time of significant growth. The regular street grid and amount of available land resulted in auto-oriented low-density development. Large single-family residential subdivisions were built in or within a portion of the half-mile square blocks or along the hillsides. Interspersed auto-oriented neighborhood retail centers serve these communities and are located along major four- or six-lane arterials. In the business and industrial areas, very large distribution centers and warehouses with building footprints between 1 and 1.5 million square feet are common. Existing structures within the Planning Area consist primarily of auto-oriented low-density development. With the exception of medical facility buildings, most buildings in Moreno Valley are one or two stories high, with some multi-family buildings or hotels going up to four stories. Large distributions centers have building heights of up to 50 to 60 feet and building lengths between 600 and 900 feet. The most significant source of light and glare occurs from artificial lights from buildings, including MARB/IPA in the southwestern portion of the Planning Area.



### **c. Historic Resources**

Historic Resources are evaluated in Section 4.5, Cultural and Tribal Cultural Resources. A description of each of these resources is provided in Table 4.5-1, and the locations of each of these resources is presented in Figure 4.5-1. Of the 48 historic resources that were identified within the Planning Area, the following were determined to be significant:

- Old Moreno School (P-33-007278) – listed as a California Point of Historical Interest.
- Two single-family properties (P-33-007287 and P-33-007288) – recommended eligible at the local level.
- Three single-family properties (P-33-007284, P-33-007286, and P-33-007289) and one multi-family property (P-33-007285) – recommended eligible for the NRHP.
- First Congregational Church – Listed as significant in the existing 2006 General Plan.

## **4.1.2 Applicable Regulatory Requirements**

### **4.1.2.1 Federal**

#### **a. Federal Aviation Administration**

The Federal Aviation Administration (FAA) requires that any temporary or permanent structures exceeding an overall height of 200 feet above ground level be marked and/or lighted. While development associated with the project is not anticipated to exceed 200 feet in height, the FAA may also recommend marking and/or lighting of a structure that does not exceed 200 feet above ground level because of the particular location of a structure. MARB/IPA is located immediately adjacent to the southwestern boundary of the city and may trigger necessary notification of the FAA to ensure that proposed structures do not affect navigable airspace.

### **4.1.2.2 State**

#### **a. The California Scenic Highways and Historic Parkways Program**

The California Scenic Highways and Historic Parkways Program was created in 1963 to preserve and protect highway corridors located in areas of outstanding natural beauty from changes that would diminish the aesthetic value of the adjacent lands. The California Department of Transportation (Caltrans) maintains its State Scenic Highways and Historic Parkways Program, through which segments of the state highway system are designated as being of particular scenic value or interest. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. Interstates, state highways, byways, and parkways are eligible for designation or

for recognition as eligible for designation. The program is governed by the regulations found in the California Streets and Highways Code, Section 260 et seq.

California Streets and Highway Code Section 261 requires local government agencies to take the following actions to protect the scenic appearance of the scenic corridor:

- Regulate land use and density of development;
- Provide detailed land and site planning;
- Prohibit off-site outdoor advertising and control of on-site outdoor advertising;
- Pay careful attention to and control of earth moving and landscaping; and
- Scrutinize the design and appearance of structures and equipment.

California Streets and Highway Code Section 263 allows the California State Legislature the authority to identify highways as eligible for designation as a scenic highway. The government with jurisdiction over land abutting a highway considered to be scenic is required to adopt a “scenic corridor protection program” that restricts development, outdoor advertising, and earth moving activities along the affected segment or corridor (“Corridor Protection Program”). Caltrans must also indicate that the highway segment meets established criteria in order for the roadway or segment to be designated as scenic.

There are no state-designated or eligible scenic highways in the Planning Area. The closest eligible state scenic highway is State Route 74 (SR-74), located approximately 8 miles south of the Planning Area, and the nearest officially designated segment of a state scenic highway is a portion of SR-74 located approximately 20 miles southeast of the Planning Area (Caltrans 2017a).

## **b. California Building Standards Code**

Title 24 of the California Building Standards Code serves as the basis for the design and construction of buildings in California. In addition to safety, sustainability, new technology and reliability, the California Building Standards Code addresses light pollution and glare hazards through the establishment of maximum allowable backlight, up light, and glare (BUG) ratings.

### **4.1.2.3 Local**

#### **a. County of Riverside General Plan**

Foothills and mountainous areas are visible from many locations within the county of Riverside (county) and create a varied visual background within many local communities, including Moreno Valley. The County of Riverside General Plan (CRGP) acknowledges that hillside development requires careful siting, grading, and/or design measures to maintain and enhance the scenic quality of the county’s aesthetic resources. The CRGP identifies the importance of the county’s natural visual resources, including low-lying valleys, mountain ranges, rock formations, rivers, and lakes, and acknowledges that views of these features are frequently experienced by travelers along the county’s roadways. The CRGP more specifically addresses the regulation of scenic corridors within the Circulation, Land Use, and

Multipurpose Open Space elements. The CRGP Circulation Element officially recognizes several county roadways as either Eligible or Designated State or County Scenic Highways. However, there are no Eligible or Designated State or County Scenic Highways within the Planning Area.

The CRGP Land Use Element includes goals, objectives, and policies aimed at hillside protection to ensure that the design and appearance of proposed landscaping, structures, equipment, signage, and grading are compatible with the surrounding visual setting, and to provide long-term protection of the county's hillsides as an important aesthetic resource. The Land Use Element identifies various policies, in order to conserve significant scenic resources along designated scenic highways for future generations and to manage development along scenic highways and corridors so as not to detract from the area's scenic quality.

## **b. City of Moreno Valley Municipal Code**

Title 9 of the Municipal Code contains design guidelines that regulate the aesthetic quality of new development with respect to structures, signs, walls, landscaping and other improvements.

Chapter 9.08 General Development Standards, Section 9.08.100 Lighting establishes regulations and standards for outdoor lighting which will reduce light pollution and trespass generated by residential and nonresidential lighting fixtures and devices, while maintaining dark skies.

Chapter 9.10 Performance Standards provides standards for proposed development projects that may impact the surrounding neighborhood. Municipal Code Section 9.10.110 regulates light and glare by providing that no sign or lighting fixture shall create illumination which exceeds 0.5 foot candles minimum maintained on any adjacent property, whether the illumination is direct or indirect light from the source. Additionally, it is required that all lighting be designed to project down-ward and not create glare on adjacent properties.

Chapter 9.16 Design Guidelines contains design guidelines intended to promote quality site planning to ensure compatibility of surrounding development, while encouraging variety and distinctiveness in design and architectural styles. Municipal Code Section 9.16.020 specifies design principles relating to urban design, site planning, architecture, landscaping, lighting and sign design.

Chapter 9.17 Landscape and Water Efficiency Requirements identify landscape design issues and provide standards to create aesthetic and water conserving landscape areas. These requirements apply to landscape development in public rights-of-way, areas adjacent to the public right-of-way, easements, setbacks, slopes, parking areas, public, quasi-public, commercial, industrial and specified residential on-site landscape areas.

### 4.1.3 Methodologies for Determining Impacts

The visual resource analysis is based on field review of the Planning Area and review of topographic conditions. Any evaluation of visual impacts is necessarily subjective; however, community aesthetic values can be used to evaluate changes in views within a particular community. These values are found in General Plan policies, zoning ordinances, and, where specific policies are absent, general design theory and visual analysis methods can be incorporated to evaluate aesthetic impacts.

### 4.1.4 Basis for Determining Significance

Thresholds used to evaluate impacts related to aesthetics are based on applicable criteria in the CEQA Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact related to aesthetics would occur if the project would:

- 1) Have a substantial adverse effect on a scenic vista;
- 2) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway;
- 3) 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 points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or
- 4) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area.

### 4.1.5 Impact Analysis

#### 4.1.5.1 Topic 1: Scenic Vistas

*Would the project have a substantial adverse effect on a scenic vista?*

The Planning Area is surrounded by mountain and hillside terrain that offer scenic vistas, the view of which are available throughout the Planning Area and major roadways. Implementation of the project would result in new development and redevelopment throughout the Planning Area that may detract from the existing scenic vistas. Additionally, new infrastructure such as road improvements, could interrupt or detract from a scenic vista. Future development and redevelopment would be focused into Concept Areas that primarily consist of vacant and underutilized parcels of land. However, many hillside areas, excluding the hillsides reserved for open space uses, would also be developed with low density residential uses. The valley floor would also be developed into a mixture of residential and nonresidential uses. Such views might be more or less aesthetically appealing depending on the nature of the resulting structures, walls, and how those properties are maintained.

Overall, because development could result in changes to the existing patterns of development and scenic opportunities, future development and redevelopment would have the potential to result in an impact to scenic vistas.

Future development and redevelopment would be required to adhere to relevant portions of the Municipal Code including Chapter 9.6 Design Guidelines which includes specific design and architectural guidelines applicable to new development (and remodeled development). Overall, these design guidelines function as a tool to ensure future projects would be compatible with the character and design of surrounding land uses. Additionally, this section of the Municipal Code includes design guidelines requiring that views are not blocked and scenic vistas are maintained. Specifically, design principals apply to mass, scale, proportion, texture, color, light and shade, solid to void, and unity/diversity (Municipal Code Section 6.16.020(A)). Additional guidelines are included to preserve hillsides (Municipal Code Section 9.16.235) and ensure future projects fit into their surroundings and are compatible with General Plan design policies (Municipal Code Section 9.16.110). All future development and redevelopment would be required to adhere to the proposed goals, policies, and actions included in the Open Space and Resource Conservation Element (OSRC) Element of the 2021 GPU.

### ***Goal***

OSRC-2: Preserve and respect Moreno Valley's unique cultural and scenic resources, recognizing their contribution to local character and sense of place.

### ***Policies***

OSRC.2-1 Limit development on hillsides and ridgelines where structures interrupt the skyline.

OSRC.2-2 Incorporate significant rock formations into the design of hillside developments.

OSRC.2-3 Minimize alteration of the topography, drainage patterns and vegetation of land with slopes of ten percent or more and maintain development standards to protect the environmental and aesthetic integrity of hillside areas.

OSRC.2-4 Reduce or avoid visual intrusion from energy and telecommunications infrastructure. Encourage the undergrounding of utility lines wherever feasible and promote the use of "stealth" designs that locate wireless infrastructure on existing poles, buildings and other structures.

OSRC.2-5 Recognize Gilman Springs Road, Moreno Beach Drive, and State Route 60 as local scenic roads and provide large setbacks from scenic roads, as possible, to avoid encroachment of buildings on scenic views of the surrounding mountains. The view of Mystic Lake from Gilman Springs Road should also be protected.

OSRC.2-6 The use of natural materials such as stone, brick, and wood is preferable to metal posts and rails for roadside appurtenances along local scenic roads.

- OSRC.2-7 Ensure any signage along local scenic roads does not detract from the area's scenic character.
- OSRC.2-8 Require cultural resource assessments prior to the approval of development proposals on properties located in archaeologically sensitive areas.

### **Actions**

- OSRC.2-A Update the Municipal Code to require a Hillside Development Permit as part of a proposed subdivision, for proposed development or new land use on that portion of a site with a slope of 10 percent or greater.
- OSRC.2-B Maintain a map of sensitive archaeological sites in Moreno Valley and use it to inform project applicants of the need for cultural resource assessments.

As described above, the OSRC Element includes goals and policies to limit development on hillsides and ridgelines where structures interrupt the skyline, avoid encroachment of buildings on scenic views of the surrounding mountains, and preserve the view of Mystic Lake from Gilman Springs Road. Therefore, adherence to applicable Municipal Code design requirements and 2021 GPU policies would ensure that future development would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant.

#### **4.1.5.2 Topic 2: Scenic Resources**

*Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway?*

As described in Section 4.1.2.2.a above, there are no state-designated or eligible scenic highways within the Planning Area. The closest eligible state scenic highway is SR-74, located approximately 8 miles south of the Planning Area, and the nearest officially designated segment of a state scenic highway is a portion of SR-74 located approximately 20 miles southeast of the Planning Area (Caltrans 2017). Future development within the Planning Area would not be located within the viewshed of SR-74, including the segment designated as a state scenic highway. Therefore, the project would not project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway. No impact would occur.

#### **4.1.5.3 Topic 3: Visual Character or Quality**

*In non-urbanized areas, would the project 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 points). In an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

### **a. Construction Related Visual Quality Impacts**

Implementation of the project would result in construction activities throughout the Planning Area. Temporary construction activities would involve the use of heavy machinery that would be visible from the immediately surrounding areas. These could degrade the existing visual character and quality of the respective development sites and their surroundings during the construction phase.

All project-related construction activities would be temporary in nature and all construction equipment would ultimately be removed from individual project sites following completion of construction activities. Therefore, changes to local visual character and quality associated with construction of future development would be temporary, and impacts would be less than significant.

### **b. Post Development Visual Quality Impacts**

Future development and redevelopment would be focused into Concept Areas that primarily consist of vacant and underutilized parcels of land. This would result in an intensification of uses in previously developed urbanized areas of the community. In the northern and eastern parts of the city, the project would generally maintain existing land use designations that allow for low density residential development, commercial development, and industrial development on vacant land (see Figure 3-2). Development in the eastern part of the city north of SR-60 would primarily consist of low density housing at between 0.4 and 5 dwelling units per acre, consistent with existing land use and zoning regulations and the scale of existing development in the vicinity. Proposed 2021 GPU Action LU-3.F calls for the establishment of residential design guidelines for single-family neighborhoods which will help ensure compatibility of new development with the existing context. Within the proposed Highway Office/Commercial designation, a new employment campus with office and accessory commercial uses is envisioned and the designation specifically states that "the architectural style of development should blend to the rural character intended for the surrounding area." Proposed 2021 GPU policies pertaining to this area would reinforce this requirement and call for the incorporation of scenic views of surrounding hills into new development.

Land within the proposed Downtown Center designation is largely vacant under current conditions, although prominent existing development includes the Riverside University Medical Center and the Kaiser Permanente Medical Center, as well as some residential development. This proposed Concept Area would see significant new commercial, retail, office, recreational and residential development, as well as new roadways and bicycle and pedestrian facilities to create a vibrant central business district for the city and focal point for residents and visitors. Pursuant to proposed GPU Policy LU-2.2, new development in the Downtown Center would be required to prepare an area plan, master plan, or site plan demonstrating consistency with principles established in the 2021 GPU for land use, transportation, and open space and the illustrative buildout projections for the area. Policies in the proposed 2021 GPU also call for high-quality architectural standards, a variety of building types and scales to create a distinct identity, and the incorporation of public art.

Similarly, the proposed Center Mixed Use and Corridor Mixed Use designations would facilitate significant new residential and commercial development, including mid to high density housing between 15 and 25 dwelling units per acre in the corridors, and up to 30 dwelling units per acre in the centers. As underutilized parcels and surface parking lots are redeveloped, policies in the proposed 2021 GPU would promote entrances to new buildings along the street frontage to activate the pedestrian realm; result in streetscape improvements along the corridors that would see the addition of bicycle lanes and landscaped buffers along the sidewalks; and call for the City to explore options for encouraging new “People Places” such as public plazas with seating, art, play features near shopping and business districts including outdoor areas, and encouraging restaurants to create sidewalk outdoor seating areas to activate sidewalks.

Once the proposed plan is approved by the City Council, the Planning and Zoning Code and other City regulations would be updated for consistency with the approved Plan, thereby eliminating any conflicts. Furthermore, architectural palettes of future development would be required to be designed for compatibility with surrounding land uses, and all future development would adhere to landscaping requirements specified in Municipal Code Chapter 9.17 that sets forth requirements for landscape design. Adherence to these requirements would enhance the aesthetic quality of future development and create visual continuity with surrounding land uses. The landscape regulations detail design standards applicable to turf areas, shrubs and tree, and wall treatments for all types of development including streetscapes, parking areas, residential, and commercial landscape plans. In addition to requiring water efficient landscape plans, the regulations require individual projects to complement surrounding areas whether within fully developed or adjacent to open space. Therefore, adherence to applicable 2021 GPU policies and Municipal Code requirements would ensure that future development would not degrade the existing visual character or visual character or quality public views of the site and its surroundings or conflict with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant.

#### **4.1.5.4 Topic 4: Light or Glare**

*Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Implementation of the project may introduce new sources of daytime glare and may change nighttime lighting and illumination levels.

Lighting nuisances typically are categorized by the following:

- 1) Glare – Intense light that shines directly, or is reflected from a surface into a person’s eyes;
- 2) “Skyglow”/Nighttime Illumination – Artificial lighting from urbanized sources that alters the rural landscape in sufficient quantity to cause lighting of the nighttime sky and reduction of visibility of stars and other astronomical features; and



- 3) “Spillover” Lighting – Artificial lighting that spills over onto adjacent properties, which could interrupt sleeping patterns or cause other nuisances to neighboring residents.

The main sources of daytime glare in the Planning Area are from sunlight reflecting from structures with reflective surfaces such as windows. A source of glare during the nighttime hours is artificial light. Future development would include residential and commercial uses containing structures and other potential sources of light and glare both during the day and at night. Building materials (i.e., reflective glass and polished surfaces) are the most substantial sources of glare. The amount of glare depends on the intensity and direction of sunlight, which is more acute at sunrise and sunset because the angle of the sun is lower during these times. The sources of new and increased nighttime lighting and illumination include, but are not limited to, new residential development, lighting from non-residential uses, lights associated with vehicular travel (i.e., car headlights), street lighting, parking lot lights, and security related lighting for nonresidential uses. Increased nighttime lighting and illumination could result in adverse effects to adjacent land uses. Title 24 of the California Building Standards Code serves as the basis for the design and construction of buildings in California. In addition to safety, sustainability, new technology and reliability, the California Building Standards Code addresses light pollution and glare hazards through the establishment of maximum allowable BUG ratings (State of California 2011). Future development would also be required to adhere to Municipal Code Section ~~9.08.110~~9.08.100 which addresses citywide night lighting standards. Among other things, it requires non-residential lighting to be fully shielded and directed away from surrounding residential uses. It also restricts non-residential lighting to not exceed 0.25 foot-candle of light measured from within five feet of any property line (Municipal Code Section 9.08.100 C.3.a). Therefore, adherence to applicable state building standards and Municipal Code regulations aimed at protecting against the effects of light and glare on day and nighttime views in the Planning Area would ensure that future development would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and impacts would be less than significant.

### 4.1.6 Cumulative Analysis

The geographic scope of the cumulative impact analysis for aesthetics includes the immediate vicinity of view corridors, view sheds, or scenic resources in the city. Future development would be required to adhere to all relevant local plans, Municipal Code regulations and proposed policies contained in the updated elements of the 2021 GPU. Specifically, design standards, landscape plans, and light regulations would be applied to all project specific development.

New development would be reviewed on a project-by-project basis, in order to ensure each city’s development standards are met and new development is compatible with its existing surrounding area and visually compatible with existing land uses. Therefore, the project would not contribute to a cumulative impact related to aesthetics.

### **4.1.7 Significance of Impacts before Mitigation**

With respect to all issues discussed under Section 4.1.5, compliance with local plans, the city's Municipal Code requiring standards design measures, and proposed 2021 GPU policies would be required. As future development would be consistent with all relevant regulations, impacts related to aesthetics would be less than significant.

### **4.1.8 Mitigation**

Impacts would be less than significant. No mitigation is required.

### **4.1.9 Significance of Impacts after Mitigation**

Impacts would be less than significant. No mitigation is required.

## 4.2 Agriculture and Forestry Resources

This section analyzes potentially significant impacts related to agriculture and forest resources that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the entire city of Moreno Valley (city) and the sphere of influence (SOI), which are collectively referred to as the Planning Area. Within the analysis, Concept Areas refer to those areas where the GPU proposes land use changes as shown on Figure 3-1. This analysis relies on secondary sources and farmland mapping data from the California Department of Conservation (CDC).

### 4.2.1 Existing Conditions

The Planning Area has a long history of agricultural use dating back to when Moreno Valley was originally settled in the 1850s. However, a variety of economic factors have caused farming to decrease substantially over recent decades. The high cost of land, the high cost of water and energy, fragmented ownership patterns, and market conditions limit the potential return on investment, which have combined to disincentivize the continuation of agricultural production within the Planning Area. Consequently, urban development has encroached on agricultural land within the Planning Area over time, and it is no longer a strong component of the city's economy.

The Conservation Element of the City's 2006 General Plan identified agricultural production as an interim use. Objective 4.1 of the 2006 General Plan states that while the City should "retain agricultural open space as long as agricultural activities can be economically conducted, and are desired by agricultural interests," the City should also "provide for an orderly transition of agricultural lands to other urban and rural uses" (Moreno Valley 2006a). Due to the anticipated continuation of economic factors that would disincentivize agricultural production within the Planning Area, the 2006 Final EIR determined that impacts to agricultural resources would be significant and unavoidable (Moreno Valley 2006b). Since adoption of the 2006 General Plan, agricultural uses have continued to decrease within the Planning Area. No land within the Planning Area is designated as Agriculture on the City's existing land use map, and remaining farming uses in the Planning Area are limited to intermittent farming activities north of State Route 60 (SR-60) in the northeast portion of the city.

## 4.2.2 Applicable Regulatory Requirements

### 4.2.2.1 Farmland Mapping and Monitoring Program

The CDC, Division of Land Resource Protection, identified important farmland throughout the state through its Farmland Mapping and Monitoring Program (FMMP). The FMMP is non-regulatory and was developed to inventory land and provide categorical definitions of important farmlands and consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. The program does not necessarily reflect local General Plan actions, urban needs, changing economic conditions, proximity to market, and other factors, which may be taken into consideration when government considers agricultural land use policies. The FMMP periodically prepares *Important Farmland Maps*, which are a hybrid of resource quality (soils) and land use information intended to document the suitability of land for agricultural production.

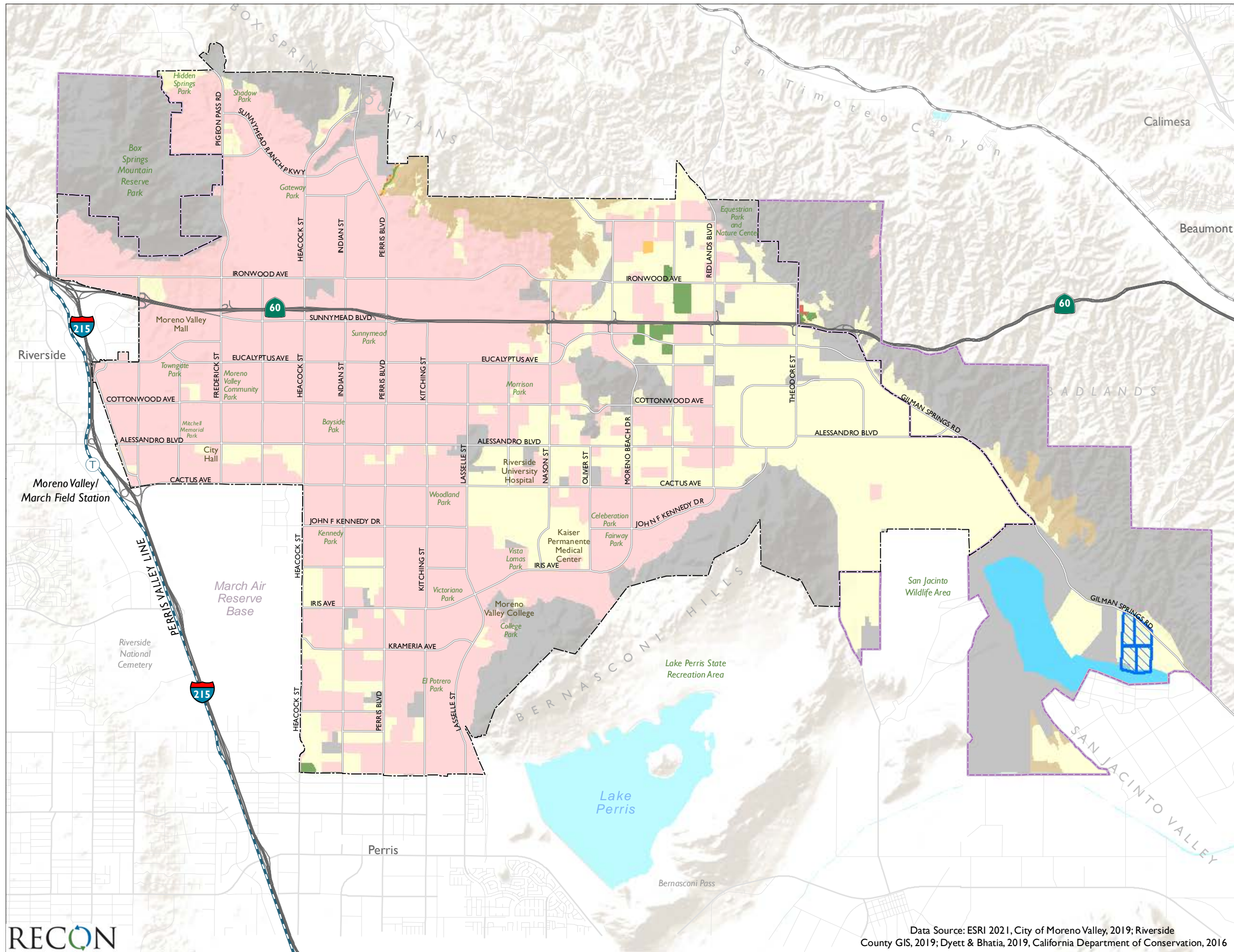
The last update for Riverside County that was completed reflects land use changes to agriculture, through the year 2016. Figure 4.2-1 presents the distribution of FMMP resources within the Planning Area. These include lands designated as Prime and Unique Farmlands, Farmland of Statewide and Local Importance, Grazing Land, Urban and Built-Up, and Other Land. A description of each of these categories is provided below.

#### a. Prime Farmland

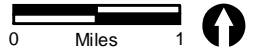
Prime Farmland has the most favorable combination of physical and chemical features, enabling it to sustain long-term production of agricultural crops. This land possesses the soil quality, growing season, and moisture supply needed to produce sustained high yields. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to Natural Resources Conservation Service (NRCS) mapping. The Planning Area contains approximately 157.0 acres of Prime Farmland.

#### b. Farmland of Statewide Importance

Farmland of Statewide Importance is similar to Prime Farmland; however, it possesses minor shortcomings, such as greater slopes and/or less ability to store moisture. In order to qualify for this classification, the land must have produced irrigated crops at some point during the two update cycles prior to NRCS mapping. The Planning Area contains approximately 8.0 acres of Farmland of Statewide Importance.



- City of Moreno Valley
- Sphere of Influence
- Williamson Act Contract Lands
- FMMP**
- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Grazing Land
- Farmland of Local Importance
- Water
- Urban and Built-Up Land
- Other Land



**FIGURE 4.2-1**  
**FMMP Important Farmlands**

Data Source: ESRI 2021, City of Moreno Valley, 2019; Riverside County GIS, 2019; Dyett & Bhatia, 2019, California Department of Conservation, 2016

### **c. Unique Farmland**

Unique Farmland is of lesser quality soils used for the production of the state's leading agricultural crops. Unique Farmland includes areas that do not meet the above stated criteria for Prime Farmland or Farmland of Statewide Importance, but that have been used for the production of specific high economic value crops during the two update cycles prior to the mapping date. It has the special combination of soil quality, location, growing season, and moisture supply needed to produce sustained high quality and/or high yields of a specific crop when treated and managed according to current farming methods. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been farmed at some time during the four years prior to the mapping date. The Planning Area contains approximately 20.2 acres of Unique Farmland.

### **d. Farmland of Local Importance**

Farmland of Local Importance is important to the local agricultural economy, as determined by the County Board of Supervisors and a local advisory committee. The County defines Farmland of Local Importance as land with the same characteristics as Prime Farmland or Farmland of Statewide Importance, with the exception of irrigation. The Planning Area contains approximately 9,688.6 acres of Farmland of Local Importance.

### **e. Grazing Land**

Grazing Land is land on which the existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit for Grazing Land is 40 acres. The Planning Area contains approximately 1,098.7 acres of Grazing Land.

### **f. Urban and Built-Up Land**

Urban and Built-Up Land consists of land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. The Planning Area contains approximately 19,208.7 acres of land designated as Urban and Built-Up Land.

### **g. Other Land**

Other Land consists of land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines and borrow pits; and water bodies smaller than 40 acres. Vacant and non-agricultural

land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land. The Planning Area contains approximately 12,036.7 acres of land designated as Other Land.

## h. Water

Water consists of perennial water bodies with an extent of at least 40 acres. The Planning Area contains approximately 698.8 acres of land designated as Water.

Table 4.2-1 presents the approximate acreage of each FMMP category within the Planning Area, while Figure 4.2-1 presents the distribution of each FMMP category within the Planning Area.

Category	City	SOI	Total
Prime Farmland	146.1	10.9	157.0
Farmland of Statewide Importance	2.7	5.3	8.0
Unique Farmland	19.3	0.9	20.2
Farmland of Local Importance	8,399.8	1,288.8	9,688.6
Grazing Land	746.9	351.8	1,098.7
Urban and Built-Up Land	19,184.2	24.5	19,208.7
Other Land	4,498.0	7,538.6	12,036.7
Water	0.3	698.5	698.8
<b>TOTAL</b>	<b>32,997.3</b>	<b>9,919.4</b>	<b>42,916.7</b>
SOI = sphere of influence			

### 4.2.2.2 California Land Conservation Act

The California Land Conservation Act of 1965, better known as the Williamson Act (California Administrative Code §51200 et seq.), creates an arrangement whereby private landowners contract with local governments to voluntarily restrict land to agricultural or related open space uses. In return, restricted parcels are assessed for property tax purposes, at a rate consistent with their actual use, rather than potential market value, which saves landowners from 20 percent to 75 percent in property tax liability each year. Local governments receive an annual subvention of forgone property tax revenues from the state via the Open Space Subvention Act of 1971 (California Government Code Section 16140-16154). Initially signed for a minimum 10-year period, the contracts are automatically renewed each year for a successive minimum 10-year period unless a notice of non-renewal is filed, or a contract cancellation is approved by the local government. Review of CDC, Division of Land Resource Protection, Conservation Program Support mapping data determined that there are no parcels protected by Williamson Act Contracts within the city. Four contiguous parcels totaling 144.75 acres located within the southeasternmost portion of the sphere of influence are protected by a Williamson Act Contract.

### 4.2.3 Methodologies for Determining Impacts

The impact evaluation began with a review of the history of agricultural resource production within the Planning Area, and mapping the acreage of each FMMP category within the Planning Area. A review of existing Williamson Act Contracts within the Planning Area was also conducted. The proposed Concept Areas were then overlain on the existing FMMP and Williamson Act Contract data to determine the approximate maximum acreage of impact to existing resources within the Planning Area. This was followed by an evaluation of how proposed GPU goals would serve to either preserve or impact agricultural resources within the Planning Area.

### 4.2.4 Basis for Determining Significance

Thresholds used to evaluate impacts related to air quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact related to agriculture and forestry resources would occur if the project would:

- 1) 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;
- 2) Conflict with existing zoning for agricultural use, or a Williamson Act Contract;
- 3) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]);
- 4) Result in the loss of forest land or conversion of forest land to non-forest use; or
- 5) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

### 4.2.5 Impact Analysis

#### 4.2.5.1 Topic 1: Important Farmland

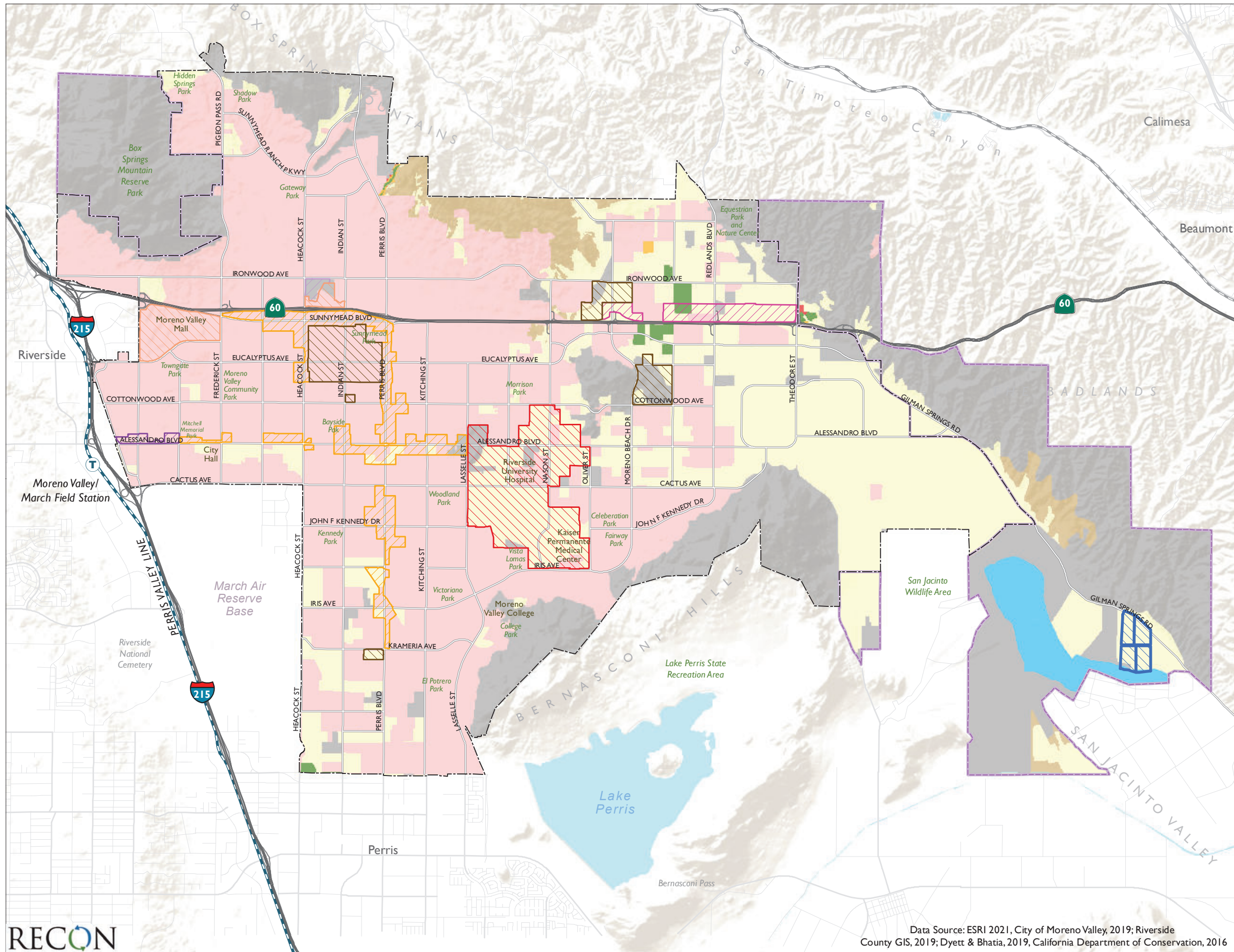
*Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*



Implementation of development consistent with the GPU will result in the conversion of agricultural uses within the Planning Area to urban uses. As shown on Figure 4.2-2, the majority of the Planning Area is mapped as urban and Built-Up land. Pockets of Farmland of Local Importance are located within vacant lots in the urban area in addition to larger swaths of Farmland of Local Importance in the eastern portion of the city. A few areas of Prime Farmland are mapped in the northeast portion of the city near SR-60. Development under the GPU could result in conversion of these mapped Farmlands.

Like the proposed GPU, the 2006 General Plan does not propose any permanent preservation of agricultural land. The 2006 General Plan FEIR anticipated conversion of agricultural land to non-agricultural urban uses, with some agricultural activities continuing as interim uses, as allowed under the City's zoning. While land outside of the Concept Areas may be subject to future development and conversion of Farmlands, this conversion was anticipated by the 2006 General Plan EIR. The land use changes proposed with the GPU are limited to the Concept Areas shown on Figure 4.2-2. The Concept Areas consist of clusters of vacant and underutilized land within the City limit. Table 4.2-2 presents the maximum approximate acreage of impact that would occur through development of the Concept Areas.

<b>Table 4.2-2 Acreage of Maximum Impacts to FMMP Farmland within Concept Areas</b>	
Category	Acres
Prime Farmland	15
Farmland of Statewide Importance	-
Unique Farmland	-
Farmland of Local Importance <sup>1</sup>	1,423
Grazing Land	2
Urban and Built-Up Land	1,528
Other Land	300
Water	0
<b>TOTAL</b>	<b>3,267<sup>2</sup></b>
SOURCE: California Department of Conservation 2021. <sup>1</sup> Since the City has not adopted a local definition for Farmland of Local Importance, mapping reflects the Riverside County definition of Farmland of Local Importance, dating back to before incorporation as a City. <sup>2</sup> Totals may not add due to rounding	



- City of Moreno Valley
- Sphere of Influence
- Williamson Act Contract Lands
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes
- FMMP**
- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Grazing Land
- Farmland of Local Importance
- Water
- Urban and Built-Up Land
- Other Land



**FIGURE 4.2-2**  
**FMMP Important**  
**Farmlands Impacts**

Development within the Downtown Center Concept Area would impact land mapped as Farmland of Local Importance, in addition to a few lots scattered among the Corridor Mixed Use areas. Although these areas were anticipated for development under the 2006 General Plan, a majority of the land remains vacant and available for agricultural use. As a result, implementation of the GPU could result in a significant impact to Farmland in these areas. As detailed in Table 4.2-2, approximately 1,423 acres of Farmland of Local Importance would be impacted within the Concept Areas. Additionally, future development within the Highway/Office Commercial Concept Area north of SR-60 would impact up to approximately 15.0 acres of Prime Farmland, which is farmland with the best combination of physical and chemical features able to sustain long term agricultural production. Although this portion of the Highway/Office Commercial Concept Area currently is not within agricultural production, conversion of these soils designated as Prime Farmland to urban uses would be considered a significant impact. Furthermore, development throughout the city, including areas where no land use changes are proposed, would have the potential to convert land designated as Prime Farmland, Farmland of Local Importance, Farmland of Statewide Importance, and Unique Farmland to non-farming uses.

#### **4.2.5.2 Topic 2: Agricultural Zoning and Williamson Act Contracts**

*Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?*

As the City does not have any exclusive agriculture zones, the project would not conflict with zoning for agricultural use. Although the project does not include any rezoning at this time, future rezoning is anticipated to bring the zones into consistency with the General Plan. Therefore, impacts related to changes to existing zoning would be less than significant. As described in Section 4.2.2.2 above, four contiguous parcels totaling 144.75 acres located within the southeasternmost portion of the sphere of influence is protected by a Williamson Act Contract. The project does not propose any land use changes on or in proximity to the Williamson Act parcels. Therefore, the project would not impact any properties protected by a Williamson Act Contract.

#### **4.2.5.3 Topic 3: Forest Zoning**

*Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?*

The City does not possess any zoning classifications for forestland, timberland, or timberland production zones. No impact would occur.

#### 4.2.5.4 Topic 4: Forest Land

*Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

The Planning Area does not possess any forestland. No impact would occur.

#### 4.2.5.5 Topic 5: Indirect Conversion

*Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

As described in Section 4.2.1 above, the City does not have any lands designated as Agriculture and there is limited active farming remaining in the city, although some intermittent farming activities may still occur north of SR-60 in the northeast portion of the city. Within this area, the proposed Highway/Office Commercial Concept Area north of SR-60 would be located adjacent to Farmlands of Local Importance where interim agricultural uses may still be occurring. Additionally, the GPU would extend the Highway/Office Commercial designation north into existing R1 designated lands, which could further accelerate agricultural conversion beyond the existing 2006 General Plan. Future development with the Highway/Office Commercial Concept Area would generally be compatible with the interim agricultural uses since they do not include a residential component. However, future development could accelerate conversion of agricultural land due to the introduction of a higher intensity land use. As previously discussed, the 2006 General Plan EIR anticipated conversion of all agricultural land uses to urban and rural uses. Furthermore, the Open Space and Resource Conservation Element (OSRC) of the GPU includes the following to support preservation of agricultural resources.

##### ***Goal***

OSRC-1: Preserve, protect, and enhance natural resources, habitats, and watersheds in Moreno Valley and the surrounding area, promoting responsible management practices.

##### ***Policies***

OSRC.1-1 Retain the maximum feasible amount of open space and agricultural land in areas outside the city surrounding Moreno Valley, recognizing its habitat value as well as its contribution to the local economy, quality of life, healthy air quality, and community character.

OSRC.1-6 Where agriculture exists within the City limits, allow uses to continue until urban development occurs on these properties and support appropriate commercial activities (i.e. horse stables, agritourism) in rural areas in and around Moreno Valley.

Nonetheless, implementation of the project would intensify uses within the Planning Area in a manner that would further reduce the feasibility of agricultural production. Furthermore, the continued development of land under the land use designations that would remain unchanged could also indirectly affect the feasibility of agricultural production through urbanization.

## **4.2.6 Cumulative Analysis**

### **4.2.6.1 Topic 1: Important Farmland**

The project would result in the continued decline in important farmland, which is consistent with trends in the broader region. It is anticipated that the amount of important farmland throughout Riverside County would continue to decline over time as population growth and subsequent development would continue to convert important farmland to non-agricultural uses. Therefore, the project would contribute to a cumulatively significant impact on important farmlands.

### **4.2.6.2 Topic 2: Agricultural Zoning and Williamson Act Contracts**

The project would not result in direct impacts related to agricultural zoning or Williamson Act contracts, and therefore would not contribute to a cumulatively significant impact.

### **4.2.6.3 Topic 3: Forest Zoning**

The City does not possess any zoning classifications for forestland, timberland, or timberland production zones, and therefore would not contribute to a cumulative impact.

### **4.2.6.4 Topic 4: Forest Land**

The Planning Area does not possess any forestland, and therefore would not contribute to a cumulative impact.

### **4.2.6.5 Topic 5: Indirect Conversion**

The project would result in the continuation of development pressures that would indirectly reduce the feasibility of agricultural production, which is consistent with trends in the broader region. It is anticipated that indirect conversion of farmland would increase throughout the region due to population growth and subsequent development. This continued growth would result in land use conflicts that could indirectly impact agricultural resources and economic pressures that would be a disincentive to the continuation of agricultural production within the region. Therefore, the project would contribute to cumulatively significant impacts related to the indirect conversion of potential farmland to non-agricultural resources.

## **4.2.7 Significance of Impacts before Mitigation**

### **4.2.7.1 Topic 1: Important Farmland**

Implementation of the GPU would impact Prime Farmland and Farmland of Local Importance within proposed Concept Areas. Furthermore, the continued development of properties under the land use designations that would remain unchanged would also have the potential to convert additional land designated as Prime Farmland, Farmland of Statewide Importance or Unique Farmland to non-farming uses. Although the conversion of Farmland was anticipated and evaluated under the 2006 General Plan EIR, some vacant FMMP designations remain that could be converted to non-agricultural uses, which would be considered significant.

### **4.2.7.2 Topic 2: Agricultural Zoning and Williamson Act Contracts**

No conflicts with agricultural zoning would occur as the City does not have any exclusive agriculture zones and the project does not include any rezoning. Additionally, the GPU does not propose any land use changes within or adjacent to a Williamson Act Contract. Therefore, impacts related to agricultural zoning and Williamson Act Contracts would be less than significant.

### **4.2.7.3 Topic 3: Forest Zoning**

No Impact would occur. No mitigation would be required.

### **4.2.7.4 Topic 4: Forest Land**

No Impact would occur. No mitigation would be required.

### **4.2.7.5 Topic 5: Indirect Conversion**

Implementation of the project would intensify uses within the Planning Area in a manner that would reduce the feasibility of agricultural production. Furthermore, the continued development of land under the land use designations that would remain unchanged could also indirectly affect the feasibility of agricultural production through continued urbanization. Therefore, the project would potentially result in indirect conversion of potential farmland resources to non-agricultural uses, which would be considered a significant impact.

## **4.2.8 Mitigation**

### **4.2.8.1 Topic 1: Important Farmland**

Feasible mitigation that would meet the objectives of the project does not exist to mitigate direct and cumulative impacts to important farmland to a level less than significant. While enrollment in Williamson Act Contracts would serve to preserve such resources, these contracts are voluntary, and the City could only encourage property owners to participate in the program. Furthermore, property owners would have the option not to renew contracts, which would mean that any protection under the program may only be temporary. The project, like the 2006 General Plan, does not propose any permanent preservation of agricultural land, but allows agriculture as an interim use prior to development. Thus, preservation of agricultural resources would not be feasible as it would be inconsistent with General Plan goals and EIR project objectives.

### **4.2.8.2 Topic 2: Agricultural Zoning and Williamson Act Contracts**

Impacts would be less than significant. No mitigation is required.

### **4.2.8.3 Topic 3: Forest Zoning**

No Impact would occur. No mitigation is required.

### **4.2.8.4 Topic 4: Forest Land**

No Impact would occur. No mitigation is required.

### **4.2.8.5 Topic 5: Indirect Conversion**

Feasible mitigation that would meet the objectives of the project does not exist to mitigate direct and cumulative impacts related to indirect conversion of potential farmland non-agricultural uses to a level less than significant. While enrollment in Williamson Act Contracts would serve to preserve such resources, these contracts are voluntary, and the City could only encourage property owners to participate in the program. Furthermore, property owners would have the option not to renew contracts, which would mean that any protection under the program may only be temporary. The project, like the 2006 General Plan, does not propose any permanent preservation of agricultural land, but allows agriculture as an interim use prior to development. Thus, preservation of agricultural resources in order to avoid agriculture interface conflicts and conversion pressure would not be feasible as it would be inconsistent with General Plan goals and EIR project objectives.

## **4.2.9 Significance of Impacts after Mitigation**

### **4.2.9.1 Topic 1: Important Farmland**

No feasible mitigation is available. Impacts would remain significant and unavoidable.

### **4.2.9.2 Topic 2: Agricultural Zoning and Williamson Act Contracts**

Impacts would be less than significant. No mitigation is required.

### **4.2.9.3 Topic 3: Forest Zoning**

No Impact would occur. No mitigation is required.

### **4.2.9.4 Topic 4: Forest Land**

No Impact would occur. No mitigation is required.

### **4.2.9.5 Topic 5: Indirect Conversion**

No feasible mitigation is available. Impacts would remain significant and unavoidable.



## 4.3 Air Quality

This section analyzes the air quality impacts that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area. The analysis in this section is based on the methodology recommended by the South Coast Air Quality Management District (SCAQMD) and is based on the existing and future land uses under both the 2021 GPU and the existing 2006 General Plan, as modeled using the California Emissions Estimator Model (CalEEMod), the California Air Resources Board (CARB) Emissions Factor model (EMFAC2021), the energy use projections included in the CAP, and vehicle miles traveled (VMT) documented in the Moreno Valley General Plan Circulation Element Vehicle Miles Traveled Impact Assessment Memorandum (Fehr & Peers 2021).

### 4.3.1 Existing Conditions

#### 4.3.1.1 South Coast Air Basin

The Planning Area is located within the South Coast Air Basin (Basin), which is under the jurisdiction of the SCAQMD. The 6,745-square-mile Basin encompasses Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and is bound by the Pacific Ocean to the west, the San Gabriel, San Bernardino, and Jacinto mountains to the north and east, respectively, and San Diego County to the south. The Basin is designated as in attainment or unclassifiable attainment (expected to be meeting the standard despite a lack of monitoring data) for all federal air quality standards except 8-hour ozone and 2.5-micron particulate matter (PM<sub>2.5</sub>) standards. The Basin is designated as in nonattainment for state air quality standards for 8-hour ozone and PM<sub>2.5</sub>, and additionally is in nonattainment of state 10-micron particulate matter (PM<sub>10</sub>) standards.

Air quality is commonly expressed as the number of days in which air pollution levels exceed state standards set by CARB or federal standards set by the U.S. Environmental Protection Agency (USEPA). The SCAQMD maintains 41 active air quality monitoring sites located throughout the Basin including eight active sites in Riverside County. Air pollutant concentrations and meteorological information are continuously recorded at these stations. Measurements are then used by scientists to help forecast daily air pollution levels.

The nearest monitoring stations include the Perris monitoring station, located approximately five miles south of the planning area at 237½ North D Street, and the Riverside – Rubidoux monitoring station, located approximately seven miles northwest of the city at 5888 Mission Boulevard. The Perris monitoring station measures ozone and PM<sub>10</sub>, and the Rubidoux monitoring station measures ozone, nitrogen dioxide (NO<sub>2</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>. Table 4.3-1 provides a summary of measurements collected at the Perris and Rubidoux monitoring stations for the years 2015 through 2019.

**Table 4.3-1  
Summary of Air Quality Measurements Recorded at  
Perris and Riverside – Rubidoux Monitoring Stations**

Pollutant/Standard	2015	2016	2017	2018	2019
<b>Perris Monitoring Station</b>					
Ozone					
Federal Max 8-hr (ppm)	0.102	0.098	0.105	0.103	0.095
Days 2015 Federal 8-hour Standard Exceeded (0.07 ppm)	49	55	80	67	64
Days 2008 Federal 8-hour Standard Exceeded (0.075 ppm)	31	30	52	47	38
State Max 8-hr (ppm)	0.103	0.099	0.106	0.103	0.096
Days State 8-hour Standard Exceeded (0.07 ppm)	50	56	86	68	66
Max. 1-hr (ppm)	0.124	0.131	0.120	0.117	0.118
Days State 1-hour Standard Exceeded (0.09 ppm)	25	23	33	31	28
PM <sub>10</sub> *					
Federal Max. Daily (µg/m <sup>3</sup> )	188.0	76.0	75.4	64.4	97.0
Measured Days Federal 24-hour Standard Exceeded (150 µg/m <sup>3</sup> )	1	0	0	0	0
Calculated Days Federal 24-hour Standard Exceeded (150 µg/m <sup>3</sup> )	6.6	0.0	0.0	0.0	0.0
Federal Annual Average (µg/m <sup>3</sup> )	33.1	32.2	32.6	30.2	25.8
State Max. Daily (µg/m <sup>3</sup> )	178.0	76.0	75.4	64.4	92.1
Measured Days State 24-hour Standard Exceeded (50 µg/m <sup>3</sup> )	4	5	11	2	4
Calculated Days State 24-hour Standard Exceeded (50 µg/m <sup>3</sup> )	25.7	--	68.7	12.1	24.5
State Annual Average (µg/m <sup>3</sup> )	31.4	--	32.6	28.9	24.4
<b>Riverside – Rubidoux Monitoring Station</b>					
Ozone					
Federal Max 8-hr (ppm)	0.105	0.104	0.118	0.101	0.096
Days 2015 Federal 8-hour Standard Exceeded (0.07 ppm)	55	69	81	53	59
Days 2008 Federal 8-hour Standard Exceeded (0.075 ppm)	39	47	58	34	37
State Max 8-hr (ppm)	0.106	0.105	0.119	0.101	0.096
Days State 8-hour Standard Exceeded (0.07 ppm)	59	71	82	57	63
Max. 1-hr (ppm)	0.132	0.142	0.145	0.123	0.123
Days State 1-hour Standard Exceeded (0.09 ppm)	31	33	47	22	24
NO <sub>2</sub>					
Max 1-hr (ppm)	0.0574	0.0731	0.0630	0.0554	0.0560
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0	0	0
Days Federal 1-hour Standard Exceeded (0.100 ppm)	0	0	0	0	0
Annual Average (ppm)	0.014	0.014	0.014	0.014	0.014
PM <sub>10</sub> *					
Federal Max. Daily (µg/m <sup>3</sup> )	69.0	84.0	92.0	86.5	132.5
Measured Days Federal 24-hour Standard Exceeded (150 µg/m <sup>3</sup> )	0	0	0	0	0
Calculated Days Federal 24-hour Standard Exceeded (150 µg/m <sup>3</sup> )	0.0	0.0	0.0	0.0	0.0
Federal Annual Average (µg/m <sup>3</sup> )	32.2	38.1	39.0	35.4	35.4
State Max. Daily (µg/m <sup>3</sup> )	107.4	170.5	137.6	126.0	182.4
Measured Days State 24-hour Standard Exceeded (50 µg/m <sup>3</sup> )	87	60	98	127	110
Calculated Days State 24-hour Standard Exceeded (50 µg/m <sup>3</sup> )	92.2	--	102.5	133.6	116.4
State Annual Average (µg/m <sup>3</sup> )	40.0	--	41.3	43.9	40.9
PM <sub>2.5</sub> *					
Federal Max. Daily (µg/m <sup>3</sup> )	54.7	51.5	50.3	66.3	55.7
Measured Days Federal 24-hour Standard Exceeded (35 µg/m <sup>3</sup> )	9	5	7	3	5
Calculated Days Federal 24-hour Standard Exceeded (35 µg/m <sup>3</sup> )	10.3	5.1	7.2	3.1	5.2
Federal Annual Average (µg/m <sup>3</sup> )	11.8	12.5	12.2	12.5	11.2
State Max. Daily (µg/m <sup>3</sup> )	61.1	60.8	50.3	68.3	57.6
State Annual Average (µg/m <sup>3</sup> )	15.3	12.6	14.5	12.6	11.2

SOURCE: CARB 2021.

ppm = parts per million; µg/m<sup>3</sup> = micrograms per cubic meter; Na = Not available.

\* Calculated days value. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.

As shown in Table 4.3-1, there are exceedances of ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> standards. These exceedances occur throughout the Basin. Due to these exceedances, the Basin is designated as nonattainment for federal 8-hour ozone and PM<sub>2.5</sub> standards, and nonattainment for state 8-hour ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> standards. The 2016 Air Quality Management Plan (discussed later under Local Air Quality Regulations) addresses how the Basin plans to improve air quality and meet the attainment standards.

### **4.3.1.2 Regional Climate and Meteorology**

The Planning Area is located approximately 40 miles northeast of the Pacific Ocean, within Riverside County between the Santa Ana Mountains and the San Jacinto Mountains. Air quality in the county is influenced by both topographical and meteorological conditions.

The Planning Area, like other inland valley areas in southern California, has a Mediterranean climate characterized by warm, dry summers and mild, wet winters. The March Field climate monitoring station (ID 045326) is located immediately southwest of the Planning Area and the Perris climate monitoring station (ID 046816) is located approximately five miles south of the Planning Area. Based on measurements taken at these climate monitoring stations, the average annual precipitation is 8 to 10 inches, falling primarily from November to April (Western Regional Climate Center 2020). Overall annual temperatures in the project area average about 62 degrees Fahrenheit (°F), winter low temperatures average about 36°F, and summer high temperatures average about 93°F.

The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds. These winds tend to blow pollutants away from the coast toward the inland areas. Consequently, air quality near the coast is generally better than that which occurs at the base of the coastal mountain range.

The prevailing westerly wind pattern is sometimes interrupted by regional “Santa Ana” conditions. A Santa Ana occurs when a strong high pressure develops over the Nevada–Utah area and overcomes the prevailing westerly coastal winds, sending strong, steady, hot, dry northeasterly winds over the mountains and out to sea.

## **4.3.2 Applicable Regulatory Requirements**

### **4.3.2.1 Federal Air Quality Regulations**

Ambient Air Quality Standards (AAQS) represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. The federal Clean Air Act (CAA) was enacted in 1970 and amended in 1977 and 1990 [42 United States Code (USC) 7401] for the purposes of protecting and enhancing the quality of the nation’s air resources to benefit public health, welfare, and productivity. In 1971, in order to achieve the purposes of Section 109 of the CAA [42 USC 7409], the USEPA developed primary and secondary National Ambient Air Quality Standards (NAAQS).

Six criteria pollutants of primary concern have been designated: ozone, carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), NO<sub>2</sub>, lead (Pb), and PM<sub>10</sub> and PM<sub>2.5</sub>. The primary NAAQS “. . . in

the judgment of the Administrator, based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health . . . ” and the secondary standards “. . . protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air” [42 USC 7409(b)(2)]. The primary NAAQS were established, with a margin of safety, considering long-term exposure for the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties). The NAAQS are presented in Table 4.3-2 (CARB 2016).

### **4.3.2.2 State Air Quality Regulations**

#### **a. California Ambient Air Quality Standards**

The USEPA allows states the option to develop different (stricter) standards. The state of California has developed the California Ambient Air Quality Standards (CAAQS) and generally has set more stringent limits on the criteria pollutants (see Table 4.3-2). In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride (see Table 4.3-2). Similar to the federal CAA, the state classifies specific geographic areas as either “attainment” or “nonattainment” areas for each pollutant based on the comparison of measured data with the CAAQS.

The state of California is divided geographically into 15 air basins for managing the air resources of the state on a regional basis. Areas within each air basin are considered to share the same air masses, and therefore are expected to have similar ambient air quality. If an air basin is not in either federal or state attainment for a particular pollutant, the basin is classified as a moderate, serious, severe, or extreme nonattainment area for that pollutant (there is also a marginal classification for federal nonattainment areas). Once a nonattainment area has achieved the air quality standards for a particular pollutant, it may be redesignated to an attainment area for that pollutant. To be redesignated, the area must meet air quality standards and have a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the federal CAA. Areas that have been redesignated to attainment are called maintenance areas.

#### **b. Toxic Air Contaminants**

A toxic air contaminant (TAC) is any air pollutant that may cause or contribute to an increase in mortality or serious illness, or that may pose a present or potential hazard to human health. The public’s exposure to TACs is a significant public health issue in California. Diesel-exhaust particulate matter emissions have been established as TACs. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (Assembly Bill [AB] 1807: Health and Safety Code Sections 39650–39674). The California Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

Table 4.3-2 Ambient Air Quality Standards						
Pollutant	Averaging Time	California Standards <sup>1</sup>		National Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Ozone <sup>8</sup>	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.07 ppm (137 µg/m <sup>3</sup> )		0.070 ppm (137 µg/m <sup>3</sup> )		
Respirable Particulate Matter (PM <sub>10</sub> ) <sup>9</sup>	24 Hour	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		–		
Fine Particulate Matter (PM <sub>2.5</sub> ) <sup>9</sup>	24 Hour	No Separate State Standard		35 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	12 µg/m <sup>3</sup>	15 µg/m <sup>3</sup>	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	Non-dispersive Infrared Photometry	35 ppm (40 mg/m <sup>3</sup> )	–	Non-dispersive Infrared Photometry
	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )	–	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )		–	–	
Nitrogen Dioxide (NO <sub>2</sub> ) <sup>10</sup>	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	Gas Phase Chemi- luminescence	100 ppb (188 µg/m <sup>3</sup> )	–	Gas Phase Chemi- luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )		0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary Standard	
Sulfur Dioxide (SO <sub>2</sub> ) <sup>11</sup>	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	75 ppb (196 µg/m <sup>3</sup> )	–	Ultraviolet Fluorescence; Spectro- photometry (Pararosaniline Method)
	3 Hour	–		–	0.5 ppm (1,300 µg/m <sup>3</sup> )	
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>11</sup>	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas) <sup>11</sup>	–	
Lead <sup>12,13</sup>	30 Day Average	1.5 µg/m <sup>3</sup>	Atomic Absorption	–	–	High Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m <sup>3</sup> (for certain areas) <sup>12</sup>	Same as Primary Standard	
	Rolling 3-Month Average	–		0.15 µg/m <sup>3</sup>		
Visibility Reducing Particles <sup>14</sup>	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m <sup>3</sup>	Ion Chroma- tography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence			
Vinyl Chloride <sup>12</sup>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chroma- tography			

See footnotes on next page.

**Table 4.3-2  
Ambient Air Quality Standards**

SOURCE: CARB 2016.

ppm = parts per million; ppb = parts per billion;  $\mu\text{g}/\text{m}^3$  = micrograms per cubic meter; – = not applicable.

- <sup>1</sup> California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- <sup>2</sup> National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM<sub>10</sub>, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150  $\mu\text{g}/\text{m}^3$  is equal to or less than one. For PM<sub>2.5</sub>, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the USEPA for further clarification and current national policies.
- <sup>3</sup> Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- <sup>4</sup> Any equivalent measurement method which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.
- <sup>5</sup> National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- <sup>6</sup> National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- <sup>7</sup> Reference method as described by the USEPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the USEPA.
- <sup>8</sup> On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- <sup>9</sup> On December 14, 2012, the national annual PM<sub>2.5</sub> primary standard was lowered from 15  $\mu\text{g}/\text{m}^3$  to 12.0  $\mu\text{g}/\text{m}^3$ . The existing national 24-hour PM<sub>2.5</sub> standards (primary and secondary) were retained at 35  $\mu\text{g}/\text{m}^3$ , as was the annual secondary standards of 15  $\mu\text{g}/\text{m}^3$ . The existing 24-hour PM<sub>10</sub> standards (primary and secondary) of 150  $\mu\text{g}/\text{m}^3$  also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- <sup>10</sup> To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of ppb. California standards are in units of ppm. To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- <sup>11</sup> On June 2, 2010, a new 1-hour SO<sub>2</sub> standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO<sub>2</sub> national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour national standard is in units of ppb. California standards are in units of ppm. To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
- <sup>12</sup> The Air Resources Board has identified lead and vinyl chloride as ‘toxic air contaminants’ with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- <sup>13</sup> The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5  $\mu\text{g}/\text{m}^3$  as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- <sup>14</sup> In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are “extinction of 0.23 per kilometer” and “extinction of 0.07 per kilometer” for the statewide and Lake Tahoe Air Basin standards, respectively.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. Additionally, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly Bill) was enacted in 1987 and requires stationary sources to report

the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels. The Children's Environmental Health Protection Act, California Senate Bill 25 (Chapter 731, Escutia, Statutes of 1999), focuses on children's exposure to air pollutants. The act requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air quality monitoring network, and develop any additional air toxic control measures needed to protect children's health.

In April 2005, CARB published the *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB 2005). The handbook makes recommendations directed at protecting sensitive land uses from air pollutant emissions while balancing a myriad of other land use issues (e.g., housing, transportation needs, economics, etc.). It notes that the handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. As reflected in the CARB handbook, there is currently no adopted standard for the significance of health effects from mobile sources. Therefore, the CARB has provided guidelines for the siting of land uses near heavily traveled roadways. Of pertinence to this impact analysis, the CARB guidelines indicate that siting new sensitive land uses within 500 feet of a freeway or an urban road with 100,000 or more vehicles per day should be avoided when possible. Based on vehicle counts conducted by the California Department of Transportation (Caltrans) in 2017, in the vicinity of the city, Interstate 215 (I-215) and State Route 60 (SR-60) currently carry more than 100,000 vehicles per day (Caltrans 2017a).

As an ongoing process, CARB continues to establish new programs and regulations for the control of diesel-particulate and other air-toxics emissions as appropriate. The continued development and implementation of these programs and policies will ensure that the public's exposure to diesel particulate matter will continue to decline.

### **c. State Implementation Plan**

The State Implementation Plan (SIP) is a collection of documents that set forth the state's strategies for achieving the NAAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls. The CARB is the lead agency for all purposes related to the SIP under state law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. The CARB then forwards SIP revisions to the USEPA for approval and publication in the *Federal Register*. All of the items included in the California SIP are listed in the Code of Federal Regulations (CFR) at 40 CFR 52.220.

As the regional air quality management district, the SCAQMD is responsible for preparing and implementing the portion of the SIP applicable to the Basin. The air pollution control district for each county adopts rules, regulations, and programs to attain federal and state

air quality standards, and appropriates money (including permit fees) to achieve these objectives.

### 4.3.2.3 Regional Air Quality Regulations

#### a. South Coast Air Quality Management District

The SCAQMD is the air pollution control agency in the Basin. The role of the local SCAQMD is to protect the people and the environment of the Basin from the effects of air pollution. SCAQMD shares responsibility with CARB for ensuring that NAAQS and CAAQS are achieved and maintained within the Basin. As the SCAQMD is designated as a nonattainment area for state air quality standards for 8-hour ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>, SCAQMD periodically prepares air quality management plans (AQMPs) outlining measures to reduce these pollutants. The most recent AQMP is the *2016 Air Quality Management Plan* (2016 AQMP).

#### b. SCAQMD Amicus Brief

A recent Supreme Court of California decision, *Sierra Club v. County of Fresno* (2019) 6 Cal. 5th 502 (“Friant Ranch”; California Supreme Court 2019), found that the EIR prepared for the Friant Ranch Specific Plan was inadequate because it did not relate the expected adverse air quality impacts to likely health consequences, or explain why it was not feasible to provide such an analysis. In response, the SCAQMD has provided amicus briefs explaining the difficulties in providing correlation between regional pollutant emissions and human health. Since the project would result in emissions of criteria pollutants, the California Supreme Court decision and the SCAQMD’s amicus briefs are relevant to the project.

The California Supreme Court conceded that an explanation of the connection between an individual project’s pollutant emissions in excess of thresholds and human health effects may not be possible given the current state of environmental science modeling. However, the California Supreme Court concluded that the Friant Ranch Project EIR itself must explain, in a manner reasonably calculated to inform the public, the scope of what is, and is not yet known, about the effect of the project’s significant and unavoidable air quality impacts on human health. The specific language provided by the Court is provided below.

The EIR fails to provide an adequate discussion of health and safety problems that will be caused by the rise in various pollutants resulting from the Project’s development. At this point, we cannot know whether the required additional analysis will disclose that the Project’s effects on air quality are less than significant or unavoidable, or whether that analysis will require reassessment of proposed mitigation measures. Absent an analysis that reasonably informs the public how anticipated air quality effects will adversely affect human health, an EIR may still be sufficient if it adequately explains why it is not scientifically feasible at the time of drafting to provide such an analysis.



With regard to the analysis of air quality-related health impacts, the SCAQMD has stated that “EIRs must generally quantify a project’s pollutant emissions, but in some cases it is not feasible to correlate these emissions to specific, quantifiable health impacts (e.g., premature mortality; hospital admissions).” In such cases, a general description of the adverse health impacts resulting from the pollutants at issue may be sufficient.

The SCAQMD has further stated that from a scientific standpoint, it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region. SCAQMD further acknowledges that it may be feasible to analyze air quality related health impacts for projects on a regional scale with very high emissions of oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOCs), where impacts are regional. The example SCAQMD provided was for proposed Rule 1315, which authorized various newly permitted sources to use offsets from the SCAQMD’s “internal bank” of emission reductions. The California Environmental Quality Act (CEQA) analysis accounted for essentially all of the increases in emissions due to new or modified sources in the District between 2010 and 2030, or approximately 6,620 pounds per day of NO<sub>x</sub> and 89,947 pounds per day of VOC, to expected health outcomes from ozone and particulate matter (e.g., 20 premature deaths per year and 89,947 school absences in the year 2030 due to ozone).

### **c. Multiple Air Toxics Exposure Study**

The Multiple Air Toxics Exposure Study (MATES) is a monitoring and evaluation study conducted in the Basin. The MATES IV study, which is an update of previous studies, includes a fixed site monitoring program with 10 stations, an inventory of TACs, and a modeling effort to characterize risk across the Basin. The purpose of the MATES IV fixed site monitoring is to characterize long-term regional air toxics levels in residential and commercial areas. MATES IV predicts that the excess cancer risk for the Planning Area ranges from 500 to 800 in a million (SCAQMD 2015). The MATES IV study represents the baseline health risk for a cumulative analysis. The MATES V update is currently being conducted (SCAQMD 2017).

## **4.3.3 Methodologies for Determining Impacts**

### **4.3.3.1 Construction Emissions**

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include the following:

- Fugitive dust from grading activities;
- Construction equipment exhaust;
- Construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- Construction-related power consumption.

Air pollutants generated by future development within the Planning Area would vary depending upon the number of projects occurring simultaneously and the size of each

individual project. The exact number and timing of all development projects that could occur under project buildout are unknown. As such, construction-related emissions cannot be accurately determined at the program level of analysis. However, typical construction emissions associated with a typical project that could be developed were calculated to illustrate the potential construction-related air quality impacts that could occur. The project would primarily focus development and redevelopment within Concept Areas that would create mixed-use activity centers. The hypothetical project analyzed is a five-acre mixed-use development consisting of the demolition of a 20,000-square-foot structure and the construction of 300 multi-family residential units and 10,000 square feet of retail uses.

Construction emissions were calculated using CalEEMod 2016.3.2 (CAPCOA 2017). The CalEEMod program is a tool used to estimate air emissions resulting from land development projects based on California-specific emission factors. The model estimates mass emissions from two basic sources: construction sources and operational sources (i.e., area and mobile sources). CalEEMod can estimate the required construction equipment when project-specific information is unavailable. The estimates are based on surveys performed by the SCAQMD and the Sacramento Metropolitan Air Quality Management District (SMAQMD) of typical construction projects, which provide a basis for scaling equipment needs and schedule with a project's size. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters.

As the project does not specifically identify any specific development project, CalEEMod default estimates were used to develop the construction scenarios. Where applicable, inputs were modified to reflect local ordinances and regulations. Construction operations are subject to the requirements established by the SCAQMD including Rule 403, Fugitive Dust. Rule 403 requires the use of best available control measures for fugitive dust. CalEEMod modeling output files for construction activities are included in Appendix B.

### 4.3.3.2 Operational Emissions

Operation emissions are long-term and include mobile, energy, and area sources. Sources of operational emissions associated with future development under the project include the following:

- Vehicle traffic;
- Natural gas consumption; and
- Area sources including architectural coatings, consumer products, fireplaces, and landscaping equipment.

Air pollutants generated by all land uses within the Planning Area were calculated for the existing condition based on the 2018 baseline and for buildout of the 2021 GPU and existing 2006 General Plan in year 2040. The 2018 baseline is based on year 2018 population and employment, VMT, existing land uses, and building energy data provided by local utilities in preparation of the CAP. The Southern California Association of Governments (SCAG) model consistent with the 2016 SCAG Regional Transportation Plan/Sustainable Communities

Strategy (RTP/SCS) growth projections was used to project future emissions under buildout of the 2021 GPU and existing 2006 General Plan in year 2040, both of which include pipeline projects described in Section 3.2.4.1.b. Actual emissions would vary depending on future projects and regulations within the GPU.

Vehicle traffic is the main source of emissions in the Planning Area. Regional mobile-source emissions were estimated based on CARB's Emission Factor model (EMFAC2021; CARB 2021) and the VMT for the Planning Area (Fehr & Peers 2021). The Planning Area generates 3,144,986 VMT in the existing condition, and buildout of the existing 2006 General Plan would generate 4,566,084 VMT. In comparison, buildout of the project would generate 4,524,038 VMT, which would be less than buildout of the existing 2006 General Plan. The project would achieve this reduction in VMT by primarily focusing future development and redevelopment within the proposed Concept Areas, which would reduce reliance on vehicular travel compared to the existing 2006 General Plan. Therefore, the project would generate less VMT compared to buildout of the existing 2006 General Plan.

An area source associated with development includes natural gas used in space and water heating. Existing and future residential and non-residential natural gas use was calculated as a part of the GHG inventory and projections prepared in conjunction with the CAP. Existing energy consumption data for residential, commercial, and industrial sectors were obtained from the Southern California Gas Company. Residential, commercial, and industrial natural gas consumption was projected to year 2040 based on the existing 2006 General Plan and proposed 2021 GPU land uses and population projections, and applied energy savings associated with implementation of Title 24 standards in newly constructed buildings. Criteria pollutant emissions resulting from natural gas combustion were then calculated using USEPA AP-42 emission factors.

Other area sources of emissions associated with development include architectural coatings, consumer products, and landscape equipment. Emissions due to these area sources were calculated using CalEEMod 2016.3.2. All CalEEMod defaults associated with these area sources were used.

### **4.3.4 Basis for Determining Significance**

Thresholds used to evaluate impacts to air quality are based on applicable criteria in the CEQA Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact would occur if the project would:

- 1) Conflict with or obstruct implementation of the applicable air quality plan;
- 2) 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 standards;
- 3) Expose sensitive receptors to substantial pollutant concentrations; or
- 4) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

### 4.3.4.1 SCAQMD Significance Thresholds

As discussed previously, the SCAQMD is the air pollution control agency responsible for protecting the people and the environment of the Basin from the effects of air pollution. Accordingly, the City evaluates project air quality emissions based on the quantitative emission thresholds originally established in the SCAQMD's CEQA Air Quality Handbook (SCAQMD 1993, 2019).

#### a. Regional Significance Thresholds

SCAQMD has adopted regional construction and operational emissions thresholds to determine a project's cumulative impact on air quality in the Basin. SCAQMD's significance thresholds for impacts to regional air quality are shown in Table 4.3-3.

Pollutant	Emissions (pounds)	
	Construction	Operational
Oxides of Nitrogen (NO <sub>x</sub> )	100	55
Volatile Organic Compounds (VOC)	75	55
Coarse Particulate Matter (PM <sub>10</sub> )	150	150
Fine Particulate Matter (PM <sub>2.5</sub> )	55	55
Oxides of Sulfur (SO <sub>x</sub> )	150	150
Carbon Monoxide (CO)	550	550
Lead (Pb)*	3	3

SOURCE: SCAQMD Air Quality Significance Thresholds (SCAQMD 2019).

Projects that exceed the regional significance threshold contribute to the nonattainment designations of the Basin. The attainment designations are based on the AAQS, which are set at levels of exposure that are determined to not result in adverse health effects. Projects that do not exceed the regional significance thresholds in Table 4.3-3 would not violate any air quality standards or contribute substantially to an existing or projected air quality violation.

#### b. Localized Significance Thresholds

The SCAQMD's Final Localized Significance Threshold (LST) Methodology was developed as a tool to assist lead agencies to analyze localized air quality impacts to sensitive receptors in the vicinity of the project (SCAQMD 2008). Emissions of NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> generated at a project site could expose sensitive receptors to substantial concentrations of criteria air pollutants. Off-site mobile-source emissions are not included in the LST analysis. A project would generate a significant impact if it generates emissions that would violate the NAAQS or CAAQS (see Table 4.3-2) when added to the local background concentrations.

## 4.3.5 Impact Analysis

### 4.3.5.1 Topic 1: Air Quality Plans

*Would the project conflict with or obstruct implementation of the applicable air quality plan?*

The California CAA requires air basins that are designated nonattainment of state AAQS for criteria pollutants prepare and implement plans to attain the standards by the earliest practicable date. The Basin is designated as in attainment or unclassifiable attainment (expected to be meeting the standard despite a lack of monitoring data) for all federal air quality standards except for the 8-hour ozone and PM<sub>2.5</sub> standards. The Basin is also designated as in nonattainment for state air quality standards for 8-hour ozone and PM<sub>2.5</sub>, and additionally is in nonattainment of state PM<sub>10</sub> standards. The regional air quality plan, the 2016 AQMP, outlines measures to reduce emissions of ozone and PM<sub>2.5</sub>. Reducing PM concentrations is achieved by reducing emissions of PM<sub>2.5</sub> to the atmosphere, reducing ozone concentrations is achieved by reducing the precursors of photochemical formation of ozone, VOC, and NO<sub>x</sub>.

The growth forecasting for the AQMP is based in part on the land uses established by local general plans. These emissions budgets are used in statewide air quality attainment planning efforts. As such, projects that propose development at an intensity equal to or less than population growth projections and land use intensity are inherently consistent with the AQMP. Amending the adopted land uses to change development potential would not necessarily result in an inconsistency between the current air quality plans (that are based on the existing 2006 General Plan) and the proposed 2021 GPU. Projects that propose a different land use than is identified in the local general plan may also be considered consistent with the AQMP if the proposed land use is less intensive than buildout under the current designation. For projects that propose a land use that is more intensive than the current designation, analysis that is more detailed is required to assess conformance with the AQMP. Consistency with the AQMP is further evaluated by comparing emissions that would occur under buildout of the existing 2006 General Plan to the emissions that would occur under buildout of the proposed 2021 GPU.

The two principal criteria for conformance with an AQMP are:

1. Whether the project would exceed the assumptions in the AQMP.
2. Whether the project would result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards.

When compared to the existing 2006 General Plan, the project would increase the number multi-family residential units and decrease the number of single-family units, while maintaining the same total number of residential units within the Planning Area. The project would also decrease the amount of commercial and industrial space compared to the existing 2006 General Plan. Overall, buildout of the project would result in a decrease in service

population within the Planning Area compared to buildout of the existing 2006 General Plan. The county-wide population would be the same under buildout of both the project and existing 2006 General Plan. Additionally, buildout of the existing 2006 General Plan would generate 4,566,084 VMT, while buildout of the project would generate 4,524,038 VMT, a decrease of 42,046 miles. The project would focus development primarily into Concept Areas, creating mixed-use activity centers that are pedestrian-friendly, centers of community, and linked to the regional transit system. Implementation of this land use pattern decreases VMT and reduces mobile emissions.

Operational emissions were calculated using the methodology discussed in Section 4.3.3. Existing and future emissions are summarized in Table 4.3-4. Calculations are provided in Appendix B.

<b>Table 4.3-4</b>						
<b>Total Operational Emissions for the Planning Area</b>						
Source	Pollutant (pounds per day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
EXISTING BASELINE (2018)						
Area	2,521	53	4,599	<1	25	25
Energy	82	739	559	4	57	57
Mobile	289	3,161	9,856	29	223	107
<b>TOTAL</b>	<b>2,892</b>	<b>3,953</b>	<b>15,014</b>	<b>34</b>	<b>305</b>	<b>189</b>
EXISTING 2006 GENERAL PLAN (2040)						
Area	4,969	73	6,365	<1	35	35
Energy	121	1,082	796	7	84	84
Mobile	67	887	5,096	31	254	91
<b>TOTAL</b>	<b>5,157</b>	<b>2,032</b>	<b>12,257</b>	<b>38</b>	<b>373</b>	<b>210</b>
PROPOSED 2021 GPU (2040)						
Area	4,276	73	6,363	<1	35	35
Energy	117	1,050	784	6	81	81
Mobile	67	869	5,049	31	252	90
<b>TOTAL</b>	<b>4,460</b>	<b>1,993</b>	<b>12,196</b>	<b>38</b>	<b>368</b>	<b>207</b>
<i>Change (Proposed GPU – Adopted General Plan)</i>	<i>-697</i>	<i>-39</i>	<i>-61</i>	<i>0</i>	<i>-5</i>	<i>-3</i>

As shown in Table 4.3-4, buildout of the 2021 GPU would result in a decrease in emissions when compared to buildout of the existing 2006 General Plan. Therefore, buildout of the project would not exceed the assumptions used to develop the AQMP, and the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. Therefore, the project would not conflict with implementation of the AQMP, and impacts would be less than significant.

#### 4.3.5.2 Topic 2: Criteria Pollutants

*Would the 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 standards?*

Air quality impacts can result from the construction and operation of a project. Construction impacts are short-term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries. Operational impacts can occur on two levels: regional impacts resulting from development or local effects stemming from sensitive receivers being placed close to roadways or stationary sources. In the case of the project, operational impacts would primarily be due to emissions from mobile sources associated with vehicular travel along the roadways.

### a. Construction

As discussed in Section 4.3.3.1 above, a five-acre mixed-use development project consisting of the demolition of a 20,000-square-foot structure and the construction of 300 multi-family residential units and 10,000 square feet of retail uses was modeled to illustrate potential construction-related air quality impacts associated with future development under the project. The results are summarized in Table 4.3-5. CalEEMod output is contained in Appendix B.

Construction Phase	Pollutant (pounds per day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Demolition	3	27	21	<1	2	1
Site Preparation	3	33	20	<1	20	11
Grading	2	21	16	<1	8	4
Building Construction/ Architectural Coatings	20	21	26	<1	4	2
Paving	1	10	15	<1	1	1
<b>Maximum Daily Emissions</b>	<b>20</b>	<b>33</b>	<b>26</b>	<b>&lt;1</b>	<b>20</b>	<b>11</b>
<i>SCAQMD Significance Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>

Note that the emissions summarized in Table 4.3-5 are the maximum emissions for each pollutant and that they may occur during different phases of construction. They would not necessarily occur simultaneously. For assessing the significance of the air quality emissions resulting during construction of the hypothetical 5-acre mixed-use project, the construction emissions were compared to the SCAQMD Significance Thresholds. As shown in Table 4.3-5, the 5-acre mixed-use project would not result in air emissions that would exceed the applicable thresholds. However, if several of these projects were to occur simultaneously, there is the potential to exceed significance thresholds.

The Open Space and Resource Conservation Element of the 2021 GPU addresses the implementation of Construction Best Management Practices at all construction sites consistent with SCAQMD rules and regulations. The following regulatory requirements would be required for all construction activities:

- Construction activities will be conducted in compliance with California Code of Regulations, Title 13, Section 2449, which requires that nonessential idling of construction equipment is restricted to five minutes or less.

- Construction activities will be conducted in compliance with any applicable SCAQMD rules and regulations, including but not limited to:
  - Rule 403, Fugitive Dust, for controlling fugitive dust and avoiding nuisance.
  - Rule 402, Nuisance, which states that a project shall not “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.”
  - Rule 1113, which limits the volatile organic compound content of architectural coatings.
  - Rule 1466, Soil Disturbance. Projects that involve earth-moving activities of more than 50 cubic yards of soil with applicable toxic air contaminants are subject to this rule.

The modeled project is illustrative only. Approval of the project would not specifically permit the construction of an individual project, and no specific development details are available at this program level of analysis. The thresholds presented above would be applied to future development within the Planning Area on a project-by-project basis and are not used for assessment of regional planning impacts. The information is presented to illustrate the potential scope of air impacts for a site-specific project that could be developed in the future. Additionally, the regulations at the federal, state, and local level provide a framework for developing project-level air quality protection measures for future projects. The City’s process for the evaluation of future development implemented under the project, which could include site-specific projects that are larger than the one evaluated in this analysis, would include environmental review and documentation pursuant to CEQA, as well as an analysis of those site-specific projects for consistency with the goals, policies and recommendations of the 2021 GPU. In addition to regulatory measures outlined above, mitigation imposed at the project-level may include extension of construction schedules and/or use of special equipment and emission control measures.

While individual site-specific projects may not exceed the SCAQMD regional significance thresholds, the scale and extent of construction activities associated with buildout of the Planning Area may result in some instances where future development would exceed the relevant SCAQMD thresholds. Therefore, construction-related regional air quality impacts would be potentially significant

## **b. Operation**

Pollutant emissions from buildout of all land uses within the Planning Area would far exceed project-level SCAQMD Significance Thresholds (see Table 4.3-3). However, project-level standards are not appropriate for a program-level analysis, as the thresholds are conservative and intended to ensure many individual projects would not obstruct the timely attainment of the national and state ambient air quality standards. Generally, discretionary, program-level planning activities, such as general plans, community plans, specific plans, etc., are evaluated for consistency with the local air quality plan. In contrast, project-level



thresholds are applied to individual project-specific approvals, such as a proposed development project. Therefore, the analysis of the project is based on the future emissions estimates and related to attainment strategies derived from the existing 2006 General Plan. At the program level, the analysis compares emissions generated by project buildout to emissions generated under buildout of the existing 2006 General Plan to determine if the emissions would exceed the emissions estimates included in the AQMP, and to determine whether it would obstruct attainment, or result in an exceedance of AAQS, that would result in the temporary or permanent exposure of persons to unhealthy concentrations of pollutants. As such, this analysis evaluates the potential for future development within the city to result in a cumulatively considerable net increase in emissions based on the change in pollutant emissions that would result from buildout of the existing 2006 General Plan in the year 2040 compared to the proposed 2021 GPU in the year 2040. Emissions are summarized in Table 4.3-4. As shown, buildout of the 2021 GPU would result in a decrease in emissions compared to buildout of the existing 2006 General Plan.

The regulations at the federal, state, and local levels provide a framework for developing project-level air quality protection measures for future site-specific projects that could be developed in the future. The City's process for evaluation of future development that could be implemented under the project would also include environmental review and documentation pursuant to CEQA, as well as an analysis of those site-specific projects for consistency with the goals, policies, and recommendations of the 2021 GPU. The 2021 GPU includes key goals to increase the use of public transit, improve traffic congestion, and enhance the range of transportation options in the City and reduce VMT, thereby reducing mobile emissions and improve air quality. Additionally, the CAP includes a number GHG reduction goals that would also reduce emission of criteria pollutants. These measures are discussed in detail in Section 4.8. In general, implementation of the policies in the 2021 GPU would reduce air quality impacts through implementation of 2021 GPU policies and actions as well as the proposed CAP reduction measures. Further, as a part of the process for the evaluation of future development projects, air quality impacts would be evaluated using SCAQMD guidelines, regional emissions thresholds, and LSTs. Projects that would exceed the SCAQMD significance thresholds would be required to implement project-level reduction measures to reduce potential impacts. The following project-level emission reduction measures could be implemented for future site-specific projects that would reduce emissions from on-road mobile sources that generate and attract heavy-duty diesel-fueled trucks:

- To facilitate implementation of the 2021 GPU's Environmental Justice Action EJ.1-D, which requires the City work with the distribution and warehousing business community to plan for zero emission trucks and vans, the City should consider the use of zero emission (ZE) or near zero emission (NZE) heavy-duty trucks by future distribution and warehouse development projects during operation such as trucks with natural gas engines that meet CARB's adopted optional NO<sub>x</sub> emission standard of 0.02 grams per brake horsepower-hour, if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule and the Heavy-Duty Low NO<sub>x</sub> Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

- Limit the daily number of trucks allowed at the future distribution and warehouse development projects to the levels analyzed in the subsequent, project-level environmental analyses for these projects. If higher daily truck volumes are anticipated to visit the site, additional analysis should be done through CEQA prior to allowing this higher activity level.
- To help facilitate implementation of the 2021 GPU's Environmental Justice Action EJ.1-E, which requires the City to study the feasibility of promoting electric vehicles (EV) and requiring minimum supporting EV infrastructure, the City should use the results of the feasibility study to help inform the provision of EV charging stations or at a minimum, require future distribution and warehouse development projects to provide the electrical infrastructure and electrical panels, which should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Project-level air quality mitigation measures for operational air quality impacts from other area sources that the City should consider for future site-specific distribution and warehouse development projects may include the following:

- Promote and incentivize solar installations on new and existing industrial and warehousing facilities through partnerships with energy providers.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

The project would not conflict with implementation of the AQMP, and emissions associated with project buildout would be less than emissions associated with buildout of the existing 2006 General Plan. Therefore, the project would not result in a cumulatively considerable net increase in any criteria pollutant, and impacts would be less than significant.

### **4.3.5.3 Topic 3: Sensitive Receptors**

*Would the project expose sensitive receptors to substantial pollutant concentrations?*

#### **a. Localized Carbon Monoxide Hot Spots**

A CO hot spot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near congested intersections where idling and queuing occurs. Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. In 2007, the Basin was designated in attainment for CO under both the CAAQS and NAAQS. The CO hotspot analysis conducted by the SCAQMD for the CO attainment did not predict a violation of CO standards at the busiest intersections in Los Angeles during the peak morning and afternoon periods. The SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for CO indicate that peak CO concentrations in the years before the attainment redesignation were a result of unusual meteorological and topographical conditions and not of congestion

at a particular intersection (SCAQMD 1992, 2003). Under existing and future vehicle emission rates, the Bay Area Air Quality Management District found that a 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 (Bay Area Air Quality Management District 2017). The project would not result in an increase in traffic at any intersection that would exceed these volumes described above. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations associated with CO hot spots, and impacts would be less than significant.

## **b. Toxic Air Emissions**

### ***Construction***

Construction of future development and associated infrastructure implemented under the project would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Construction would result in the generation of diesel-exhaust diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities and on-road diesel equipment used to bring materials to and from project sites.

Generation of DPM from construction projects typically occurs in a single area for a short period. According to the Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (Office of Environmental Health Hazard Assessment 2015). Therefore, if the duration of proposed construction activities near any specific sensitive receptor were a year, the exposure would be three percent of the total exposure period used for health risk calculation.

Considering this information, the highly dispersive nature of DPM, and the fact that construction activities would occur intermittently and at various locations over the lifetime of project buildout, DPM generated by construction is not expected to create conditions where the probability is greater than 10 in 1 million of developing cancer for the Maximally Exposed Individual, or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than 1 for the Maximally Exposed Individual. Additionally, with ongoing implementation of USEPA and CARB requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types; the DPM emissions of individual equipment would be substantially reduced over the years as project buildout continues. Therefore, the project would not expose sensitive receptors to toxic air emissions during construction of future development within the Planning Area, and impacts would be less than significant.

### ***Stationary Sources***

The project includes land uses that may generate air pollutants affecting adjacent sensitive land uses. In air quality terms, individual land uses that emit air pollutants in sufficient quantities are known as stationary sources. The primary concern with stationary sources is

local; however, they also contribute to air pollution in the Basin. Various industrial and commercial processes (e.g., manufacturing, dry cleaning) allowed under the proposed 2021 GPU land use plan would be expected to release TACs. Industrial land uses, such as chemical processing facilities, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities, have the potential to be substantial stationary sources that would require a permit from the SCAQMD. These types of uses would largely be located within areas designated within the Industrial zoning designation in the western portion of the city, or the Industrial designation of the Moreno Valley Industrial Area Specific Plan in the southern portion of the city east of March Air Reserve Base (subject to airport land use compatibility requirements). With proximity to residential, the Business Flex use, which would be located on the north side of Alessandro Boulevard, would allow warehousing and some manufacturing but only with indoor operations so it is not anticipated that uses such as a chemical processing facility or chrome plating facility would be permitted. Emissions of TACs would be regulated by SCAQMD through permitting and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under SCAQMD Rule 1401.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. In accordance with AB 2588, if adverse health impacts exceeding public notification levels are identified, the facility would provide public notice, and if the facility poses a potentially significant public health risk, the facility would be required to submit a risk reduction audit and plan to demonstrate how the facility would reduce health risks. Future project-level design considerations that could be considered for future site-specific distribution and warehouse development projects to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer (wayfinding) signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design a future distribution and warehouse development project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the project site.
- Design a future distribution and warehouse development project such that any check-in point for trucks is inside the project site to ensure that there are no trucks queuing outside.
- Design a future distribution and warehouse development project to ensure that truck traffic inside the project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the future distribution and warehouse development project site.

Therefore, adherence with this regulatory framework would ensure that future development would not expose sensitive receptors to TACs associated with stationary sources within the Planning Area, and impacts would be less than significant.

### ***Mobile Sources***

In April 2005, CARB published the Air Quality and Land Use Handbook: A Community Health Perspective (CARB 2005). The handbook makes recommendations directed at protecting sensitive land uses from air pollutant emissions, while balancing a myriad of other land use issues (e.g., housing, transportation needs, economics, etc.). It notes that the handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. As reflected in the CARB Handbook, there is currently no adopted standard for the significance of health effects from mobile sources. Therefore, the CARB has provided guidelines for the siting of land uses near heavily traveled roadways. Of pertinence to this impact analysis, the CARB guidelines indicate that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles/day should be avoided when possible.

I-215 extends north-south along the western city boundary and SR-60 extends east-west through the center of the Planning Area. There are currently two residential use areas within the city that are located within 500 feet of I-215 – the multi-family uses adjacent to Box Springs Road and Morton Road and the single family residential uses located adjacent to Old 215 Frontage Road between Eucalyptus Avenue and Dracaea Avenue. The project would not change the land use designations of these residential areas, and none of the proposed land uses changes would place new residential uses within 500 feet of I-215. There are existing residential uses located along the SR-60 corridor within 500 feet of SR-60, and the project would introduce mixed-use and residential density changes along this corridor within 500 feet of SR-60.

However, CARB notes that these recommendations are advisory and should not be interpreted as defined “buffer zones,” and that local agencies must balance other considerations such as transportation needs, the benefits of urban infill, community economic development priorities, and other quality-of-life issues. With careful evaluation of exposure, health risks, and affirmative steps to reduce risk, where necessary, CARB’s position is that infill development, mixed use, higher density, transit-oriented development, and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level. Additionally, measures can be incorporated into future site-specific project design that would reduce the level of exposure for future residents. The CAPCOA published a guidance document, *Health Risk Assessments for Proposed Land Use Projects*, which provides recommended measures that reduce concentrations of DPM (CAPCOA 2009). These include planting vegetation between the receptor and the freeway, constructing barriers between the receptor and the freeway, and installing newer electrostatic filters (Minimum Efficiency Reporting Value [MERV] 13 or greater) in adjacent receptor buildings. One goal of the Environmental Justice Element of the proposed 2021 GPU is to reduce pollution exposure and improve community health. To achieve this goal, the 2021 GPU proposes the following:

- Strategies to address air and water quality, hazardous materials remediation;
- Encourage healthy development features in private development projects to assist private development with tools to promote health and quality of life; and
- Explore buffering of residential and mixed use development adjacent to freeways, major roadways, and industrial uses consistent with State regulations.

Additionally, a goal of the Open Space and Resource Conservation Element is to minimize air, soil, and water pollution as well as community exposure to hazardous conditions. To achieve this goal, the 2021 GPU proposes the following:

- Buffering and air filtration in residential buildings on high-traffic corridors, consistent with State standards.

Consistent with the goals of CARB's handbook, the 2021 GPU proposes goals and policies that would ensure that site-specific planning and building design of future development would minimize exposure of sensitive receptors to mobile source emissions. As a part of project review and documentation, project-level health risk reduction strategies for sensitive land uses in close proximity to freeways will be evaluated, and if necessary, a site-specific mobile source Health Risk Assessment analysis would be conducted following SCAQMD guidance provided in *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* (SCAQMD 2003). Implementation of the 2021 GPU policies and actions, future environmental review and documentation, and implementation of 2019 Title 24 requirements would reduce health risks to sensitive receptors within 500 feet of SR-60. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations associated with mobile source emissions and impacts would be less than significant.

#### 4.3.5.4 Topic 4: Odor

*Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

A potential odor impact can occur from two different situations: (1) the project would introduce receptors (people) in a location where they would be affected by an existing or future planned odor source, or (2) future land uses would generate odors that could adversely affect a substantial number of persons.

Emissions from construction equipment, such as diesel exhaust, and VOCs from architectural coatings and paving activities may generate odors; however, these odors would be temporary, intermittent, and not expected to affect a substantial number of people. Additionally, noxious odors would be confined to the immediate vicinity of construction equipment. By the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality concern. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Therefore,

construction would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

The type of facilities that are considered to generate objectionable odors during operation include wastewater treatments plants, landfills, and paint/coating operations (e.g., auto body shops), among others. The project would allow for development of a variety of land uses within the Planning Area. While specific developments within the Planning Area are not known at this program level of analysis, planned land uses would not encourage or support uses that would be associated with significant odor generation. The proposed land use plan was developed based on the existing nature of the Planning Area, which includes residential uses in close proximity to commercial areas. Odor generation is generally confined to the immediate vicinity of the source. A typical use in the Planning Area that would generate odors would be restaurants, which can create odors from cooking activities that would not generally be considered adverse. Odors associated with future development would be similar to existing uses throughout the Planning Area. Furthermore, objectionable odors associated with future development may be reported to the SCAQMD, which resolves complaints through investigation within one business day of the received complaint, and issuance of Notices to Comply/Notices of Violation, when necessary. Therefore, design of the project's proposed land use map and adherence to existing regulations would ensure that future development would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

## **4.3.6 Cumulative Analysis**

### **4.3.6.1 Topic 1: Air Quality Plans**

The cumulative study area would be considered the Basin. The project level analysis presented in Section 4.3.5.1 evaluated project consistency with the AQMP. This impact analysis was cumulative in nature because it considers project consistency with a regional air quality plan that relies on the land use plans of jurisdictions within the Basin. As discussed in Section 4.3.5.1 above, the project buildout would generate fewer emissions compared to the existing 2006 General Plan. The project would not exceed the assumptions used to develop the AQMP, and the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. Therefore, the project would not contribute to a cumulative impact related to conflicts with an applicable air quality plan.

### **4.3.6.2 Topic 2: Criteria Pollutants**

#### **a. Construction**

The cumulative study area related to criteria pollutants would be the Planning Area. As discussed in Section 4.5.3.2.a above, the City's process for the evaluated future development implemented under the project would include environmental review and documentation pursuant to CEQA, as well as an analysis of those site-specific projects for consistency with the goals, policies and recommendations of the 2021 GPU. While individual site-specific

projects may not exceed the SCAQMD regional significance thresholds, the scale and extent of construction activities associated with buildout of the Planning Area may result in some instances where future development would exceed the relevant SCAQMD thresholds. Therefore, cumulative construction-related regional air quality impacts would be potentially significant.

## **b. Operation**

Regarding operational emissions, for purposes of this program level analysis, consistency with the AQMP was considered the applicable threshold since the SCAQMD's project specific air quality impact screening levels shown in Table 4.3-3 would not be applicable to a community wide plan update. As discussed in Section 4.3.5.2.b above, project buildout would generate fewer emissions than what was used in the assumptions used to develop the AQMP. Therefore, the project would not contribute to a cumulative operational impact associated criteria pollutants.

### **4.3.6.3 Topic 3: Sensitive Receptors**

The cumulative study area for potential impacts associated with sensitive receptors would be the Planning Area.

#### **a. CO Hot Spots**

As discussed in Section 4.3.5.3 above, project buildout is not anticipated to result in a CO hot spot. Since CO hot spots are a localized phenomenon, the project would not contribute to a cumulative impact related to exposure of sensitive receptors to substantial pollutant concentrations associated with CO hot spots.

#### **b. Toxic Air Emissions**

##### ***Construction***

Considering the highly dispersive nature of DPM and the fact that construction activities would occur intermittently and at various locations over the lifetime of project buildout, construction of future development would not expose sensitive receptors to substantial DPM concentrations. Therefore, the project would not contribute to a cumulative impact related to exposure of sensitive receptors to substantial pollutant concentrations associated with DPM concentrations.

##### ***Stationary Sources***

As discussed in Section 4.3.5.3 above, emissions of TACs from permitted stationary sources would be controlled by SCAQMD through permitting and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under SCAQMD Rule 1401. These requirements would extend to land uses within the Planning Area in addition to land uses within the Basin as a whole. Therefore, existing laws are in place that require evaluation and reduction of risks for individual projects developed in



accordance with applicable and use plans. Site-specific evaluation of health risks associated with stationary sources cannot be conducted at a program level of review, as the project does not include specific development proposals. Nevertheless, compliance with existing regulations would ensure that the project would not contribute to a cumulative impact related to exposure of sensitive receptors to TACs associated with stationary sources.

### ***Mobile Sources***

Development of cumulative projects within the Planning Area would not exacerbate health effects since the evaluation is location specific considering exposure to contaminants at a specific location. Therefore, the project would not contribute to a cumulative impact related to exposure of sensitive receptors to substantial pollutant concentrations associated with mobile source emissions.

#### **4.3.6.4 Topic 4: Odor**

For purposes of odor impacts, the cumulative study area would be the Planning Area. The project level analysis presented in Section 4.3.5.4 above evaluated impacts associated with project buildout, and therefore was cumulative in nature. This analysis determined that implementation of the project would not result in a significant cumulative odor impact. Additionally, odors are typically confined to the immediate area surrounding their source, and therefore would not combine with other sources of odor to produce a cumulative impact. Therefore, the project would not contribute to a cumulative impact related to emissions (such as those leading to odors) adversely affecting a substantial number of people.

### **4.3.7 Significance of Impacts before Mitigation**

#### **4.3.7.1 Topic 1: Air Quality Plans**

The project would not exceed the assumptions used to develop the AQMP, and the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. Therefore, the project would not conflict with implementation of the AQMP, and impacts would be less than significant.

#### **4.3.7.2 Topic 2: Criteria Pollutants**

##### **a. Construction**

The scale and extent of construction activities associated with buildout of the Planning Area could exceed the relevant SCAQMD thresholds for some projects. Construction impacts would be potentially significant.

## **b. Operation**

The project would not conflict with implementation of the AQMP, and emissions associated with project buildout would be less than emissions associated with buildout of the existing 2006 General Plan. Therefore, the operation of the project would not result in a cumulatively considerable net increase in emissions, and impacts would be less than significant.

### **4.3.7.3 Topic 3: Sensitive Receptors**

#### **a. CO Hot Spots**

The project would not result in an increase in traffic volumes at any intersection that would create or contribute to a CO hot spot. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations associated with CO hot spots, and impacts would be less than significant.

#### **b. Toxic Air Emissions**

##### ***Construction***

Considering the highly dispersive nature of DPM, ongoing implementation of USEPA and CARB requirements, and the fact that construction activities would occur intermittently and at various locations over the lifetime of project buildout, construction of future development would not expose sensitive receptors to substantial DPM concentrations. Therefore, the project would not expose sensitive receptors to toxic air emissions, and impacts would be less than significant.

##### ***Stationary Sources***

Emissions of TACs would be controlled by SCAQMD through permitting and would be subject to further study and health risk assessment prior to the issuance of any necessary air quality permits under SCAQMD Rule 1401. Therefore, adherence with this regulatory framework would ensure that future development would not expose sensitive receptors to TACs associated with stationary sources within the Planning Area, and impacts would be less than significant.

##### ***Mobile Sources***

Consistent with the goals of CARB's handbook, the 2021 GPU proposes goals and policies to ensure site-specific planning and building design of future development would minimize exposure of sensitive receptors to mobile source emissions. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations associated with mobile source emissions, and impacts would be less than significant.

#### 4.3.7.4 Topic 4: Odor

Construction odors would be temporary, intermittent, and not expected to affect a substantial number of people. The project's proposed land use map and adherence to existing regulations would ensure that future development would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

### 4.3.8 Mitigation

#### 4.3.8.1 Topic 1: Air Quality Plans

Impacts would be less than significant. No mitigation is required.

#### 4.3.8.2 Topic 2: Criteria Pollutants

##### a. Construction

Impacts related to construction emissions would be significant and the following mitigation shall be applied to future development:

**AQ-1:** Applications for future development, wherein the Director of Community Development or his or her designee has determined a potential for air quality impacts associated with construction, shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City for review and approval. The Director of Community Development or his or her designee shall make this determination based on the size of the project, whether the project would require a transportation impact analysis, or other criteria. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality regional and local impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's adopted regional and localized construction CEQA thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions could include, but are not limited to:

- Require fugitive-dust control measures that exceed SCAQMD's Rule 403 requirements, such as:
  - Use of nontoxic soil stabilizers to reduce wind erosion.
  - Apply water every four hours to active soil-disturbing activities.
  - Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.

- Encourage the use of construction equipment equal to or greater than 50 horsepower be electrically powered or alternatively fueled. At a minimum, Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 Final (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. Include this requirement in applicable bid documents, purchase orders, and contracts.
- Ensure that construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limit nonessential idling of construction equipment to no more than five consecutive minutes.
- Limit on-site vehicle travel speeds on unpaved roads to 15 miles per hour.
- Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area.
- Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the SCAQMD's website.

## **b. Operation**

Impacts would be less than significant. No mitigation is required.

### **4.3.8.3 Topic 3: Sensitive Receptors**

Impacts would be less than significant. No mitigation is required.

### **4.3.8.4 Topic 4: Odor**

Impacts would be less than significant. No mitigation is required.

## **4.3.9 Significance of Impacts after Mitigation**

### **4.3.9.1 Topic 1: Air Quality Plans**

Impacts would be less than significant. No mitigation is required.

### **4.3.9.2 Topic 2: Criteria Pollutants**

#### **a. Construction**

Buildout of the project would occur over a period of approximately 20 years or longer. Construction activities associated with buildout of the project could generate short-term emissions that exceed the SCAQMD's significance thresholds during this time and cumulatively contribute to the nonattainment designations of the Basin. Implementation of mitigation measure AQ-1 would reduce criteria air pollutant emissions from construction-related activities to the extent feasible. However, construction time frames and equipment

for site-specific development projects are not available at this time, and there is a potential for multiple development projects to be constructed at one time, resulting in significant construction-related emissions. Therefore, despite adherence to mitigation measure AQ-1, impacts associated with criteria pollutants would remain significant and unavoidable.

## **b. Operation**

Impacts would be less than significant. No mitigation is required.

### **4.3.9.3 Topic 3: Sensitive Receptors**

Impacts would be less than significant. No mitigation is required.

### **4.3.9.4 Topic 4: Odor**

Impacts would be less than significant. No mitigation is required.

## 4.4 Biological Resources

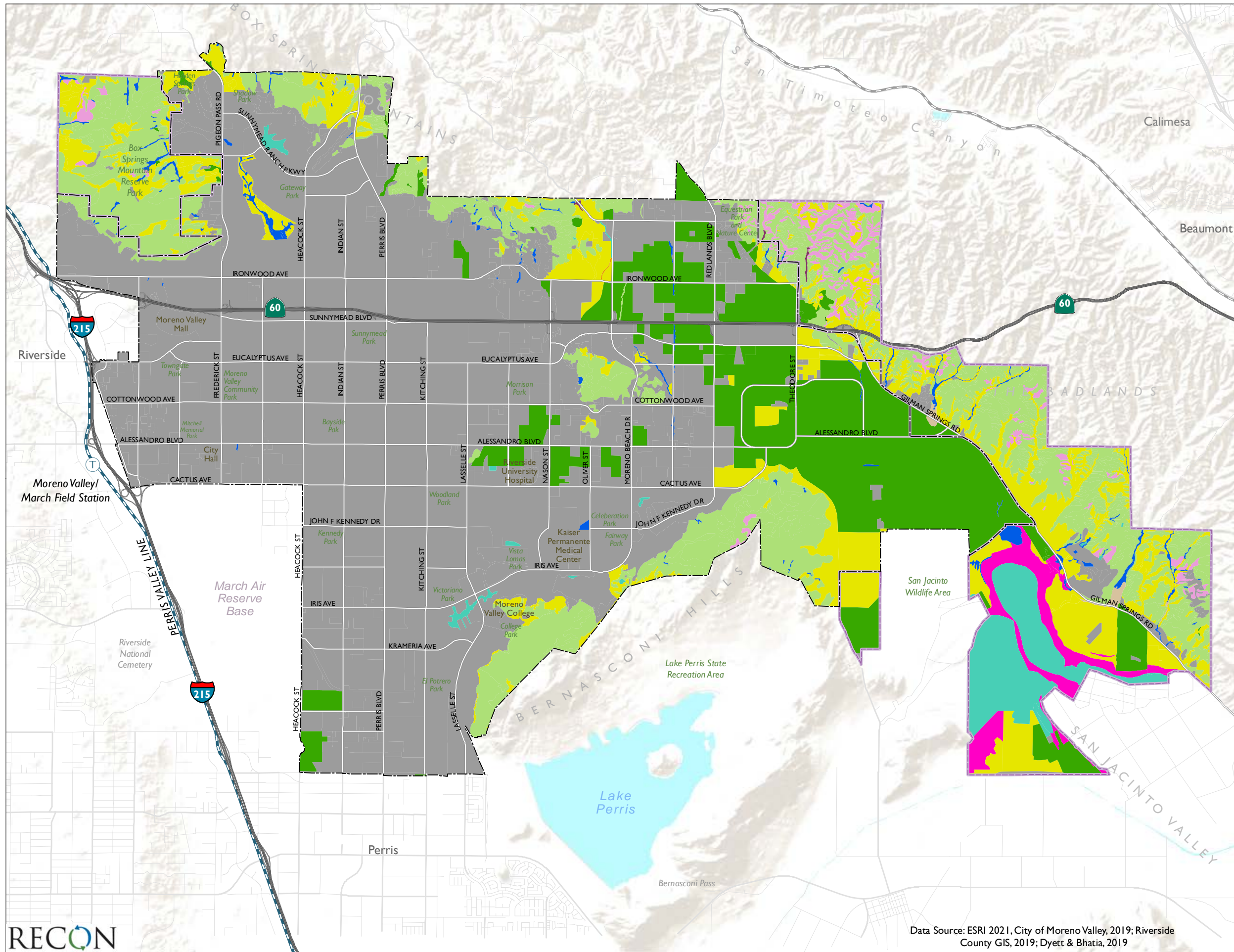
This section analyzes potentially significant impacts related to biological resources that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the entire city of Moreno Valley (city) and sphere of influence (SOI), which are collectively referred to as the Planning Area. Within the analysis, Concept Areas refers to those areas where the GPU proposes land use changes as shown on Figure 3-1. This analysis relies on secondary source information, existing biological resources databases and literature, and vegetation data available from the Western Riverside County Regional Conservation Authority.

### 4.4.1 Existing Conditions

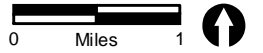
Undeveloped lands within the city are typically comprised of disturbed lands and non-native grasses due to the prior history of cultivation. Small pockets of riparian vegetation occur within urban canyons and native habitats and species that once inhabited the area are largely limited to areas around the city fringes where lands are in proximity to surrounding conserved natural areas. A number of nearby natural areas occur adjacent to the city, including the San Jacinto Wildlife Area.

#### 4.4.1.1 Vegetation Communities

Vegetation communities and land cover types within the city are shown in Figure 4.4-1. The acreage of each of these vegetation communities and land cover types is presented in Table 4.4-1. As shown in Figure 4.4-1, the majority of land within the city consists of Developed/Disturbed Land. Natural vegetation is primarily located in the eastern portion of the city, as well as along the southeastern and northern boundaries of the city. Vegetation communities/land cover types are described further below.



- City of Moreno Valley
- Sphere of Influence
- Vegetation Communities 2012**
- Agricultural Land
- Chaparral
- Coastal Sage Scrub
- Desert Scrub
- Developed/Disturbed Land
- Grassland
- Meadows and Marshes
- Playas and Vernal Pools
- Riparian Scrub, Woodland, Forest
- Riversidean Alluvial Fan Sage Scrub
- Water
- Woodland and Forests



**FIGURE 4.4-1**  
Vegetation Communities

Data Source: ESRI 2021, City of Moreno Valley, 2019; Riverside County GIS, 2019; Dyett & Bhatia, 2019

Vegetation Communities and Land Cover Types	Sum of Acres
<b>Agricultural Land</b>	<b>5,018.35</b>
Cropland, Orchard - Vineyard	4,988.77
Eucalyptus	29.58
<b>Chaparral</b>	<b>44.82</b>
Mixed Chaparral	44.82
<b>Coastal Sage Scrub</b>	<b>3,286.27</b>
Coastal Scrub	3,286.27
<b>Desert Scrub</b>	<b>6.44</b>
Alkali Desert Scrub	6.44
<b>Developed/Disturbed Land</b>	<b>22,814.60</b>
Urban	22,814.60
<b>Grassland</b>	<b>1,678.02</b>
Annual Grassland	1,678.02
<b>Meadows and Marshes</b>	<b>2.08</b>
Fresh Emergent Wetland	2.08
<b>Playas and Vernal Pools</b>	<b>0.16</b>
Wet Meadow	0.16
<b>Riparian Scrub, Woodland, Forest</b>	<b>134.48</b>
Fresh Emergent Wetland	61.11
Valley Foothill Riparian	73.37
<b>Riversidean Alluvial Fan Sage Scrub</b>	<b>3.82</b>
Coastal Scrub	3.82
<b>Water</b>	<b>86.83</b>
Lacustrine	81.49
Riverine, Lacustrine	5.34
<b>Woodland and Forests</b>	<b>1.20</b>
Coastal Oak Woodland	1.20
<b>Grand Total</b>	<b>33,077.06</b>

SOURCE: Western Riverside County Regional Conservation Authority (WRCRCA) 2003.

### a. Agricultural Land

Agriculture refers to lands subject to routine and ongoing commercial operations associated with orchards and vineyards, intensively developed agriculture, such as dairies, nurseries, and chicken ranches, and extensive agriculture such as field pastures and row crops. Well-managed, modern agricultural areas used for commercial row crops, orchards, and vineyards can be devoid of wildlife. However, fields and pastures can provide habitat for native small mammals and foraging habitat for raptors such as northern harrier (*Circus cyaneus*) and red-tailed hawk (*Buteo jamaicensis*). White-faced ibis (*Plegadis chihi*), egret (*Ardea* spp.), crow (*Corvus* spp.), and killdeer (*Charadrius vociferus*) often use fallow or active fields. Agricultural areas are primarily within the eastern portion of the Planning Area with some scattered areas within the central and southern parts of the city.

### b. Chaparral

Chaparral is a vegetation community typically dominated by broad-leaved sclerophyllous shrubs or small trees, and characteristically occupies protected north-facing and canyon slopes or ravines where more mesic conditions are present. Dominant shrubs in this



community are typically five to ten feet tall and may include chamise (*Adenostoma fasciculatum*), manzanita (*Arcostaphylos* spp.), toyon (*Heteromeles arbutifolia*), ceanothus (*Ceanothus* spp.), mission manzanita (*Xylococcus bicolor*), and sugar bush (*Rhus ovata*) (Holland 1986). The vegetation is usually dense, with little or no understory cover, but may include patches of bare soil. Many species in this community are adapted to repeated fires by their ability to stump sprout. Chaparral typically is found in small pockets of habitat within conserved portions of the northern and southern portions of the Planning Area, and throughout the sphere of influence (SOI) and San Jacinto Wildlife Area.

### **c. Coastal Sage Scrub**

Coastal sage scrub is a vegetation community consisting of low-growing, aromatic, drought-deciduous soft-woody shrubs that have an average height of approximately three to four feet. This plant community is typically dominated by facultatively drought deciduous species such as California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), laurel sumac (*Malosma laurina*), California encelia (*Encelia californica*), and black sage (*Salvia mellifera*) (Holland 1986). The community typically is found on low moisture-availability sites with steep, xeric slopes or clay rich soils that are slow to release stored water. These sites often include drier south- and west-facing slopes and occasionally north-facing slopes, where the community can act as a successional phase of chaparral development. Coastal sage scrub intergrades at higher elevations with several types of chaparrals, or in drier more inland areas with Riversidean sage scrub. Coastal sage scrub is found in the northern, central, and southeastern areas of the Planning Area, largely within the Box Springs Mountain Reserve Park, the Lake Perris State Recreational Area, the Badlands, and areas designated for Hillside Residential in the northern portion of the Planning Area.

### **d. Desert Scrub**

Desert scrub is generally dominated by creosote bush (*Larrea tridentata*), burro bush (*Ambrosia dumosa*), brittlebush (*Encelia farinosa*), and ocotillo (*Fouquieria splendens*), which grow from 0.5 to three meters high. The shrubs within this vegetation community are generally widely spaced, usually interspersed with bare ground (Holland 1986). Desert scrub occurs within the Planning Area in small pockets of habitat along the eastern perimeter and extends into the SOI.

### **e. Developed/Disturbed Land**

Developed/disturbed land is composed of areas consisting of business lots, roadways, and development throughout Planning Area. Non-native trees and other horticultural species used in development landscaping provide shade for the open areas and buildings. Developed/disturbed land is the dominant land cover type and found primarily throughout Moreno Valley.

## **f. Grassland**

Grassland is a vegetation community characterized by a dense to sparse cover of annual grasses reaching to three feet high, which may include numerous native wildflowers, particularly in years of high rainfall. Grasslands contain species including, but not limited to, bromes (*Bromus* spp.), wild oat (*Avena* spp.), ryegrass (*Lolium* spp.), and fescues (*Vulpia* spp.) (Holland 1986). Typically, grasslands include at least 50 percent cover of the entire herbaceous layer attributable to annual non-native grass species, although other plant species (native and non-native) may be intermixed. These annuals germinate with the onset of the rainy season and set seeds in the late winter or spring. This vegetation community is usually found on fine-textured, usually clay soils, that range from being moist or waterlogged in the winter to being very dry during the summer and fall (Holland 1986). Grassland is found within the northern, southern, and eastern portions of Moreno Valley and throughout the SOI.

## **g. Meadows and Marshes**

Meadows and marshes are fresh emergent wetland communities comprised of perennial emergent monocots typically forming a closed canopy. These communities consist of perennial emergent plants such as cattails (*Typha* spp.) and bulrush (*Scirpus* spp.) and can be found in the form of freshwater marsh (Holland 1986). Freshwater marsh vegetation occurs in open bodies of fresh water with little current flow, such as ponds, and to a lesser extent around seeps and springs. Freshwater marshes occur in areas of permanent inundation by freshwater without active streamflow. Approximately two acres of meadows and marshes exist north of State Route 60 (SR-60) in the northern portion of the Planning Area.

## **h. Playas and Vernal Pools**

Vernal pools are shallow, isolated, ephemeral wetlands typically located on flat-topped mesas. The microrelief surrounding vernal pools typically consist of small mima mounds or hummocks and intergrade with alkali playa and alkali grassland habitats. These vegetation communities have a characteristic suite of plant and animal species. Plants within these habitats may be aquatic or may germinate following the drying of the pool. Vernal pool and playa sizes range from very small to large (42 acres and 6,081 acres, respectively within the Planning Area) (WRCRCA 2003). Vernal pools are considered to be basins which pond yearly and alkaline vernal playas are larger areas such as shallow lakes that may only support seasonal flooding and ponding on a less reliable basis, but which possess characteristic soils and vegetation developed in response to periodic flooding and low soil permeabilities. Playas and vernal pools occur around Mystic Lake and other bodies of water southeast of the Planning Area.

## **i. Riparian Scrub, Woodland, Forest**

Riparian scrub, riparian woodland, and riparian forest are dense riparian communities dominated by broad-leaved, winter deciduous trees. The density of the willows often prevents a dense understory of smaller plants from growing. The representative species typically grow

in loose, sandy, or fine gravelly alluvium deposited near stream channels during flood flows. Repeated flooding prevents succession to a community dominated by western sycamore (*Platanus racemose*) and cottonwoods (*Populus* sp.) (Holland 1986). A majority of the riparian scrub, woodland, and forest are located within conserved or public lands such as the Box Springs Mountain Preserve, Poorman Reservoir in the northwest of the Planning Area, and within the Badlands area within the city SOI. Isolated riparian areas exist in other limited undeveloped portions of the city.

### **j. Riversidean Alluvial Fan Sage Scrub**

Riversidean alluvial fan sage scrub is an inland (xeric) form of coastal sage scrub that occurs in washes and on gently sloping alluvial fans. This vegetation community is composed of low-growing, aromatic, drought-deciduous, soft-woody shrubs that have an average height of approximately three to four feet (Holland 1986). These areas flood only occasionally (every five to ten years); therefore, many upland species become established in the streamside habitat. The occasional flooding and sediment reworking; however, is the driving force that maintains this vegetation type and is described as open vegetation adapted to alluvial fans and outwashes. It is dominated by scalebroom (*Lepidospartum squamatum*), which is primarily restricted to floodplain habitats. Other characteristic species for this vegetation community include California buckwheat, white sage (*Salvia apiana*), Tecate tarplant (*Deinandra floribunda*), as well as riparian species such as western sycamore and mule fat (*Baccharis salicifolia*). Less than four acres of this vegetation community is mapped along the northern perimeter of the Planning Area.

### **k. Water**

Open water occurs in several places within the Planning Area. The largest area is mapped as the Mystic Lake, southeast of the Planning Area within the SOI.

### **l. Woodlands and Forests**

Woodlands and forests within the Planning Area are represented as coastal oak woodland, a vegetation community defined as having one primary tree, coast live oak (*Quercus agrifolia*) (Holland 1986). Coastal oak woodlands are present in the coastal slopes of southern California and are typically found on north-facing slopes and shaded ravines in the south and more exposed sites in the north. Less than two acres of this vegetation community occurs in two small patches along the northern perimeter of the Planning Area.

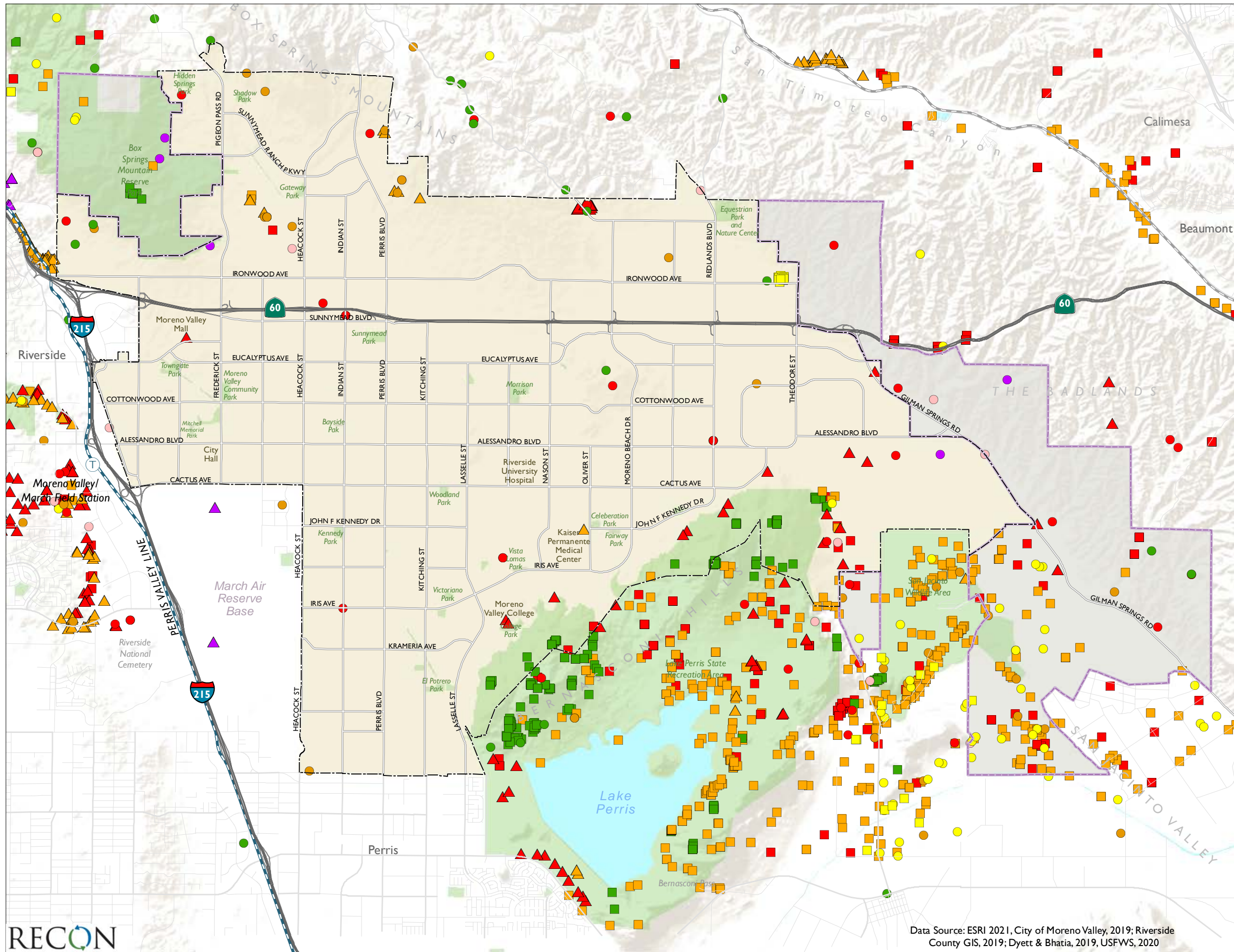
## **4.4.1.2 Western Riverside County Multiple Species Habitat Conservation Plan**

### **a. Sensitive Plants**

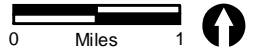
The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) is a comprehensive multi-jurisdictional habitat conservation plan focusing on the conservation of species and their associated habitats. The MSHCP provides coverage (including take

authorization for listed species) for special-status plant and wildlife species, as well as mitigation for impacts to sensitive species. Through agreements with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), the MSHCP designates 146 special-status wildlife and plant species that receive some level of coverage under the plan. Of that total, the majority of these species have no additional survey/conservation requirements and 16 plant species are classified as “narrow endemic species” based on their limited distributions in the region. These narrow endemics are sensitive biological resources; some are also federally or state listed as threatened or endangered. The habitat that supports a narrow endemic species is also considered a sensitive biological resource. Species with potential to occur include plant and wildlife species that occur within habitats or soils conditions that are also present within the city.

A review of the species records from California Natural Diversity Database (CNDDDB) reported within a one-mile buffer was conducted in order to help identify sensitive plant and wildlife species that may potentially occur within the Planning Area. Known locations of sensitive plants within the city are presented in Figure 4.4-2 and summarized in Table 4.4-2. Known sensitive plants within the city are limited to the MSHCP-covered species, southern California black walnut (*Juglans californica*) in the northeastern portion of the city and smooth tarplant (*Centromadia pungens* ssp. *laevis*), within the eastern corner. There is currently no record of any plant species with a federal or state status as endangered, threatened, or rare within the city.



- City of Moreno Valley
- Sphere of Influence
- MSHCP Species**
  - Birds
  - Reptiles
  - Mammals
  - Rare Plants
- USFWS Species Observations**
  - Birds
  - Mammals
  - Invertebrates
- CNDDDB Species Observations**
  - Birds
  - Reptiles
  - Amphibians
  - Invertebrates
  - Mammals
  - Plants



**FIGURE 4.4-2**  
**MSHCP Covered Species,**  
**CNDDDB and USFWS Species**

Data Source: ESRI 2021, City of Moreno Valley, 2019; Riverside County GIS, 2019; Dyett & Bhatia, 2019, USFWS, 2020

<b>Table 4.4-2 Sensitive Plant Species Observed† or Potentially Occurring within the Moreno Valley Planning Area</b>					
<i>Scientific Name</i> Common Name	Sensitivity Code and Status				Habitat Preference/ Requirements
	State	Federal	CNPS Rank	MSHCP Status	
<b>ANGIOSPERMS: MONOCOTS</b>					
<b>LILIACEAE LILY FAMILY</b>					
Plummer's mariposa lily <i>Calochortus plummerae</i>	-	-	4.2	Covered	Perennial herb (bulbiferous); chaparral, coastal sage scrub, cismontane forest, lower coniferous forest, valley foothill grasslands; granitic/rocky locales; blooms May–July. Hybridizes with <i>C. weedi</i> var. <i>intermedius</i> .
<b>THEMIDACEAE BRODIAEA FAMILY</b>					
Thread-leaved brodiaea <i>Brodiaea filifolia</i>	Endangered	Threatened	1B.1	Covered	Cismontane woodland, coastal sage scrub, playas, valley and foothill grassland, vernal pools; often clay soils
<b>ANGIOSPERMS: DICOTS</b>					
<b>ASTERACEAE SUNFLOWER FAMILY</b>					
Smooth tarplant † <i>Centromadia pungens</i> ssp. <i>laevis</i>	-	-	1B.1	Covered	Annual herb; chenopod scrub, meadow and seeps, playas, riparian woodland, valley and foothill grassland, alkaline soils; blooms April–Sept.; elevation less than 1,600 feet. Historical locations may be extirpated.
Coulter's goldfields <i>Lasthenia glabrata</i> ssp. <i>Coulteri</i>	-	-	1B.1	Covered	Annual herb; coastal salt marsh, vernal pools, playas; blooms Feb.–June; elevation less than 4,000 feet.
chaparral ragwort; rayless ragwort; groundsel <i>Senecio aphanactis</i>	-	-	2B.2	-	Annual herb; chaparral, cismontane woodland, coastal sage scrub; blooms January–May; elevation less than 2,700 feet.
Wright's trichocoronis <i>Trichocoronis wrightii</i> var. <i>wrightii</i>	-	-	2B.1	Covered, NE	Annual herb; marshes and swamps, riparian forest and scrub, meadows and seeps, vernal pools; blooms May–Sept.; elevation 20–1,400 feet.
<b>BORAGINACEAE BORAGE FAMILY</b>					
Mud nama <i>Nama stenocarpa</i>	-	-	2B.2	Covered	Annual/perennial herb; marshes and swamps, lake margins, riverbanks; blooms January–July; elevation less than 1,700 feet.

<b>Table 4.4-2 Sensitive Plant Species Observed† or Potentially Occurring within the Moreno Valley Planning Area</b>					
<i>Scientific Name</i> Common Name	Sensitivity Code and Status				Habitat Preference/ Requirements
	State	Federal	CNPS Rank	MSHCP Status	
<b>CHENOPODIACEAE      GOOSEFOOT FAMILY</b>					
San Jacinto Valley crownscale <i>Atriplex coronata</i> var. <i>notatior</i>	-	Endangered	1B.1	Covered	Annual herb; layas, mesic valley foothill grasslands, vernal pools; alkaline locations; blooms April–Aug.; elevation 1,250–1,650 feet. Endemic to San Jacinto Valley.
Davidson’s saltscale <i>Atriplex serenana</i> var. <i> davidsonii</i>	-	-	1B.2	Covered	coastal bluff scrub, coastal sage scrub, alkaline soil
<b>BRASSICACEAE      MUSTARD FAMILY</b>					
Robinson’s peppergrass <i>Lepidium virginicum</i> var. <i>robinsonii</i>	-	-	4.3	-	Annual herb; coastal sage scrub, chaparral; blooms January–July; elevation less than 2,900 feet.
<b>JUGLANDACEAE      WALNUT FAMILY</b>					
Southern California black walnut † <i>Juglans californica</i>	-	-	4.2	Covered	Deciduous tree; chaparral, cismontane woodland, coastal sage scrub; blooms March–May; elevation less than 3,000 feet. Walnut forest rare and declining community.
<b>NYCTAGINACEAE      FOUR O’CLOCK FAMILY</b>					
Chaparral sand verbena <i>Abronia villosa</i> var. <i>aurita</i>	-	-	1B.1	-	Annual herb; sandy floodplains in inland, arid areas of coastal sage scrub and open chaparral; blooms January–August; elevation 300–5,300 feet.

<b>Table 4.4-2</b>					
<b>Sensitive Plant Species</b>					
<b>Observed† or Potentially Occurring within the Moreno Valley Planning Area</b>					
Scientific Name Common Name	Sensitivity Code and Status				Habitat Preference/ Requirements
	State	Federal	CNPS Rank	MSHCP Status	
<b>POLEMONIACEAE PHLOX FAMILY</b>					
<i>Navarretia fossalis</i> spreading navarretia	-	Threatened	1B.1	Covered, NE	Annual herb; vernal pools, marshes and swamps, chenopod scrub; blooms April–June; elevation 100–4,300 feet.
<b>POLYGONACEAE BUCKWHEAT FAMILY</b>					
Parry's spineflower <i>Chorizanthe parryi</i> var. <i>parryi</i>	-	-	1B.1	Covered	Annual herb; sandy or rocky openings in chaparral, coastal sage scrub; blooms April–June; elevation 120–5,600 feet.
SOURCE: WRCRCA 2003.					
†Present within Planning Area					
<b>MSHCP</b>					
NE = Narrow endemic					
Covered = Multiple Species Habitat Conservation Program covered species					
<b>CALIFORNIA NATIVE PLANT SOCIETY (CNPS): CALIFORNIA RARE PLANT RANKS (CRPR)</b>					
1A = Species presumed extinct.					
1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.					
2A = Plants presumed extirpated in California, but more common elsewhere.					
2B = Species rare, threatened, or endangered in California but more common elsewhere. These species are eligible for state listing.					
3 = Species for which more information is needed. Distribution, endangerment, and/or taxonomic information is needed.					
4 = A watch list of species of limited distribution. These species need to be monitored for changes in the status of their populations.					
.1 = Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat).					
.2 = Species fairly threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat).					
.3 = Species not very threatened in California (<20% of occurrences threatened; low degree and immediacy of threat or no current threats known).					

## b. Sensitive Wildlife

Varied topography and landforms including Box Springs Mountain in the north and the Badlands east of the city provide for a diversity of wildlife species. Mammals such as mule deer can be found in the Box Springs Mountains and in the Badlands. Large carnivores, such as coyotes, bobcats, badgers, and gray fox have been found in the undeveloped portions of the city. Opossums, raccoons, skunks, cottontail rabbits, and rodent species are common to the study area. A wide variety of reptiles are found in the study area. Owls, hawks, and other birds of prey can be seen at various times throughout the year or during migration periods. Wild donkeys (*Equus africanus asinus*) have been documented north of SR-60.



Observed locations of sensitive wildlife observations within the city are based on the California Natural Diversity Database (2021) and USFWS (USFWS 2019), and presented in Figure 4.4-2. Table 4.4-3 provides both observed and potentially occurring species in the Planning Area. Locations of sensitive wildlife observations within the city are primarily located in the southeastern portion of the city adjacent to the Lake Perris State Recreation Area, as well as some areas along the eastern and northern boundaries of the city.

<b>Table 4.4-3 Sensitive Wildlife Species Observed† or Potentially Occurring within the Moreno Valley Planning Area</b>				
Species' Common Name/ Scientific Name	State Status	Federal Status	MSHCP Status	Habitat Preference/ Requirements
<b>INVERTEBRATES</b> (Nomenclature from Eriksen and Belk 1999; San Diego Natural History Museum 2002)				
<b>STREPTOCEPHALIDAE FAIRY SHRIMP</b>				
Riverside fairy shrimp <i>Streptocephalus woottoni</i>	-	Endangered	Covered	Vernal pools.
<b>APIDAE HONEY BEES, BUMBLE BEES, AND ALLIES</b>				
Crotch's bumble bee <i>Bombus crotchii</i>	Candidate Endangered	-	-	Coastal areas, open grasslands, shrub habitats.
<b>AMPHIBIANS</b> (Nomenclature from Crother et al. 2017)				
<b>PELOBATIDAE SPADEFOOT TOADS</b>				
Western spadefoot † <i>Spea hammondi</i>	Species of Concern	-	Covered	Vernal pools, floodplains, and alkali flats within areas of open vegetation.
<b>REPTILES</b> (Nomenclature from Crother 2017)				
<b>IGUANIDAE IGUANID LIZARDS</b>				
Coast horned lizard † <i>Phrynosoma blainvillii</i> [= <i>P. coronatum</i> coastal population]	Species of Concern	-	Covered	Chaparral, coastal sage scrub with fine, loose soil. Partially dependent on harvester ants for forage.
<b>TEIIDAE WHIPTAIL LIZARDS</b>				
Belding's orange-throated whiptail † <i>Aspidoscelis hyperythra beldingi</i>	Watch List	-	Covered	Chaparral, coastal sage scrub with coarse sandy soils and scattered brush.
<b>ANNIELLIDAE LEGLESS LIZARDS</b>				
San Diegan legless lizard <i>Anniella stebbensi</i> sp. [=pulchra pulchra]	Species of Concern	-	-	Herbaceous layers with loose soil in coastal scrub, chaparral, and open riparian. Prefers dunes and sandy washes near moist soil.
<b>COLUBRIDAE COLUBRID SNAKES</b>				
California glossy snake <i>Arizona elegans occidentalis</i>	Species of Concern	-	-	Rocky areas in wet locales, such as swamps, damp forests, or riparian woodlands.
<b>CROTALIDAE RATTLESNAKES</b>				
Red diamond rattlesnake † <i>Crotalus ruber</i>	Species of Concern	-	Covered	Desert scrub and riparian, coastal sage scrub, open chaparral, grassland, and agricultural fields.

<b>Table 4.4-3 Sensitive Wildlife Species Observed† or Potentially Occurring within the Moreno Valley Planning Area</b>				
Species' Common Name/ Scientific Name	State Status	Federal Status	MSHCP Status	Habitat Preference/ Requirements
<b>PHRYNOSOMATIDAE SPINY LIZARDS</b>				
Granite spiny lizard † <i>Sceloporus orcutti</i>	-	-	Covered	Wide variety of habitats but is restricted to granite outcrops and boulder fields.
<b>XANTUSIIDAE NIGHT LIZARDS</b>				
Granite night lizard † <i>Xantusia henshawi</i>	-	-	Covered	Flaking granite, rock outcrops, and boulder fields, most commonly with chaparral, sage scrub, mixed conifer forest, and oak woodland.
<b>BIRDS (Nomenclature from Chesser et al. 2019 and CDFW 2021)</b>				
<b>THRESKIORNITHIDAE IBISES</b>				
White-faced ibis (rookery site) <i>Plegadis chihi</i>	Watch List	-	Covered	Freshwater ponds, irrigated fields, brackish lagoons. Migrant and winter visitor, rare in summer. Very localized breeding.
<b>CATHARTIDAE NEW WORLD VULTURES</b>				
Turkey vulture (breeding) † <i>Cathartes aura</i>	-	-	Covered	Nest and roost sites include cliffs, caves, ledges, rock outcrops; and foraging habitats include deciduous forest, woodlands, and scrublands; often seen over farmlands.
<b>ACCIPITRIDAE HAWKS, KITES, &amp; EAGLES</b>				
Cooper's hawk (nesting) † <i>Accipiter cooperii</i>	Watch List	-	Covered	Mature forest, open woodlands, wood edges, river groves. Parks and residential areas.
Ferruginous hawk (wintering) † <i>Buteo regalis</i>	Watch List	-	Covered	Require large foraging areas. Grasslands, agricultural fields. Uncommon winter resident.
<b>CUCULIDAE CUCKOOS &amp; ROADRUNNERS</b>				
Western yellow-billed cuckoo † <i>Coccyzus americanus occidentalis</i>	Endangered	Threatened	Covered	Riparian woodlands. Summer resident. Very localized breeding.
<b>STRIGIDAE TYPICAL OWLS</b>				
Western burrowing owl (burrow sites) <i>Athene cunicularia hypugaea</i>	Species of Concern	-	Covered	Grassland, agricultural land, coastal dunes. Require rodent burrows. Declining resident.
<b>PICIDAE WOODPECKERS &amp; SAPSUCKERS</b>				
Downy woodpecker <i>Picoides pubescens</i>	-	-	Covered	Riparian scrub, woodland, and forest, and oak woodland and forest habitat

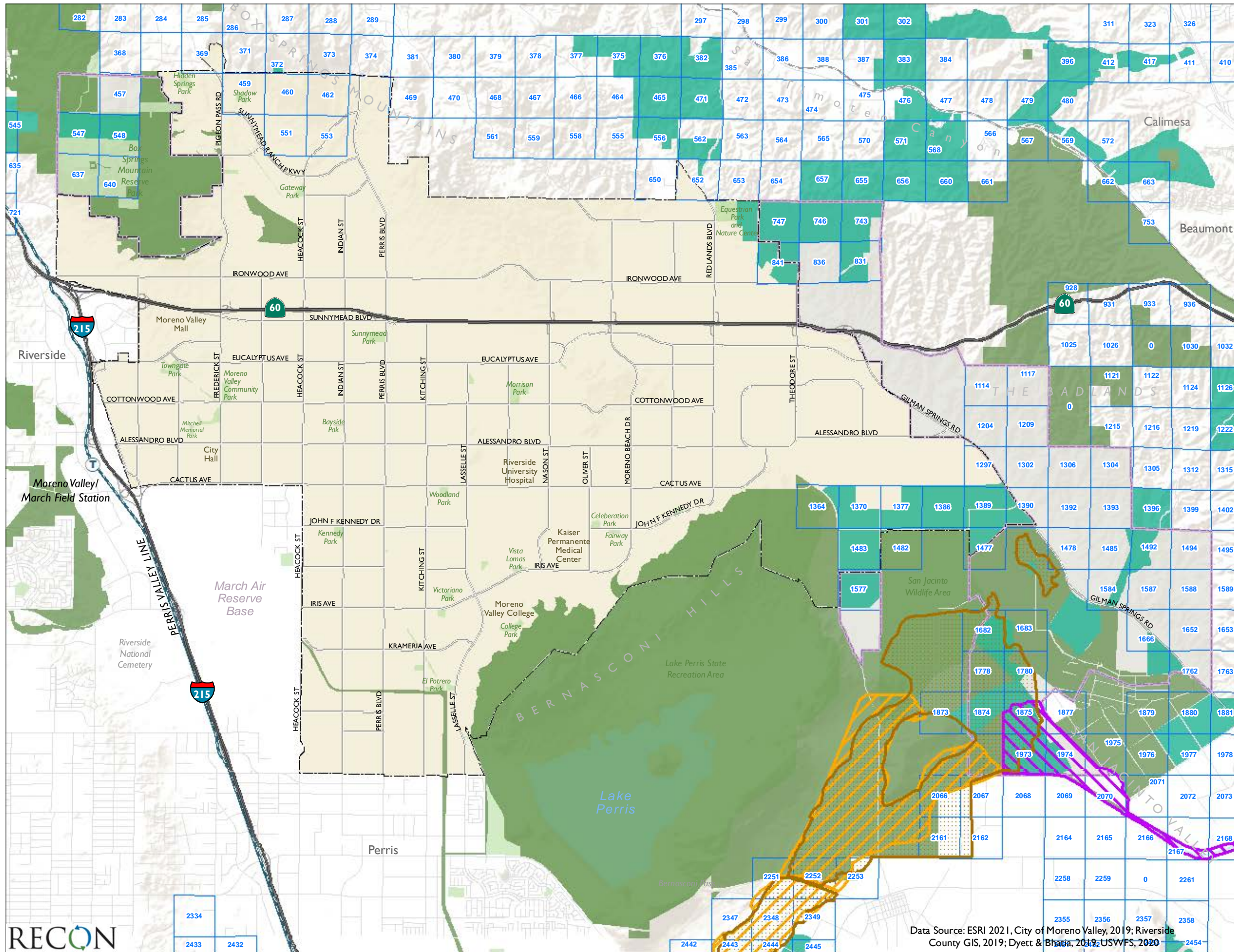
Table 4.4-3 Sensitive Wildlife Species Observed† or Potentially Occurring within the Moreno Valley Planning Area				
Species' Common Name/ Scientific Name	State Status	Federal Status	MSHCP Status	Habitat Preference/ Requirements
<b>TYRANNIDAE TYRANT FLYCATCHERS</b>				
Southwestern willow flycatcher <i>Empidonax traillii extimus</i>	Endangered	Endangered	Covered	Nesting restricted to willow thickets. Also occupies other woodlands. Rare spring and fall migrant, rare summer resident. Extremely localized breeding.
<b>LANIIDAE SHRIKES</b>				
Loggerhead shrike <i>Lanius ludovicianus</i>	Species of Concern	-	Covered	Open foraging areas near scattered bushes and low trees.
<b>VIREONIDAE VIREOS</b>				
Least Bell's vireo (nesting) † <i>Vireo bellii pusillus</i>	Endangered	Endangered	Covered	Willow riparian woodlands. Summer resident.
<b>HIRUNDINIDAE SWALLOWS</b>				
Tree swallow † <i>Tachycineta bicolor</i>	-	-	Covered	Riparian scrub, woodland and forest, and oak woodland and forest within the vicinity of water.
<b>SYLVIIDAE GNATCATCHERS</b>				
Coastal California gnatcatcher † <i>Poliopitila californica californica</i>	Species of Concern	Threatened	Covered	Coastal sage scrub, maritime succulent scrub. Resident.
<b>PARULIDAE WOOD WARBLERS</b>				
Yellow warbler (nesting) <i>Setophaga [=Dendroica] petechia</i>	Species of Concern	-	Covered	Breeding restricted to riparian woodland. Spring and fall migrant, localized summer resident, rare winter visitor.
Yellow-breasted chat (nesting) † <i>Icteria virens auricollis</i>	Species of Concern	-	Covered	Dense riparian woodland. Localized summer resident.
<b>PASSERELLIDAE NEW WORLD PASSERINES</b>				
Southern California rufous-crowned sparrow † <i>Aimophila ruficeps canescens</i>	Watch List	-	Covered	Coastal sage scrub, chaparral, grassland. Resident.
Bell's sage sparrow † <i>Artemisiospiza [=Amphispiza] belli belli</i>	Watch List	-	Covered	Chaparral, coastal sage scrub. Localized resident.
Wilson's warbler † <i>Cardellina pusilla</i>	-	-	Covered	Montane meadows, shrub habitats, and deciduous woodland habitats.
MacGillivray's warbler <i>Geothlypis tolmiei</i>	-	-	Covered	Montane coniferous forest and woodland, riparian scrub, woodland, and forest habitat, oak woodland and forest, chaparral, coastal sage scrub, desert scrub, and Riversidean alluvial fan sage scrub.

<b>Table 4.4-3 Sensitive Wildlife Species Observed† or Potentially Occurring within the Moreno Valley Planning Area</b>				
Species' Common Name/ Scientific Name	State Status	Federal Status	MSHCP Status	Habitat Preference/ Requirements
Lincoln's sparrow † <i>Melospiza lincolni</i>	-	-	Covered	Montane meadow and wet montane meadow and the edges of montane riparian or riparian scrub.
<b>ICTERIDAE</b>				
Tricolored blackbird (nesting) † <i>Agelaius tricolor</i>	Threatened, Species of Concern	-	Covered	Freshwater marshes, agricultural areas, lakeshores, parks. Localized resident.
<b>MAMMALS (Nomenclature from Baker et al. 2003 and Hall 1981)</b>				
<b>VESPERTILIONIDAE                      VESPER BATS</b>				
Western red bat <i>Lasiurus blossevillii</i>	Species of Concern	-	-	Prefers riparian areas dominated by cottonwoods, oaks, sycamores, and walnuts.
Western yellow bat † <i>Lasiurus xanthinus</i>	Species of Concern	-	-	Found in valley foothill riparian, desert riparian, desert washes, and palm oasis habitats.
<b>MOLOSSIDAE                      FREE-TAILED BATS</b>				
Pocketed free-tailed bat <i>Nyctinomops femorosaccus</i>	Species of Concern	-	-	Observed in a variety of habitats, including desert scrub and pine-oak forests.
<b>LEPORIDAE                      RABBITS &amp; HARES</b>				
San Diego black-tailed jackrabbit <i>Lepus californicus bennettii</i>	Species of Concern	-	Covered	Open areas of scrub, grasslands, agricultural fields.
Brush rabbit † <i>Sylvilagus bachmani</i>	-	-	Covered	Chaparral, Diegan coastal sage scrub, Riversidean sage scrub, and alluvial fan sage scrub, riparian and woodland habitats, coniferous forest, and agricultural areas (grove/orchard, and field crops).
<b>HETEROMYIDAE                      POCKET MICE &amp; KANGAROO RATS</b>				
Northwestern San Diego pocket mouse † <i>Chaetodipus fallax fallax</i>	Species of Concern	-	Covered	San Diego County west of mountains in sparse, disturbed coastal sage scrub or grasslands with sandy soils.
Los Angeles little pocket mouse † <i>Perognathus longimembris brevinasus</i>	Species of Concern	-	Covered	Desert riparian, scrub, wash. Coastal scrub and sagebrush. Localized.
San Bernardino kangaroo rat † <i>Dipodomys merriami parvus</i>	Candidate Endangered	Endangered	Covered	Open coastal sage scrub, Riversidean alluvial fan sage scrub, or grasslands; fine, alluvial sands.

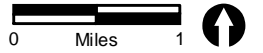
Table 4.4-3 Sensitive Wildlife Species Observed† or Potentially Occurring within the Moreno Valley Planning Area				
Species' Common Name/ Scientific Name	State Status	Federal Status	MSHCP Status	Habitat Preference/ Requirements
Stephens' kangaroo rat † <i>Dipodomys stephensi</i>	Threatened	Endangered	Covered	Grassland and open areas with less than 50% cover. Prefers areas dominated by filaree ( <i>Erodium</i> spp.) and annual brome grasses ( <i>Bromus</i> spp). Well-drained and friable (easy to dig) soils.
<b>MURIDAE OLD WORLD MICE &amp; RATS (I)</b>				
Southern grasshopper mouse <i>Onychomys torridus ramona</i>	Species of Concern	-	-	Alkali desert scrub & desert scrub preferred. Can also occur in succulent shrub, wash, & riparian areas; coastal sage scrub, mixed chaparral, sagebrush, low sage, and bitterbrush. Low to moderate shrub cover preferred.
<b>CANIDAE CANIDS</b>				
Coyote † <i>Canis latrans</i>	-	-	Covered	Primary habitats include grasslands, short-grass prairies, semiarid sagebrush, and broken forests. Also found in urban settings.
SOURCE: WRCRCA 2003. †Observed within Moreno Valley based on CDFW 2021 or USFWS 2019. <b>MSHCP</b> Covered = Multiple Species Habitat Conservation Program covered species.				

### c. Public/Quasi-Public Lands

As a part of the MSHCP Conservation Area lands, approximately 347,000 acres of lands known as Public/Quasi-Public Lands were established and occur within public/private ownership which contribute towards the conservation of Covered Species (including lands contained in existing reserves). Public/Quasi-Public lands within and adjacent to the Planning Area are shown on Figure 4.4-3.



- City of Moreno Valley
- Sphere of Influence
- Criteria Cells
- MSHCP Conserved Lands
- Public/Quasi-Public Lands
- San Bernardino Kangaroo Rat Final Critical Habitat
- Spreading Navarretia Final Critical Habitat
- San Jacinto Valley Crownscale Proposed Critical Habitat



**FIGURE 4.4-3**  
MSHCP Covered Lands  
and Criteria Cells

Data Source: ESRI 2021, City of Moreno Valley, 2019; Riverside County GIS, 2019; Dyett & Bhatia, 2019; USWFS, 2020



#### **d. Criteria Cells and MSHCP Conserved Lands**

The MSHCP designates Criteria Area boundaries, which contain cells (termed ‘Criteria Cells’) approximately 160 acres in size that have been identified as having conservation potential. The establishment of Criteria Area boundaries is intended to facilitate the process by which jurisdictions will evaluate property that may be needed for inclusion in the MSHCP Conservation Area. The Criteria Area is an analytical tool within which property will be evaluated using MSHCP Conservation Criteria to determine what properties are needed for the MSHCP Conservation Area and does not impose land use restrictions. Public and private development within the Criteria Area that is determined to be consistent with the MSHCP Conservation Criteria is considered a Covered Activity, and land not needed for the MSHCP Conservation Area shall receive Take Authorization for Covered Species Adequately Conserved through the permits issued by jurisdictions pursuant to the MSHCP.

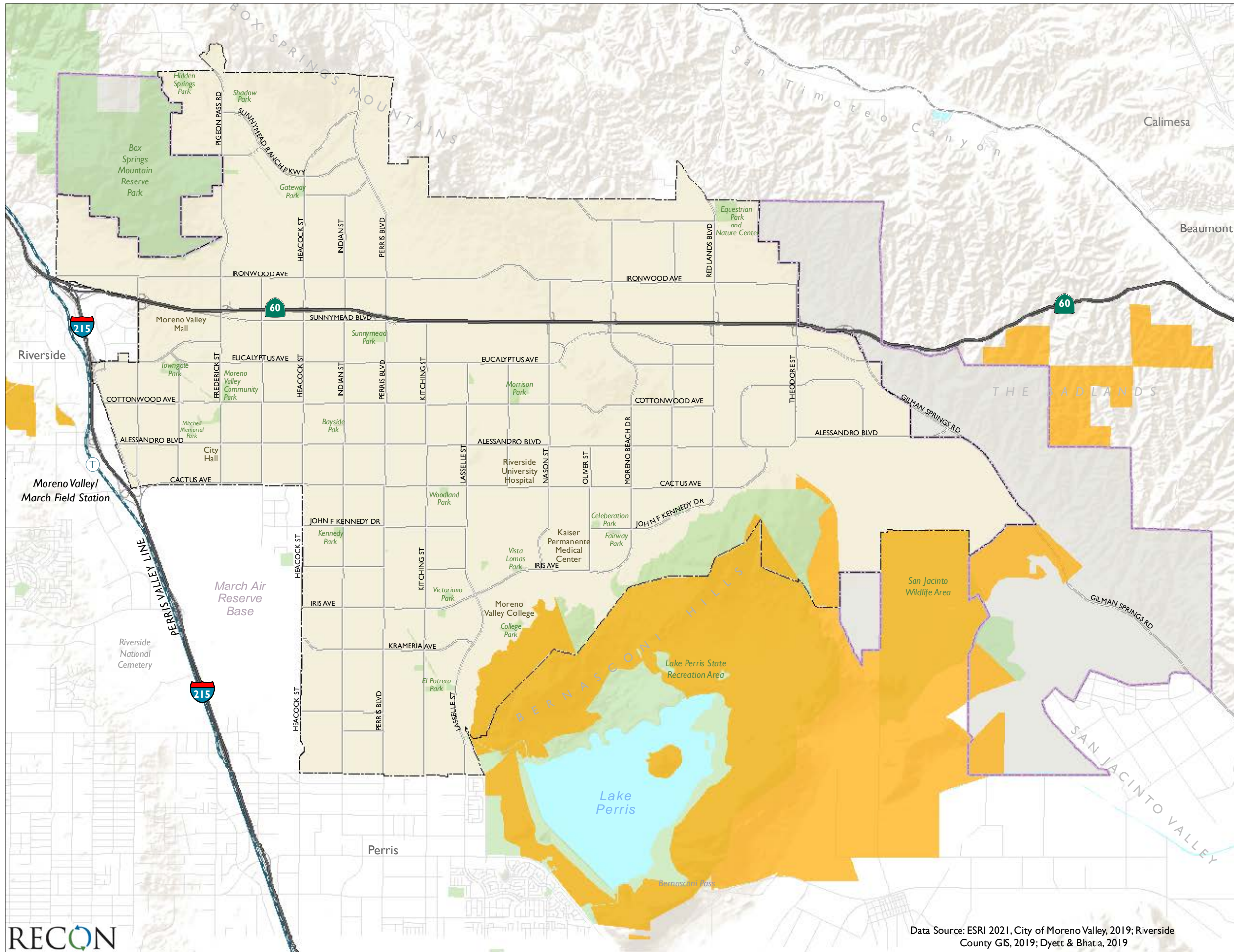
Figure 4.4-3 shows the locations of existing MSHCP Criteria Cells and Conserved Lands within the city. Criteria Cells are limited to the edges of the city boundaries including north of Sunnymead Ranch Parkway in the northwest; northerly of and east of Ironwood Avenue in the northeast; and in the area bordering San Jacinto Wildlife Area in the southeast. MSHCP Conserved Lands are located within existing Criteria Cells in the northeast and southeast portions of the city.

##### **4.4.1.3 Stephens’ Kangaroo Rat Habitat Conservation Plan and Stephen’s Kangaroo Rat Core Reserves**

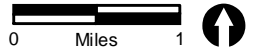
As part of the USFWS approved long-term Stephens’ kangaroo rat (Habitat Conservation Plan (HCP), a core reserve area consisting of undeveloped lands in the Lake Perris State Recreation Area and San Jacinto Wildlife Area, and previously farmed lands to the east was established for the purpose of setting aside habitat for the Stephens’ kangaroo rat. These areas include suitable and occupied habitat for this species. The 10,932-acre San Jacinto-Lake Perris core reserve is located southeast of the city and north of the Ramona Expressway and is the third largest of all the core reserves (Figure 4.4-4). A small portion of this core reserve area occurs on the south end of the Planning Area.

##### **4.4.1.4 Wildlife Movement and Corridors**

Wildlife movement corridors and habitat linkages are areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Corridors are generally local pathways connecting short distances usually covering one or two main types of vegetation communities. Linkages are landscape-level connections between very large core areas and generally span several thousand feet and cover multiple habitat types. The habitat connectivity provided by corridors and linkages is important in providing access to mates, food, and water, allowing the dispersal of individuals away from high population density areas and facilitating the exchange of genetic traits between populations (Beier and Loe 1992).



- City of Moreno Valley
- Sphere of Influence
- Stephens' Kangaroo Rat Core Reserve Area



**FIGURE 4.4-4**  
**Stephens' Kangaroo Rat**  
**Core Reserve Area**

Data Source: ESRI 2021, City of Moreno Valley, 2019; Riverside County GIS, 2019; Dyett & Bhatia, 2019



A majority of the Planning Area is already developed; however, some native habitats occur along the northern and southeastern borders as part of the Box Springs Mountains, the Badlands, and Bernasconi Hills. Wildlife movement within and between these designated core biological resource areas are currently restricted to the south, east, and north, respectively, by the existing development within the Planning Area. Within the native habitats mapped in the city, wildlife movement can occur in these localized areas, but eventually are restricted by existing development.

#### **4.4.1.5 Designated Critical Habitats**

The USFWS has designated revised critical habitat for San Bernardino kangaroo rat, San Jacinto Valley crowscale, and spreading navarretia outside, but adjacent to the Planning Area (USFWS 2008, 2013, and 2010, respectively). Critical habitats for these species occur within one mile of the city (see Figure 4.4-3). To-date, only one species, San Bernardino kangaroo rat, has been observed within the Planning Area limits. However, this observation is from 1913 and not expected to persist in this location as it has been completely developed. Both San Jacinto Valley crowscale and spreading navarretia have not been detected within the Planning Area.

#### **4.4.1.6 Conserved Lands**

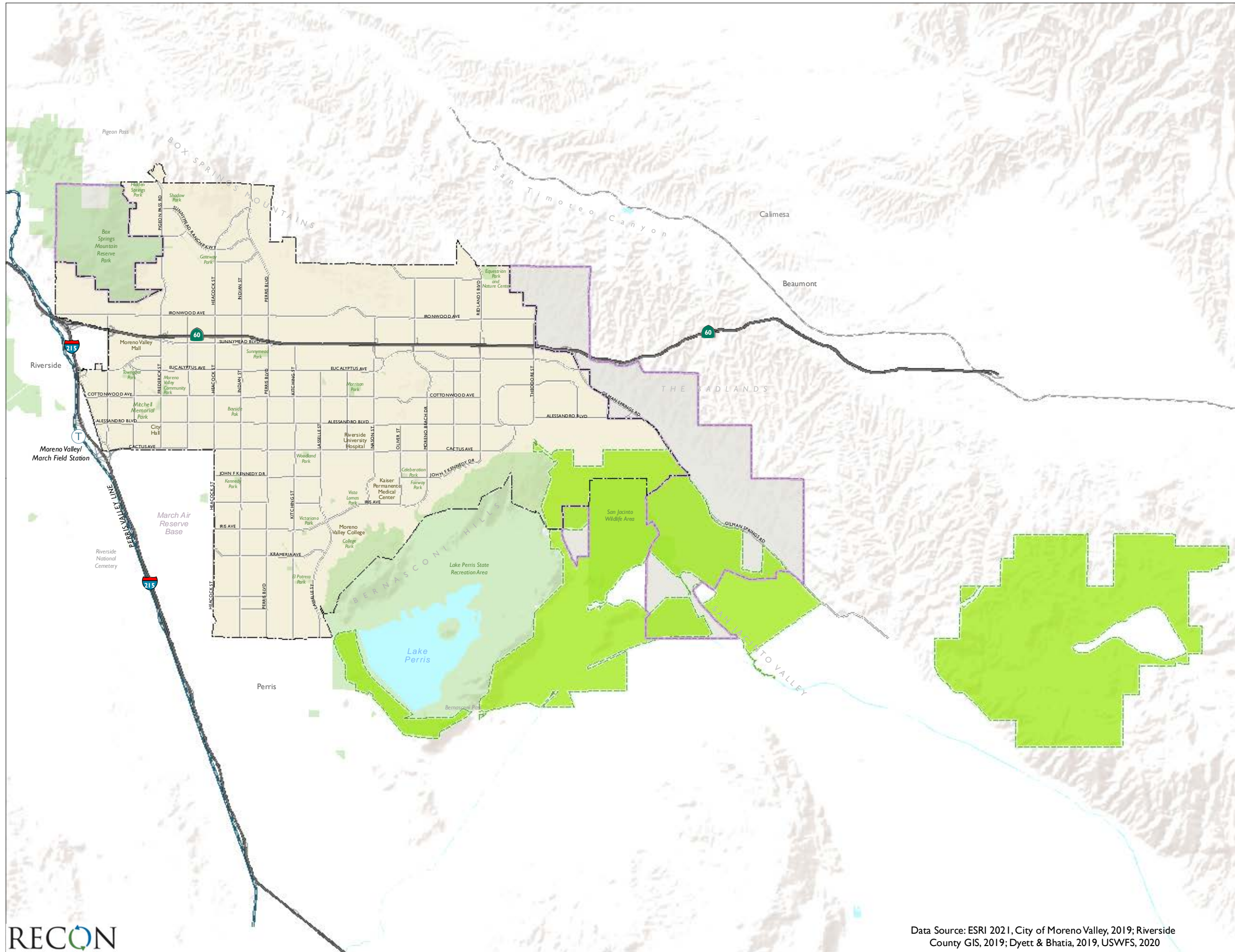
The San Jacinto Wildlife Area, located at the southeast corner of the Planning Area is a 12,000-acre wildlife preserve noted for its diversity of migratory birds (Figure 4.4-5). Other conserved lands surrounding the city include the Lake Perris Recreation Area located adjacent to the southern city limits, and the Box Springs Mountain Reserve Park located northwest of the city limits.

### **4.4.2 Applicable Regulatory Requirements**

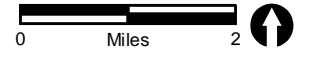
#### **4.4.2.1 Federal Regulations**

##### **a. Federal Endangered Species Act**

The United States Congress passed the Federal Endangered Species Act (FESA) in 1973 to provide a means for conserving endangered and threatened species in order to prevent species extinction, extirpation, etc. The FESA has four major components: the Section 4 provisions for listing species and designating critical habitat; the Section 7 requirement for federal agencies to consult with the USFWS to ensure that their actions are not likely to jeopardize the continued existence of species or result in the modification or destruction of critical habitat; the Section 9 prohibition against “taking” listed species; and the Section 10 provisions for permitting the incidental take of listed species. The term “take” is defined by the FESA to include the concept of “harm,” which agency regulations define to include death or injury that results from modification or destruction of a species habitat (50 Code of Federal Regulations [CFR] 17.3).



- City of Moreno Valley
- Sphere of Influence
- San Jacinto Wildlife Area



**FIGURE 4.4-5**  
San Jacinto Wildlife Area

### ***Section 7 of the FESA***

Section 7 of the FESA provides that each federal agency undertaking a federal action which could significantly affect FESA species shall consult with the Secretary of Interior or Commerce, that any actions authorized, funded, or carried out by the agency are “not likely to jeopardize the continued existence of any endangered or threatened species or result in the destruction or adverse modification of lands determined to be critical habitat” (16 United States Code [USC] Section 1536(a)(2)). The term “agency action” is broadly defined in a manner that includes nearly all actions taken by federal agencies such as permitting or carrying out a project, as well as actions by private parties which require federal agency permits or approval (50 CFR Section 402.02). The consultation requirement of Section 7 is triggered upon a determination that a proposed action “may affect” a listed species or designated Critical Habitat (50 CFR Section 402.14(a)). If the proposed action is a “major construction” activity, the federal agency proposing the action must prepare a biological assessment to include with its request for the initiation of Section 7 consultation.

Included in the USFWS Biological Opinion is an Incidental Take Statement (ITS) that authorizes a specified level of take anticipated to result from the proposed action. The ITS contains “reasonable and prudent measures” that are designed to minimize the level of incidental take, adverse modification, or destruction to critical habitat, and that must be implemented as a condition of the take authorization (50 CFR Section 402.14(i)(5)).

The issuance of a Biological Opinion concludes formal consultation, but consultation can be reinitiated if the amount or extent of incidental take authorized is exceeded, the action changes, new information reveals effects of the action not previously considered, or a new species is listed or Critical Habitat is designated (50 CFR Section 402.16). Once the Biological Opinion is issued, the project applicant must implement the terms and conditions, and conservation measures, mandated by the USFWS. Monitoring and reporting is required to be coordinated with the USFWS during the implementation of conservation measures.

### ***Section 9 of the FESA***

Section 9 of the FESA prohibits any person from “taking” an endangered animal species. Regulations promulgated by USFWS and National Oceanic and Atmospheric Administration make the “take” prohibition generally applicable to threatened animal species as well (50 CFR 17.71). Section 9 thus prohibits the clearing of habitat that results in death or injury to members of a protected species.

An authorization or permit to incidentally take listed species can be obtained either through the Section 7 consultation process or through the Section 10 incidental take permit process. In the context of Section 7, incidental take is authorized through an ITS that is issued consistent with a Biological Opinion. Measures required to conform to the ITS are contained in “reasonable and prudent measures,” as are the terms and conditions necessary to implement those measures. In the context of Section 10, incidental take is authorized through an ITP issued pursuant to Section 10(a)(1)(B). Measures contained in the ITP reflect the measures set out in a habitat conservation plan developed by the applicant in conjunction with the USFWS.

### ***Section 10 of the FESA***

Under Section 10(a)(1)(B) of the FESA, the USFWS may permit the incidental take of listed species that may occur as a result of an otherwise lawful activity. To obtain a Section 10(a)(1)(B) permit, an applicant must prepare a habitat conservation plan that meets the following five criteria: (1) the taking will be incidental to an otherwise lawful activity; (2) the applicant will, to the maximum extent practicable, minimize and mitigate the impacts of such taking; (3) the applicant will ensure that adequate funding for the plan will be provided; (4) the taking will not appreciably reduce the likelihood of the survival and recovery of the species in the wild; and (5) other measures, if any, that the USFWS requires as being necessary or appropriate for purposes of the plan will be met (16 USC Section 1539(a)(2)(A)).

#### **b. Migratory Bird Treaty Act**

The Migratory Bird Treaty Act (MBTA) (16 USC 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The number of bird species covered by the MBTA is extensive and is listed at 50 CFR 10.13. The regulatory definition of “migratory bird” is broad, and includes any mutation or hybrid of a listed species and any part, egg, or nest of such birds (50 CFR 10.12). The MBTA, which is enforced by USFWS, makes it unlawful “by any means or in any manner, to pursue, hunt, take, capture, [or] kill” any migratory bird, or attempt such actions, except as permitted by regulation. The take, possession, import, export, transport, sale, purchase, barter, or offering of these activities is prohibited, except under a valid permit or as permitted in the implementing regulations (50 CFR 21.11).

#### **c. United States Army Corps of Engineers**

The United States Army Corps of Engineers (USACE) has primary federal responsibility for administering regulations that concern waters and wetlands in the Planning Area. In this regard, the USACE acts under two statutory authorities, the Rivers and Harbors Act (33 USC, Sections 9 and 10), which governs specified activities in navigable waters, and the Clean Water Act (CWA; Section 404), which governs specified activities in waters of the U.S., including wetlands and special aquatic sites. Wetlands and non-wetland waters (e.g., rivers, streams, and natural ponds) are a subset of waters of the U.S. and receive protection under Section 404 of the CWA. The USACE has primary federal responsibility for administering regulations that concern waters and wetlands in the project area under statutory authority of the CWA (Section 404). In addition, the regulations and policies of various federal agencies mandate that the filling of wetlands be avoided to the maximum extent feasible. The USACE requires obtaining a permit if a project proposes placing structures within navigable waters and/or alteration of waters of the U.S.

## 4.4.2.2 State Regulations

### a. California Endangered Species Act

Similar to the FESA, the California Endangered Species Act (CESA) of 1970 provides protection to species considered threatened or endangered by the State of California (California Fish and Game Code, Section 2050 et seq.). The CESA recognizes the importance of threatened and endangered fish, wildlife, and plant species and their habitats, and prohibits the taking of any endangered, threatened, or rare plant and/or animal species unless specifically permitted for education or management purposes.

The CESA declares that deserving plant or animal species would be given protection by the state because they are of ecological, educational, historical, recreational, aesthetic, economic, and scientific value to the people of the state. CESA establishes that it is state policy to conserve, protect, restore, and enhance endangered species and their habitats. Under state law, plant and animal species may be formally designated as rare, threatened, or endangered through official listing by the California Fish and Game Commission. Listed species are given greater attention during the land use planning process by local governments, public agencies, and landowners than are species that have not been listed.

CESA authorizes that “[p]rivate entities may take plant or wildlife species listed as endangered or threatened under FESA and CESA, pursuant to a federal incidental take permit issued in accordance with Section 10 of the FESA, if the CDFW certifies that the incidental take statement or incidental take permit is consistent with CESA (Fish and Game Code Section 2080.1(a)).

Section 2081(b) and (c) of the CESA allows CDFW to issue an incidental take permit for a state-listed threatened and endangered species only if specific criteria are met. These criteria can be found in Title 14 California Code of Regulations (CCR), Sections 783.4(a) and (b). No Section 2081(b) permit may authorize the take of “fully protected” species and “specified birds.” If a project is planned in an area where a fully protected species or specified bird occurs, an applicant must design the project to avoid all take; the CDFW cannot provide take authorization under CESA. On private property, endangered plants may also be protected by the Native Plant Protection Act (NPPA) of 1977. Threatened plants are protected by CESA, and rare plants are protected by the NPPA; however, CESA authorizes that “Private entities may take plant species listed as endangered or threatened under the FESA and CESA through a federal ITP issued pursuant to Section 10 of the FESA, if the CDFW certifies that the ITS or ITP is consistent with CESA.” In addition, CEQA requires disclosure of any potential impacts on listed species and alternatives or mitigation that would reduce those impacts.

### b. CEQA: Treatment of Listed Plant and Animal Species

FESA and CESA protect only those species formally listed as threatened or endangered (or rare in the case of the state list). Section 15380 of the CEQA Guidelines independently defines “endangered” species of plants or animals as those whose survival and reproduction in the

wild are in immediate jeopardy and “rare” species as those who are in such low numbers that they could become endangered if their environment worsens. Therefore, a project normally would have a significant effect on the environment if it would substantially affect a rare or endangered species of animal or plant or the habitat of the species. The significance of impacts to a species under CEQA must be based on analyzing actual rarity and threat of extinction despite legal status or lack thereof.

### **c. California Fish and Game Code - Sections 1601 to 1603**

Streambeds and other drainages that occur within the Planning Area are subject to regulation by the CDFW. The CDFW considers most drainages to be “streambeds” unless it can be demonstrated otherwise. A stream is defined as a body of water that flows at least periodically or intermittently through a bed or channel with banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports, or has supported, riparian vegetation. CDFW jurisdiction typically extends to the edge of the blue-line streams, and therefore, usually encompasses a larger area than USACE jurisdiction.

### **d. California Fish and Game Code - Sections 3503 and 3503.5**

Under Section 3503 of the California Fish and Game Code, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 of the California Fish and Game Code prohibits take, possession, or destruction of any birds in the orders Falconiformes (raptors) or Strigiformes (owls) or of their nests and eggs.

### **e. Regional Water Quality Control Board**

The federal Water Pollution Control Act (also known as the Clean Water Act) (33 USC 1251 et seq.), as amended by the Water Quality Act of 1987 (PL 1000-4), is the major federal legislation governing water quality. The purpose of the CWA is to “restore and maintain the chemical, physical, and biological integrity of the nation’s waters.” Discharges into waters of the U.S are regulated under Section 404. Waters of the U.S. include (1) all navigable waters (including all waters subject to the ebb and flow of tides); (2) all interstate waters and wetlands; (3) all other waters, such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, or natural ponds; (4) all impoundments of waters mentioned above; (5) all tributaries to waters mentioned above; (6) the territorial seas; and (7) all wetlands adjacent to waters mentioned above.

### **f. California Natural Community Conservation Planning Act of 1991**

The Natural Community Conservation Planning (NCCP) Act is designed to conserve habitat-based natural communities at the ecosystem scale while accommodating compatible land uses in coordination with CESA. CDFW is the principal state agency implementing the NCCP program. The act established a process to allow for comprehensive, long-term, regional, multi-species, and habitat-based planning in a manner that satisfies the requirements of the

state and FESAs (through a companion regional habitat conservation plan). The NCCP program has provided the framework for innovative efforts by the state, local governments, and private interests, to plan for the protection of regional biodiversity and the ecosystems upon which they depend. NCCPs seek to ensure the long-term conservation of multiple species, while allowing for compatible and appropriate economic activity to proceed.

### **4.4.2.3 Local Regulations**

#### **a. Western Riverside County Multiple Species Habitat Conservation Plan**

The MSHCP is a comprehensive multi-jurisdictional habitat conservation plan focusing on the conservation of species and their associated habitats. It is one of several large multi-jurisdictional habitat-planning efforts in southern California with the overall goal of maintaining biological and ecological diversity within a rapidly urbanizing region. The MSHCP allows the County of Riverside and its cities to better control local land use decisions and maintain a strong economic climate in the region while addressing the requirements of the FESA (WRCRCA 2003). The MSHCP area encompasses 1.26 million acres (1,966 square miles), including all unincorporated Riverside County land west of the crest of the San Jacinto Mountains to the Orange County line, as well as the cities of Temecula, Murrieta, Lake Elsinore, Canyon Lake, Norco, Corona, Riverside, Moreno Valley, Banning, Beaumont, Calimesa, Perris, Hemet, Menifee, Eastvale, Jurupa Valley, and San Jacinto.

The MSHCP serves as a habitat conservation plan pursuant to Section 10(a)(1)(B) of the FESA, as amended, as well as a Natural Community Conservation Plan under the NCCP Act of 2001. The MSHCP is used to allow the participating jurisdictions to authorize “take” of plant and wildlife species identified within the plan area. The MSHCP designates Criteria Area boundaries, which contain Criteria Cells approximately 160 acres in size that have been identified as having conservation potential. The establishment of Criteria Area boundaries is intended to facilitate the process by which jurisdictions will evaluate property that may be needed for inclusion in the MSHCP Conservation Area. The Criteria Area is an analytical tool within which property will be evaluated using MSHCP Conservation Criteria to determine what properties are needed for the MSHCP Conservation Area, and does not impose land use restrictions. Public and private development within the Criteria Area that is determined to be consistent with the MSHCP Conservation Criteria is considered a Covered Activity, and land not needed for the MSHCP Conservation Area shall receive Take Authorization for Covered Species Adequately Conserved through the permits issued by jurisdictions pursuant to the MSHCP.

Figure 4.4-3 shows the locations of existing MSHCP Criteria Cells and Conserved Lands within the city. The Planning Area is partially located within Subunits 1, 2, 3, and 4 of the MSHCP, Reche Canyon/Badlands Area Plan. Criteria Cells are limited to the edges of the city boundaries including north of Sunnymead Ranch Parkway in the northwest; northerly of and east of Ironwood Avenue in the northeast; and in the area bordering San Jacinto Wildlife Area in the southeast. MSHCP Conserved Lands are located within existing Criteria Cells in the northeast and southeast portions of the city.

## **b. Stephens' Kangaroo Rat Habitat Conservation Plan**

In 1996, USFWS approved a long-term HCP for Stephens' kangaroo rat and granted an incidental take permit for Riverside County, covering an estimated 30,000 acres of occupied habitat, including land within Moreno Valley (Riverside County Habitat Conservation Agency [RCHCA] 1996) (see Figure 4.4-4). The HCP authorizes the incidental take of half of the occupied habitat remaining in the HCP area while using development fees to implement the plan, purchase private property, and create a reserve system. The Stephens' Kangaroo Rat HCP and corresponding permits are in effect for areas covered by the MSHCP; however, the Stephens' Kangaroo Rat HCP and the MSHCP remain separate. The Stephens' Kangaroo Rat Fee Area is subject to mandatory conservation measures as outlined in the Stephens' Kangaroo Rat HCP (RCHCA 1996) and as subsequently modified.

## **c. Municipal Code**

### ***Western Riverside County Multiple Species Habitat Conservation Plan Fee Program and Stephens' Kangaroo Rat Habitat Conservation Plan***

Title 3, Chapter 3.48 of the Municipal Code establishes a local development mitigation fee to further implementation of the MSHCP. These fees are intended to assist in the maintenance of biological diversity and the natural ecosystem and protect vegetation communities and natural areas within the city and western Riverside County which are known to support threatened, endangered, or key sensitive populations of plant and wildlife species. These fees also serve to provide a streamlined regulatory process from which development can proceed in an orderly process, and protect the existing character of the city and the region through the implementation of a system of reserves which will provide for permanent open space, community edges, and habitat conservation for species covered by the MSHCP.

### ***Threatened and Endangered Species***

Title 8, Chapter 8.60 of the Municipal Code contains provisions for the protection of the Stephens' Kangaroo Rat pursuant to the Stephens' Kangaroo Rat HCP, including the collection of an impact and mitigation fee to provide funds to implement the terms of the Stephens' Kangaroo Rat HCP.

### ***Heritage Trees***

Title 9, Chapter 9.17.030 , Section G of the Municipal Code provides a definition of Heritage Trees and identifies and includes policies for preservation, as well as the measures by which trees can be removed.

## **4.4.3 Methodologies for Determining Impacts**

Preparation of this section began with an extensive review of the most current biological literature and gathering of geographical information systems (GIS) data available for the Planning Area.



The sensitive flora and fauna species that are known to occur within the Planning Area are based on information obtained from the literature review. General flora and fauna species were determined based on the identified vegetation communities and the species that typically occur in these habitats. An in-house search of MSHCP, USFWS, and CNDDDB databases was also performed to identify historical occurrences of sensitive plants and wildlife species within the Planning Area. The proposed Concept Areas were then overlain on the existing biological resources GIS data to determine the approximate maximum acreage of impact to vegetation communities and proximity to known sensitive species locations within the Planning Area. This was followed by an evaluation of how the proposed GPU goals would serve to either preserve or impact biological resources within the Planning Area.

#### **4.4.4 Basis for Determining Significance**

Thresholds used to evaluate impacts to biological resources are based on applicable criteria in the CEQA Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact would occur if the project would:

- 1) 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 CDFW or USFWS;
- 2) 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 CDFW or USFWS;
- 3) 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;
- 4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- 5) Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance; or
- 6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

## 4.4.5 Impact Analysis

### 4.4.5.1 Topic 1: Sensitive Species

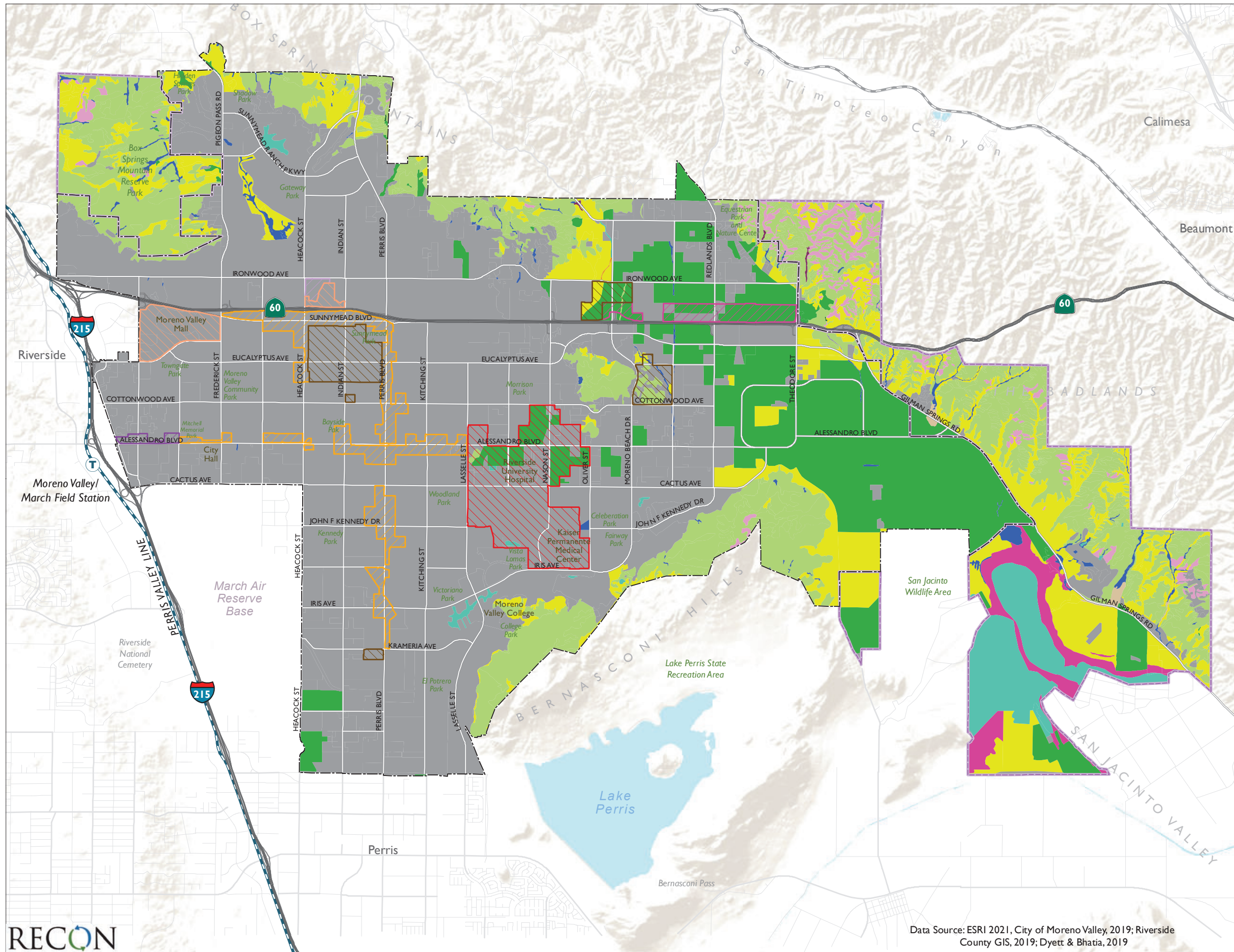
*Would the project result in a substantial adverse impact, either directly or through habitat modifications, to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the CDFW or USFWS?*

Buildout of the project would have the potential to directly or indirectly impact candidate, sensitive, or special status species. Potential direct impacts would include removal of habitat through future development and redevelopment projects that support sensitive species.

The project has been designed to minimize impacts to sensitive species by primarily focusing on future development and redevelopment within the proposed Concept Areas. These areas consist of clusters of vacant and underutilized land within the city limit that would avoid the majority of sensitive habitat that is located within the eastern and southeastern portion of the Planning Area. Focusing development and redevelopment within these areas that consist primarily of developed and/or disturbed land would minimize adverse impacts to sensitive species. Table 4.4-4 shows the maximum approximate acreage of impact that would occur through development of the Concept Areas.

Category	Planning Area
Agricultural Land	1,359.1
Coastal Sage Scrub	93.1
Riparian Scrub, Woodland, Forest	6.3
Grassland	39.3
Water	8.3
Developed/Disturbed Land	1,761.2
<b>TOTAL</b>	<b>3,267.4</b>

Figure 4.4.6 presents the locations of the proposed Concept Areas in relation to mapped vegetation communities within the Planning Area as these areas represent the areas of land use change under the GPU. As shown in Figure 4.4-6, the largest amount of existing habitat that would be impacted within the Concept Areas includes agricultural land north of SR-60, as well as vacant parcels within the proposed Downtown Center. Impacts to developed/disturbed land would not be considered significant. Additionally, impacts to coastal sage scrub, agricultural land, and grassland would not be considered significant because they are located outside of the MSHCP Conserved Lands, Criteria Cells, and Public/Quasi Public Lands. However, future development within Riparian Scrub, Woodland, and Forest within the Concept Areas would have the potential to support sensitive species, and impacts would be considered significant.



- City of Moreno Valley
- Sphere of Influence
- General Plan Concept Areas**
- Mixed Use**
  - Downtown Center
  - Center Mixed Use
  - Corridor Mixed Use
- Commercial/Office/Industrial**
  - Highway Office/Commercial
  - Business Park/Light Industrial
  - Business Flex
- Residential**
  - Residential Density Changes
- Vegetation Communities 2012**
  - Agricultural Land
  - Chaparral
  - Coastal Sage Scrub
  - Desert Scrub
  - Developed/Disturbed Land
  - Grassland
  - Meadows and Marshes
  - Playas and Vernal Pools
  - Riparian Scrub, Woodland, Forest
  - Riversidean Alluvial Fan Sage Scrub
  - Water
  - Woodland and Forests

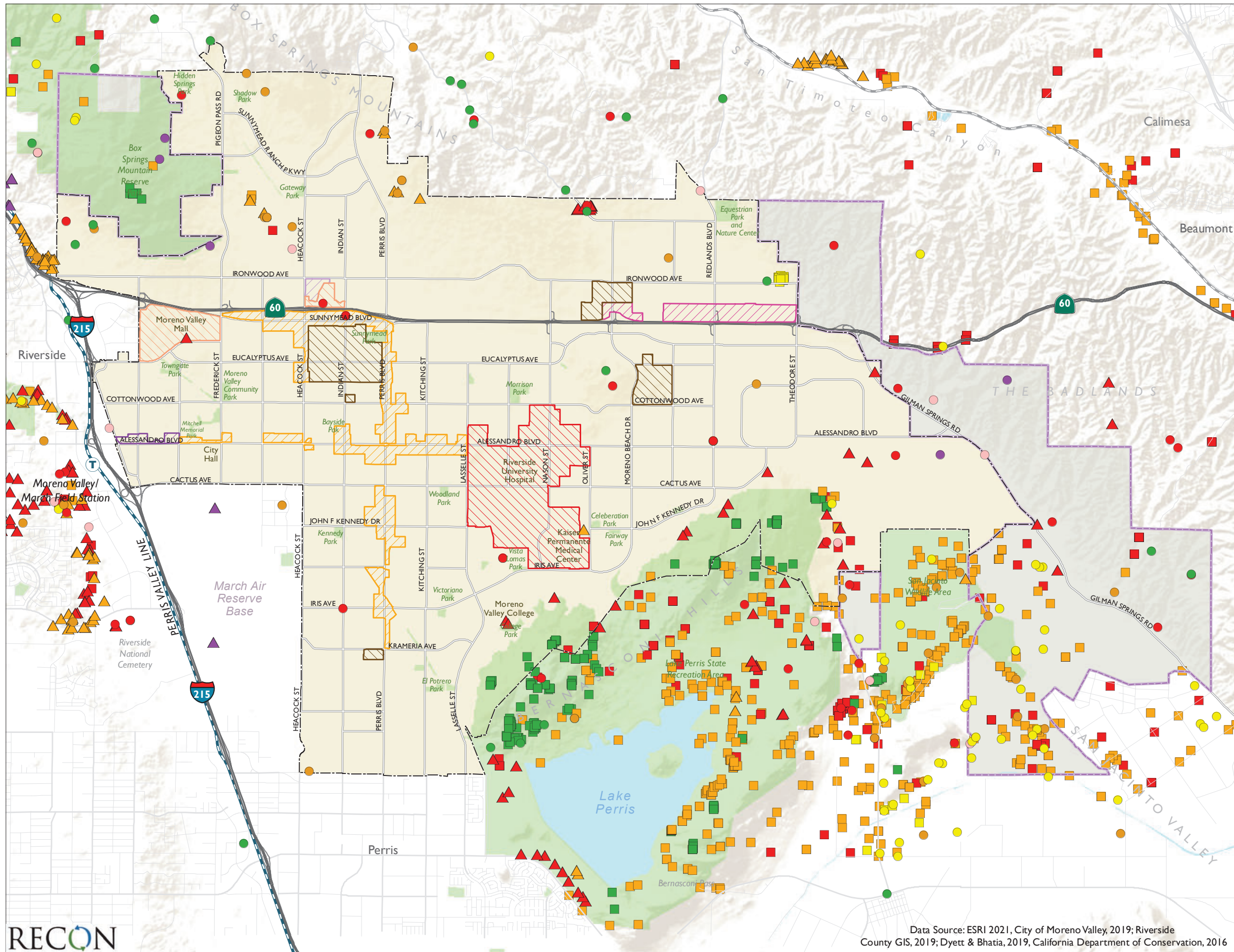


**FIGURE 4.4-6**  
Vegetation Communities Impacts

Figure 4.4-7 presents the locations of the proposed Concept Areas in relation to recorded sensitive species observations within the Planning Area. Sensitive species observations are from 2019 USFWS and CNDDDB data sources (CDFW 2021) and observation dates vary, with some being very old and likely prior to development. As shown in Figure 4.4-7, the proposed Concept Areas have few sensitive species observations, with the most observations located within surrounding conserved areas with habitat value. As the observation points shown on Figure 4.4-7 are not intended to denote a specific species location and data accuracy can vary widely, the mapping is used to inform the likelihood of sensitive species within future development areas. While the proposed areas of land use change within the Concept Areas would largely avoid known occurrences of sensitive species by focusing development within areas that consist primarily of developed and/or disturbed land, future development may occur throughout the city and on vacant parcels that may support sensitive species. At a program level of analysis it cannot be known with certainty that impacts to sensitive species could be fully avoided, which would be considered significant.

Future development and redevelopment would also occur outside of the Concept Areas that would have the potential to impact a variety of habitat types throughout the Planning Area that may support sensitive species including raptors. Development near the edges of the Planning Area or within the SOI (Badlands) could result in development within Criteria Cells, which would require consistency with the MSHCP. Additionally, indirect impacts to sensitive plant or wildlife species could also result from excess noise, lighting, or runoff generated during construction of projects both within and outside the Concept Areas. Furthermore, project construction could result in impacts to nesting or migratory birds, including raptors (as protected under the MBTA) from the removal of mature trees and/or native vegetation within project areas during the typical bird breeding season (January 15–September 15) or excessive noise.

Future projects would be required to adhere to applicable federal, state and local regulations that provide protections for sensitive species as part of the discretionary approval process for individual development projects. Applicable regulations include the Western Riverside County MSHCP, the Stephens' Kangaroo Rat Fee, and the Migratory Bird Treaty Act, as detailed in Section 4.4.2. Critical habitat for San Bernardino kangaroo rat, San Jacinto Valley crowscale, and spreading navarretia are located outside, but adjacent to the Planning Area (see Figure 4.4-3), which would ensure avoidance of significant impacts. Compliance with applicable regulations at the time of future development proposal would minimize adverse impacts to sensitive species. The following goal, policies, and action within the 2021 GPU Open Space and Resource Conservation Element (OSRC) would serve to preserve biological resources within the Planning Area.



- City of Moreno Valley
- Sphere of Influence
- General Plan Concept Areas**
- Mixed Use**
  - Downtown Center
  - Center Mixed Use
  - Corridor Mixed Use
- Commercial/Office/Industrial**
  - Highway Office/Commercial
  - Business Park/Light Industrial
  - Business Flex
- Residential**
  - Residential Density Changes
- MSHCP Species Observations\***
  - Birds
  - Reptiles
  - Mammals
  - Rare Plants
- USFWS Species Observations\***
  - Birds
  - Mammals
  - Invertebrates
- CNDDDB Species Observations\***
  - Birds
  - Reptiles
  - Amphibians
  - Invertebrates
  - Mammals
  - Plants
  - Riparian

\*Species observation locations are estimates and locations may vary from the points shown. Mapping of sensitive species observations is intended to provide an overview of the location and type of species recorded in an area.



**FIGURE 4.4-7**  
MSHCP Covered and USFWS  
Species Observations

**Goal**

- OSRC-1: Preserve, protect, and enhance natural resources, habitats, and watersheds in Moreno Valley and the surrounding area, promoting responsible management practices.

**Policies**

- OSRC.1-8 Cooperate with federal, State, and local regulatory agencies as well as non-profit organizations to promote the responsible stewardship of natural resources and habitats within the planning area.
- OSRC.1-9 Ensure that adverse impacts on sensitive biological resources, sensitive natural communities, sensitive habitat, and wetlands are avoided or mitigated to the greatest extent feasible as development takes place.
- OSRC.1-10 In areas where development (including trails or other improvements) has the potential for adverse effects on special-status species, require project proponents to submit a study conducted by a qualified professional that identifies the presence or absence of special-status species at the proposed development site. If special-status species are determined to be present, require incorporation of appropriate mitigation measures as part of the proposed development prior to final approval.
- OSRC.1-11 Require all development, including roads, proposed adjacent to riparian and other biologically sensitive habitats to provide adequate buffers to mitigate impacts to such areas.
- OSRC.1-12 Limit to extent feasible the removal of natural vegetation in hillside areas when retaining natural habitat does not pose threats to public safety.
- OSRC.1-13 Promote the use of conservation easements and preserves as means to conserve natural habitats and protect natural resources.

**Actions**

- OSRC.1-D Continue to participate in the implementation of regional habitat conservation and restoration programs, including the Western Riverside County Multiple Species Habitat Conservation Plan and the Stephens' Kangaroo Rat Habitat Conservation Plan.

These policies would maintain, protect, and preserve biologically significant habitats where practical, including the San Jacinto Wildlife Area, riparian areas, habitats of rare and endangered species, and other areas of natural significance. Adherence to these policies during the discretionary review of future development projects consistent with the GPU would serve to minimize impacts to sensitive species. Although numerous regulations including implementation of the MSHCP and GPU policies would minimize impacts to

sensitive species; at a program level of review, it cannot be ensured that all impacts could be reduced to less than significant. Impacts would be considered potentially significant.

#### **4.4.5.2 Topic 2: Sensitive Riparian Habitats**

*Would the project result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?*

As shown in Table 4.4-3 above, proposed development within the Concept Areas would have the potential to impact approximately 6.34 acres of riparian scrub, woodland, forest habitat, resulting in a significant impact. Additionally, development and redevelopment would also occur outside of the Concept Areas that would have the potential to impact a variety of riparian habitat types throughout the Planning Area. Since the biological resource mapping contained in this document is based on secondary source information rather than site-specific field surveys, potential impacts would need to be refined for individual projects.

As detailed in Section 4.4.2, state regulations regulate impacts to wetland resources, including some riparian habitats. Future site-specific discretionary review will be required for projects consistent with the GPU. This discretionary review will include site specific biological resource analysis and compliance with applicable regulations, plans and General Plan policies. Although site-specific analysis and mitigation at the project level would likely result in mitigation of impacts to sensitive riparian habitats; at a program level of review, it is not possible to ensure impacts of every future project would be fully mitigated. Therefore, impacts to sensitive riparian habitats would be significant.

#### **4.4.5.3 Topic 3: Jurisdictional Wetlands and Waters**

*Would the project result in 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?*

As shown in Table 4.4-3 above, proposed development within the Concept Areas would have the potential to impact a maximum approximately 6.3 acres of riparian scrub, woodland, forest habitat, which may qualify as wetlands or other jurisdictional resources. Additionally, development and redevelopment would also occur outside of the Concept Areas that would have the potential to impact a variety of habitat types throughout the Planning Area, including areas that may be determined to be wetlands or other jurisdictional resources through future site-specific environmental review. Since the biological resource mapping contained in this document is based on secondary source information rather than site-specific field surveys, potential impacts would need to be refined for individual projects. If warranted, a formal wetland delineation would be required in conjunction with future project applications to identify the precise boundaries of jurisdictional resources and determine the extent of any potential impacts.

As detailed in Section 4.4.2, state and federal regulations regulate impacts to wetland resources. Future site-specific discretionary review will be required for projects consistent

with the GPU. This discretionary review will include site specific biological resource analysis and compliance with applicable regulations, plans and General Plan policies. The proposed land use plan focusing development within the interior of the city combined with the regulatory framework that would apply to future development proposals is anticipated to reduce potential impacts to wetlands; however, at a program level of review, it is not possible to ensure wetland impacts of future projects would be fully mitigated. Therefore, impacts to wetland habitats would be significant.

#### **4.4.5.4 Topic 4: Wildlife Corridors**

*Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

The Planning Area is located within the MSHCP. The MSHCP identifies cores for habitat conservation and linkages for wildlife movement. The Planning Area is partially located within Subunits 1, 2, 3, and 4 of the MSHCP, Reche Canyon/Badlands Area Plan. As described in Section 4.4.1.4 above, the majority of the Planning Area is already developed. The northern edges of the city around the Box Springs Mountains, western portions of the SOI in the Badlands and areas around the San Jacinto Wildlife Preserve and Bernasconi Hills make up the key linkages identified in the Reche Canyon/Badlands Area Plan. These areas support native habitats that allow for wildlife movement within and between these designated core biological resource areas.

The proposed GPU does not propose any land use changes within these key wildlife linkages identified in the MSHCP. A comprehensive analysis of the proposed MSHCP linkages was provided in the July 2006 Moreno Valley General Plan Final EIR. As no land use changes are proposed within core linkage areas compared to the existing adopted plan, the conclusions from the 2006 Final EIR remain valid and are hereby incorporated by reference. The 2006 Final EIR found that impacts to core linkages identified in the MSHCP would be less than significant based on compliance with the MSHCP for projects within Criteria Cell areas (Moreno Valley 2006b). As future development within the Planning Area would be required to undergo a site-specific environmental review including compliance with the MSHCP, the conservation goals for wildlife corridors and linkages identified in the MSHCP would be maintained. Therefore, the project would not interfere substantially with wildlife movement within MSHCP linkages, and impacts would be less than significant.

#### **4.4.5.5 Topic 5: Local Ordinances**

*Would the project conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?*

All future development, including areas outside of the urban environment within sensitive habitat areas would be required to undergo a site-specific environmental review that would include a consistency review with local regulations, including the Heritage Tree ordinance (Title 9, Chapter 9.17.030, Section G). The discretionary review for future development



consistent with the GPU would additionally require review for consistency with General Plan policies including the GPU Open Space and Resource Conservation Element which includes goals and policy supporting preservation of biological resources. Site specific environmental review for individual development projects will ensure adherence to applicable local policies and ordinances. Therefore, impacts related to conflicts with local policies and ordinances intended to protect biological resources would be less than significant.

#### **4.4.5.6 Topic 6: Habitat Conservation Plan**

*Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

##### **a. Western Riverside County Multiple Species Habitat Conservation Plan**

As described in Section 4.4.2.3.a above, the City is a signatory to the MSHCP, which is a comprehensive multi-jurisdictional habitat conservation plan focusing on the conservation of species and their associated habitats. The MSHCP provides coverage (including take authorization for listed species) for special-status plant and wildlife species, as well as mitigation for impacts to sensitive species. The project has been designed to primarily focus future development and redevelopment within Concept Areas that would avoid MSHCP Conserved Lands, Criteria Cells, and Public/Quasi Public Lands. Focusing development and redevelopment within these areas that consist primarily of developed and/or disturbed land would minimize conflicts with the MSHCP. However, future development and redevelopment would also occur outside of the Concept Areas, which may include future projects within MSHCP Conserved Lands, Criteria Cells, and Public/Quasi Public Lands. Such future development would be required to undergo project-specific environmental and design review to determine whether the project would be consistent with the MSHCP. Additionally, the Open Space and Resource Conservation Element of the GPU includes policies that would maintain, protect, and preserve biologically significant habitats where practical, which would serve to maintain consistency with the MSHCP.

##### **b. Stephens' Kangaroo Rat Habitat Conservation Plan**

As described in Section 4.4.2.3. above, a small portion of the Stephens' Kangaroo Rat Habitat Conservation Plan's San Jacinto-Lake Perris core reserve area is located within the south portion of the Planning Area (see Figure 4.4-4). However, the GPU would maintain the existing land use designation of Park/Open Space which would serve to maintain this area for wildlife use. No conflict with the Stephens' Kangaroo Rat Habitat Conservation Plan would occur. Impacts would be less than significant.

##### **c. San Jacinto Wildlife Area**

A small portion of the San Jacinto Wildlife Area is located within the southeast corner of the Planning Area (see Figure 4.4-5). However, the GPU would maintain the existing land use

designation of Park/Open Space which would serve to maintain this area for wildlife use. No conflict with the goals for this wildlife area would occur. Impacts would be less than significant.

### **4.4.6 Cumulative Analysis**

The geographic scope for cumulative impacts related to biological resources would be the Western Riverside County MSHCP, which is a comprehensive multi-jurisdictional habitat conservation plan focusing on the conservation of species and their associated habitats. The Western Riverside County MSHCP has an overall goal of maintaining biological and ecological diversity within a rapidly urbanizing region. All future development within Western Riverside County would undergo project specific environmental review that would evaluate potential impacts to biological resources and determine whether the project would be consistent with the Western Riverside County MSHCP. The proposed land use changes associated with the GPU are consistent with the conservation goals for the MSHCP as development is focused within the existing urban areas of the city, maintaining existing conservation or low-density land use designations within areas bordering or within MSHCP Criteria Cells. Future site-specific environmental review and applicable regulatory requirements including but not limited to the MSHCP, GPU policies, and state and federal wetland regulations would ensure cumulative impacts would be less than significant.

### **4.4.7 Significance of Impacts before Mitigation**

#### **4.4.7.1 Topic 1: Sensitive Species**

Buildout of the GPU would have the potential to directly or indirectly impact candidate, sensitive, or special status species. Potential direct impacts would include removal of habitat through future development and redevelopment projects that support sensitive species. Future site-specific environmental review for development consistent with the GPU would ensure appropriate biological surveys are completed and would require adherence to applicable regulations and policies such as the MSHCP and policies in the Open Space and Resource Conservation Element of the GPU. While these regulations are likely to ensure adverse impacts to sensitive species are reduced at the project level, at a program level of analysis it is not possible to ensure that every impact could be fully mitigated. Therefore, the project would have the potential to result in a substantial adverse effect on candidate, sensitive, or special status species, and impacts would be significant.

#### **4.4.7.2 Topic 2: Sensitive Riparian Habitats**

Buildout of the GPU has the potential to impact a variety of riparian habitat types throughout the Planning Area. Future site-specific environmental review for development consistent with the GPU would ensure appropriate biological surveys are completed and would require adherence to applicable regulations and policies such as the MSHCP, state and federal wetland regulations, and policies in the Open Space and Resource Conservation Element of the GPU. While these regulations are likely to ensure adverse impacts to sensitive riparian habitats are reduced at the project level, at a program level of analysis it is not

possible to ensure that every impact could be fully mitigated. Therefore, the project would have the potential to result in a substantial adverse effect on sensitive riparian habitats, and impacts would be significant.

#### **4.4.7.3 Topic 3: Jurisdictional Wetlands and Waters**

Buildout of the GPU has the potential to adversely affect jurisdictional wetlands and waters. While subsequent development and redevelopment projects would be required to evaluate potential impacts on wetlands through project-level CEQA documentation and would be required to obtain applicable state and federal wetland permits, at a program level of analysis it is not possible to ensure that every impact would be fully mitigated. Therefore, the project would have the potential to result in a substantial adverse effect on wetlands, and impacts would be significant.

#### **4.4.7.4 Topic 4: Wildlife Corridors**

The GPU land use changes are focused within the center of the city and existing land uses within and adjacent to key linkage areas in the MSHCP are maintained, ensuring the overall conservation goals and linkages needed to maintain wildlife movement would be maintained. As future development within the Planning Area would be required to undergo a site-specific environmental review including compliance with the MSHCP, the conservation goals for wildlife corridors and linkages identified in the MSHCP would be maintained. The GPU would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, and impacts would be less than significant.

#### **4.4.7.5 Topic 5: Local Ordinances**

Future projects would be required to comply with GPU policies that support protection of biologically significant habitats where practical, including the San Jacinto Wildlife Area, riparian areas, habitats of rare and endangered species, and other areas of natural significance. During future site-specific discretionary reviews, individual projects will be required to demonstrate consistency with applicable local ordinances protecting biological resources. Therefore, the project would not conflict with any local policies or ordinances protecting biological resources, and impacts would be less than significant.

#### **4.4.7.6 Topic 6: Habitat Conservation Plan**

The project has been designed to primarily focus on future development and redevelopment within Concept Areas and along Community Corridors that would avoid MSHCP Conserved Lands, Criteria Cells, and Public/Quasi Public Lands. While no land use changes are proposed within MSHCP Conserved Lands, Criteria Cells, Public/Quasi Public Lands, or Stephens' Kangaroo Rat Habitat Conservation Plan areas, the existing plan allows for limited development within these areas. However, any development within MSHCP Criteria Cells or other conserved status lands would require a discretionary review including a site-specific biological analysis including demonstrating compliance with MSHCP conservation goals.

Project-specific environmental review and required compliance with the MSHCP and other applicable plans would ensure consistency with applicable habitat conservation plans. Impacts would be less than significant.

## 4.4.8 Mitigation

Mitigation measure BIO-1 would require a site-specific biology survey for sites with the potential for sensitive biological resources to be present. This survey would occur at the time future projects are proposed, based on site-specific conditions at the time of application. The measures provide a framework for future development consistent with the General Plan to reduce potentially significant impacts to the extent feasible.

### 4.4.8.1 Topic 1: Sensitive Species

**BIO-1:** Applications for future development of vacant properties (and portions thereof), wherein the Director of Community Development or his or her designee has determined a potential for impacts to sensitive biological resources, shall be required to prepare a site-specific general biological resources survey to identify the presence of any sensitive biological resources, including any sensitive plant or wildlife species. The report shall identify the need for focused presence/absence surveys and identify the presence of state or federal regulated wetlands or waters. If potentially significant impacts to sensitive biological resources, including sensitive species and/or wetlands are identified, the report shall also recommend appropriate mitigation to reduce the impacts to below a level of significance.

**BIO-2:** Applications for future development, wherein the Director of Community Development or his or her designee has determined a potential for impacts to mature trees and/or native vegetation suitable for nesting birds, shall be required to restrict removal of sensitive habitat and vegetation to outside the breeding seasons of any sensitive species identified within adjacent properties (typical bird breeding season is February 1–September 1, as early as January 1 for some raptors). If vegetation clearing must begin during the breeding season, a qualified biologist shall provide recommendations to avoid impacts to nesting birds which typically includes a pre-construction survey within 3 days of the start of construction to determine the presence of active nests.

If active nests are found, avoidance measures shall be implemented to ensure protection of the nesting birds. Avoidance measures may include a no-activity buffer zone, typically 300 feet from the area of disturbance or 500 feet for raptors, established at the discretion of the qualified biologist in consultation with the City. If activity buffer zones are not feasible, temporary noise barriers may be installed to attenuate construction noise. Noise wall height and adequacy shall be supported by a noise analysis to determine the anticipated construction noise levels with attenuation measures as recommended by the biologist and approved by the City. Periodic noise monitoring shall be

conducted during construction to ensure noise attenuation standards are met. Accepted noise levels are species dependent and existing ambient noise levels can play a factor in establishing baseline acceptable noise.

#### **4.4.8.2 Topic 2: Sensitive Riparian Habitats**

Refer to mitigation measure BIO-1.

#### **4.4.8.3 Topic 3: Jurisdictional Wetlands and Waters**

Refer to mitigation measure BIO-1.

#### **4.4.8.4 Topic 4: Wildlife Corridors**

Impacts would be less than significant. No mitigation is required.

#### **4.4.8.5 Topic 5: Local Ordinances**

Impacts would be less than significant. No mitigation is required.

#### **4.4.8.6 Topic 6: Habitat Conservation Plan**

Impacts would be less than significant. No mitigation is required.

### **4.4.9 Significance of Impacts after Mitigation**

#### **4.4.9.1 Topic 1: Sensitive Species**

Implementation of mitigation measures BIO-1 and BIO-2 would reduce impacts on sensitive and special status species. However, no specific projects have been identified at this time, and it is not possible to ensure that every future project could fully mitigate potentially significant impacts despite the applicable regulatory framework. Therefore, impacts to candidate, sensitive, or special status species would remain significant and unavoidable at this program level of review.

#### **4.4.9.2 Topic 2: Sensitive Riparian Habitats**

Implementation of the mitigation measures described above would reduce impacts on riparian habitats. However, no specific projects have been identified at this time, and it is not possible to ensure that every future project could fully mitigate potentially significant impacts despite the applicable regulatory framework. Therefore, impacts to riparian habitats would remain significant and unavoidable at this program level of review.

### **4.4.9.3 Topic 3: Jurisdictional Wetlands and Waters**

Implementation of the mitigation measures described above would reduce impacts on wetlands. However, no specific projects have been identified at this time, and it is not possible to ensure that every future project could fully mitigate potentially significant impacts to wetlands despite the applicable regulatory framework. Therefore, impacts to jurisdictional wetlands and waters would remain significant and unavoidable at this program level of review.

### **4.4.9.4 Topic 4: Wildlife Corridors**

Impacts would be less than significant. No mitigation is required.

### **4.4.9.5 Topic 5: Local Ordinances**

Impacts would be less than significant. No mitigation is required.

### **4.4.9.6 Topic 6: Habitat Conservation Plan**

Impacts would be less than significant. No mitigation is required.

## 4.5 Cultural and Tribal Cultural Resources

This section analyzes potentially significant impacts related to cultural and tribal cultural resources that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the entire city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area. This analysis relies on secondary source information and the review of existing cultural resources databases and literature.

### 4.5.1 Existing Conditions

Cultural resources are generally categorized into three subtopics: archaeological, historic, and tribal cultural resources. Archaeological resources (generally located below ground surface) are divided into two categories: prehistoric and historic age. Prehistoric archaeological resources date from before the onset of the Spanish Colonial period (1769 to 1848) and historic archaeological resources date from and after the onset of the Spanish Colonial period. An historic resource (generally located above ground) is any building, structure, or object that is at least 50 years of age and that is, or may be, significant architecturally or culturally in local, state, or national history. Tribal cultural resources are generally similar to the federally defined Traditional Cultural Properties (TCPs), but incorporate consideration of local and state significance and required mitigation under the California Environmental Quality Act (CEQA). A TCP may be considered eligible for listing based on “its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community” (Parker and King 1998:1). Strictly speaking, TCPs are both tangible and intangible; they are anchored in space by cultural values related to community-based physically defined “property referents” (Parker and King 1998:3). On the other hand, TCPs are largely ideological, a characteristic that may present substantial problems in the process of delineating specific boundaries. Such a property’s extent is based on community conceptions of how the surrounding physical landscape interacts with existing cultural values. By its nature, a TCP need only be important to community members and not the general outside population as a whole.

#### 4.5.1.1 Cultural Setting

The following culture chronology for Riverside County is based on a synthesis of the existing literature. This chronology is intended as a general model, which is dynamic and subject to modification as new information is uncovered. The prehistory of western Riverside County has been included as part of the coastal San Diego subregion (Moratto 1984). Consequently, much is made of work completed in San Diego County, to the south of the Planning Area.

### **a. Early Holocene (10,000–7,000 B.P.)**

The early occupants of the Riverside area are archaeologically represented by a culture pattern known as the Western Pluvial Lakes Tradition (WPLT) (Bedwell 1970). The WPLT includes the Playa, San Dieguito, Lake Mojave, and Death Valley I complexes. It is defined by:

- Site locations being on or near former pluvial lakeshores or along old streams;
- A focus on hunting mammals and collecting and gathering plant materials;
- A toolkit including chipped-stone crescents, large flake and core scrapers, choppers, scraper-planes, hammerstones, several types of cores, drills and graters, and a variety of flakes; a developed flaked-stone technology with percussion-flaked foliate knives and points, Silver Lake and Lake Mojave points; and
- A lack of ground stone artifacts.

The WPLT people were adapted to a wetter environment before the warmer climate led to the evaporation of the lakes (Moratto 1984).

### **b. Middle Holocene (7,000–1,500 B.P.)**

The Millingstone Horizon occurs during this time period in western Riverside County. The Millingstone Horizon includes the La Jolla, Pauma, and Sayles complexes (Moratto 1984). The La Jolla Complex was defined from coastal San Diego sites (Rogers 1938, 1945). An apparent inland manifestation of the La Jolla Complex was termed the “Pauma Complex” by D. L. True (1958), who proposed the name to describe assemblages recovered from more than 20 inland sites in northern San Diego County. The La Jolla and Pauma complexes have very similar assemblages and are thought to be different environmental adaptations of the same culture (True 1958). Archaeological investigations in the Cajon Pass were used to define the type site (SBR-421) for the Sayles Complex (Kowta 1969). Kowta (1969) defined the Sayles Complex as a variant of the Millingstone Horizon from the vicinity of the Cajon Pass.

The Millingstone Horizon assemblages suggest a generalized subsistence focus with an emphasis on hard seeds. This emphasis is indicated by the increased frequency of slab and basin metates and the adoption of a mixed cobble/core-based tool assemblage composed primarily of crudely made choppers, scrapers, and cobble hammerstones. The assemblage is typically dominated by crude, cobble-based choppers, scrapers, and flake knives. Scraper-planes are also abundant, which Kowta (1969) suggests were used to process agave and yucca. Projectile points are relatively rare, but late in the period, Elko type points are occasionally seen. Portable basin and slab metates are relatively plentiful, suggesting an economic focus on gathering plant resources. Mortars and pestles appear in the Millingstone Horizon, suggesting the use of acorns. The presence of shell middens distinguishes the La Jolla Complex from the other Millingstone Horizon complexes.



### c. Late Holocene (1,500 B.P.–1769)

Shoshonean-speaking people from the Colorado River region moved westward into Riverside County (Moratto 1984) during the Late Holocene. Cultures representative of this time are the San Luis Rey Complex in northern San Diego County and western Riverside County and the Irvine Complex in Orange County (Meighan 1954; Moratto 1984; True et al. 1974). First described by Meighan (1954) and based on excavations at Pala, the San Luis Rey Complex is divided into an early phase, San Luis Rey I, and a later phase, San Luis Rey II. San Luis Rey I sites are associated with bedrock outcrops and often have recognizable midden soils. Features may include cremations and bedrock mortars. The artifact assemblage includes metates, Cottonwood Triangular type projectile points, drills, bifacially flaked knives, bone awls, occasional steatite arrow shaft straighteners, and bone and shell ornaments (True and Waugh 1981). San Luis Rey II sites consist of the same assemblage with the addition of Tizon Brown Ware ceramics, red and black pictographs, cremation remains in urns, and historic materials such as glass beads and metal objects. The projectile points commonly found in San Luis Rey assemblages, Cottonwood Triangular and, less frequently, Desert side-notched forms, are both smaller than earlier types, suggesting the introduction of bow-and-arrow technology into the region.

#### 4.5.1.2 Ethnography

The Planning Area includes an area where the traditional territories of the Cahuilla, Luiseño, and the Gabrieliño intersect, according to Kroeber (1970) and Bean and Smith (1978).

The Cahuilla are one of the most southwesterly of the Shoshonean or Uto-Aztecan speakers. They are members of the Takic branch of this large language family. Traditional Cahuilla territory originally included western and part of central Riverside County and extended into northeastern San Diego and northwestern Imperial counties. The western boundary generally followed the Santa Ana, Elsinore, and Palomar mountains. The northern boundary extended north of Riverside to the San Gabriel and San Bernardino mountains. Cahuilla territory extended east to include the Coachella Valley and down the valley as far south as the approximate middle of the Salton Sea. The approximate southern territorial limits included Borrego Springs and the south end of the Santa Rosa Mountains. The Cahuilla territory consisted of the mountain, the pass or western, and the desert divisions (Bean 1978; Hooper 1920:316; Strong 1929).

According to Kroeber (1925), Cahuilla society consisted of two ceremonial divisions or moieties: wildcat and coyote. People were further divided into somewhat localized, patrilineal clans. Each clan had a chief: *net* in Cahuilla (Kroeber 1925:691). Some villages contained people of only one clan, but other villages had more than one clan. Also, people of one clan may have lived in more than one village. Chiefs were usually chosen by heredity. They were primarily concerned with economic issues such as determining where and when people should gather particular foods or hunt game, and for the correct maintenance of the ritual aspect of the clan. Choice hunting and gathering areas were owned by the clan. The clan chief also settled intraclan disputes and met with other *nets* to solve interclan problems and organize ceremonies among clans.

The Luiseño were Shoshonean or Uto-Aztecan-speaking populations that were found in northern San Diego, southern Orange, and southeastern Riverside counties from the onset of ethnohistoric times through the present day. These people are linguistically and culturally related to the Gabrieliño and Cahuilla and appear to be the direct descendants of Late Prehistoric populations. The basic unit of Luiseño social structure was the clan triblet. The triblet was composed of patrilineally related people who were politically and economically autonomous from neighboring triblets. Unlike other Takic-speaking tribes that surround them, the Luiseño do not appear to have been organized into exogamous moieties (descent groups that married outside one's birth group), but may have been loosely divided into mountain-oriented groups and ocean-oriented groups (Bean and Shipek 1978). One or more clans would reside together in a village (Oxendine 1983). A heredity village chief held a position that controlled economic, religious, and warfare powers (Bean and Shipek 1978).

The Gabrieliño were Cupan speakers. The Cupan languages are part of the Takic family, which is part of the Uto-Aztecan linguistic stock. Their tribal territory included the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers, all of the Los Angeles Basin, the coast from Aliso Creek in the south to Topanga Creek in the north, and the islands of San Clemente, San Nicholas, and Santa Catalina. Villages or triblets were politically autonomous and made up of different lineages. Each lineage had its own leader and would seasonally leave the village to collect resource items. The Gabrieliño traded with the Serrano to the east. They traded their coastal shell through middlemen to the interior of southern California and the Southwest. Steatite from Santa Catalina Island was their main trade item.

### **4.5.1.3 Historic Period**

The Spanish Period in California (1769–1821) represents a time of European exploration and settlement. Military and religious contingents established the San Diego Presidio and the San Diego Mission in 1769, San Carlos Borromeo (Carmel) in 1770, and San Gabriel Arcangel in 1771. Mission San Gabriel Arcangel claimed the areas around Riverside, Jurupa, San Jacinto, and the San Geronio Pass. The opening of the mission system created the need to link Alta California with Sonora. Juan Bautista de Anza of Tubac was commissioned to open up a road across the Colorado Desert to San Gabriel and on to Monterey. The first de Anza Expedition took place between 1774 and 1775. Anza stopped in the vicinity of present-day Riverside at an Indian Village along the Santa Ana River southwest of Mount Rubidoux (Hoover et al. 2002).

Most scholars suggest that the Spanish mission system usually, but not always, used forced Native American labor to produce goods and provide services needed for European settlement (Forbes 1982; Hurtado 1988; McWilliams 1973; Castillo 1978; Rawls and Bean 1998). The mission system also introduced horses, cattle, sheep, and agricultural goods and implements, and provided new construction methods and architectural styles. As stated above, the vicinity of Riverside was part of the San Gabriel Mission (Lech 2004). Many Native American lands were taken over by the Spanish for cattle grazing. Also with the arrival of the Spanish came devastating epidemics and very high death rates (Cook 1976).

The Mexican Period (1821–1848) retained many of the Spanish institutions and laws. Cattle ranching still dominated the economy and the development of the hide and tallow trade with New England merchant ships increased during the early part of the Mexican Period. The Spanish mission system was secularized by the Mexican government, and these lands allowed for the dramatic expansion of the rancho system. Although a total of 16 land grants were established in what became Riverside County, none included the city of Moreno Valley. The Spanish mission system was secularized by the Mexican government, and the redistribution of these lands allowed for the dramatic expansion of the rancho system. The city is located between Jurupa (Rubidoux) and Rancho San Jacinto Nuevo y Potrero. Following the 1848 Treaty of Guadalupe Hidalgo, Rancho San Jacinto Nuevo y Potrero was filed with the Public Land Commission in 1852, and the grant was patented to T. W. Sutherland, guardian of the minor children of Miguel Pedorena in 1883 (Willey 1886:55).

In the 1830s and 1840s, an increasing number of Americans were settling in California and the Southwest, and in 1836 Texas declared its independence from Mexico. In February 1846, Texas was annexed by the United States, triggering the Mexican–American War (Texas State Historical Association 2001). Americans in northern California revolted and declared an independent California Republic, which ceased to exist three weeks later, when U.S. naval forces took Monterey on July 7, 1846. The California part of the war ended in Los Angeles on January 13, 1848, and the Treaty of Guadalupe Hidalgo was signed on February 2, 1848. California became a state in 1850.

The Moreno Valley area began to develop in the late 1880s with the establishment of the Alessandro and Moreno settlements. The community of Moreno was built around the intersection of Redlands Boulevard and Alessandro Boulevard and named in honor of Frank Brown (Moreno in Spanish), a civil engineer, who had visions of a successful agricultural community like he had established in Redlands to the north of the Valley (Redlands Daily Facts 2008). The community of Alessandro was located within the limits of present-day March Air Reserve Base (MARB). In 1893 Brown formed the Bear Valley Land and Water Company and built a dam at Bear Valley in the San Bernardino Mountains to provide water to the communities of Redlands at first and ultimately the communities of Moreno and Alessandro. The increased demands for water from Bear Valley resulted in litigation with the City of Redlands which claimed priority rights. In 1891, the Perris & Alessandro Irrigation District was formed by order of the San Bernardino County Board of Supervisors to solve the litigation between Redlands and the Moreno Valley region over water use from the Bear Valley Dam. Redlands won the litigation in 1899. The majority of the Valley was abandoned that year after the loss of water rights and due to a drought (Moreno Valley 2020a).

The Alessandro Aviation Field was established in 1918 and then renamed to March Field. March Field closed in 1922 after World War I (WWI), and re-opened in 1927 as a flight training school (military museum 2021). The name was changed March Air Force Base in 1948 (military museum 2020). The unincorporated community of Sunnymead was established in 1922 and was followed by the unincorporated community of Edgemont in 1940. The development of March Air Force Base post-WWII aided in the continued growth of Edgemont and Sunnymead. The Eastern Municipal Water District began to supply water to the Valley in 1954. The dam at Lake Perris was completed in 1970. In 1984, the communities

of Edgemont, Sunnymead, and Moreno came together to form the city of Moreno Valley and the first general plan was adopted in 1986 to guide future growth and development (Moreno Valley 2020).

#### **4.5.1.4 Existing Historic and Prehistoric Resources**

In March 2020, RECON requested a records search for the Planning Area from the California Historical Resources Information System, at the Eastern Information Center (EIC), located at the University of California Riverside. To identify the presence of cultural resources, the cultural records search inventoried the following:

- The National Register of Historic Places (NRHP)
- California Register of Historical Resources (CRHR)
- California Historical Landmarks, California Points of Historical Interest
- California State Historic Resources Inventory through the Office of Historic Preservation Historic Property Data File for Riverside County.

RECON also reviewed the cultural resources information from the 2006 Moreno Valley General Plan Program EIR.

##### **a. Historic Resources**

Review of the records search from EIC and recent aerial photographs identified 48 existing historic resources. The types of historic resources identified in the records search include adobe buildings, canals/aqueducts, cisterns, wells, foundations, walls, farms/ranches, highway, military property, single-family property, and multi-family property. The majority of the historic resources have not been evaluated for significance under CEQA. Significance criteria and eligibility definitions are provided in Section 4.5.2 below. A description of each of these resources is provided in Table 4.5-1, and the locations of each of these resources is presented in Figure 4.5-1. Of the 48 historic resources that were identified within the Planning Area, the following were determined to be significant:

- Old Moreno School (P-33-007278) – listed as a California Point of Historical Interest.
- Two single-family properties (P-33-007287 and P-33-007288) – recommended eligible at the local level.
- Three single-family properties (P-33-007284, P-33-007286, and P-33-007289) and one multi-family property (P-33-007285) – recommended eligible for the NRHP.
- First Congregational Church – Listed as significant in the existing 2006 General Plan.

**Table 4.5-1  
List of Historic Resources and their Eligibility Status\***

	Primary Number	Trinomial Number	Resource Type	Eligibility	Recording Events	Notes
1	P-33-001705	CA-RIV-001705	Adobe, block structures	Likely not significant	1979 (C.E. Drover, n/a)	Existing
2	P-33-003248	CA-RIV-003248/H	Cistern	Likely not significant	1987 (Karen K. Swope, Archaeological Research Unit, UC Riverside [UCR], CA.)	Site is still vacant
3	P-33-003249	CA-RIV-003249/H	Cistern	Likely not significant	1987 (Karen K. Swope, Archaeologist Research Unit, UCR, CA.)	Site is still vacant
4	P-33-006229		Road; Highway	Not evaluated	1983 (Jim Warner, Riverside County Historical Commission [RCHC])	See 33-021095 Jack Rabbit Trail road
5	P-33-006915		Single-family property	Not evaluated	1983 (Jim Warner, RCHC)	Older home existing on-site; 21730 Bay Avenue
6	P-33-006916		Single-family property	Not evaluated	1983 (Jim Warner, RCHC)	Older home existing on-site; 21874 Bay Avenue
7	P-33-006917		Single-family property	Not evaluated	1983 (Jim Warner, RCHC)	Older home existing on-site; 21613 Cottonwood Avenue
8	P-33-006918		Single-family property	Not evaluated; listed as eligible under Criterion 3 as a good example of Moorish architecture under GP 2006	1983 (Jim Warner, RCHC) circa 1938	Older home existing on-site (built in 1938): 21768 Cottonwood Avenue
9	P-33-006919		Single-family property	Not evaluated	1983 (Jim Warner, RCHC)	Older home existing on-site; 13694 Edgemont Street
10	P-33-007275		Single-family property	Not evaluated	1983 (Jim Warner, RCHC) (County of Riverside)	Older home existing on-site; 12130 Theodore Street
11	P-33-007278		Single-family property; Educational building: Moreno School	Listed as point of historical interest; Under Criterion 3 (oldest local structure; excellent example of Mission Revival architecture)	1983 (Jim Warner, RCHC); 1988 (Gerald A. Maloney, Department of Parks); 1988 (Cynthia Howse, n/a)	Structure remains on-site; 28780 Alessandro Blvd.
12	P-33-007284		Single-family property	Recommended eligible NR, under Criterion C as a good example of rural architecture	1983 (Jim Warner, RCHC)	Home existing on-site; 24638 Fir Avenue
13	P-33-007285		Multiple family property	Recommended eligible NR, under Criterion C for its unusual use of a hipped gable and unique use of a single hipped gablet	1983 (Jim Warner, RCHC)	Home existing on-site; 23741 Hemlock Avenue
14	P-33-007286		Single-family property	Recommended eligible NR, under Criterion C as a good example of early housing in the Sunnymead area	1983 (Jim Warner, RCHC)	Home existing on-site; 11808 Indian Street
15	P-33-007287		Single-family property	Recommended eligible locally; under Criterion 2 as being associated with a Japanese potato farmer who built a major irrigation system	1983 (Jim Warner, RCHC)	Home existing on-site; 11811 Indian Street

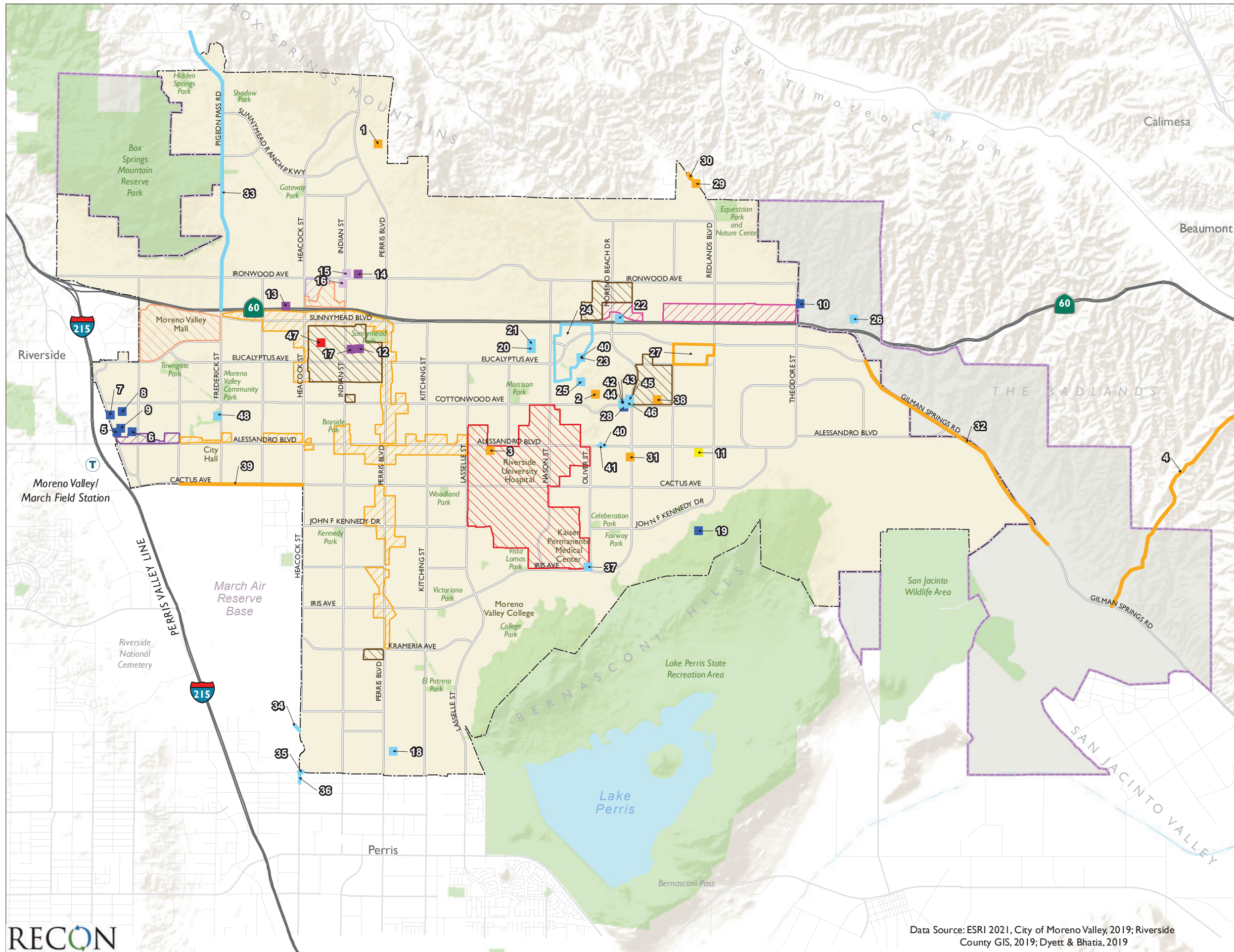
**Table 4.5-1  
List of Historic Resources and their Eligibility Status\***

	Primary Number	Trinomial Number	Resource Type	Eligibility	Recording Events	Notes
16	P-33-007288		Single-family property	Recommended eligible locally, under Criterion 3 for its design by Air Force architect Colonel Rufus Pilshire	1983 (Jim Warner, RCHC)	Home existing on-site; 11919 Indian Street, moved from 1795 University Avenue, Riverside
17	P-33-007289		Single-family property	Recommended eligible NR, under Criterion C for its board and batten siding in the Sunnymead area	1983 (Jim Warner, RCHC)	Home existing on-site; 12680 Indian Street
18	P-33-011604		Well	Not significant	2001 (Riordan Goodwin, LSA Associates, Inc.)	Cannot verify on aerial
19	P-33-013109		Spring house, house foundations	Not evaluated	1983 (R. Mason, Scientific Resource Surveys, Inc.)	Vacant site; possibly near south end of Province Circle
20	P-33-014210		Single-family property	Not significant	2005 (White, Laura S., Archaeological Associates)	Existing home built in the 1980s
21	P-33-014211		Single-family property	Not significant	2005 (White, Laura S., Archaeological Associates)	Existing home built in the 1980s
22	P-33-014952	CA-RIV-007951	Water conveyance system	Not significant	2006 (Cary D. Cotterman, ECORP Consulting, Inc.)	Existing (blue line stream on-site)
23	P-33-015025/ P-33-15029	CA-RIV-007989/ 07993	Dam and Reservoir	Not significant	2004 (Goodwin, R., LSA Associates, Inc.); 2005 (Brunzell, David, LSA Associates, Inc.)	Existing
24	P-33-015027	CA-RIV-007991	Water conveyance system	Not significant	2004 (Goodwin, Riordan, LSA Associates, Inc.)	Existing
25	P-33-015030	CA-RIV-007994	Water conveyance system	Not significant	2004 (Brunzell, D., LSA Associates)	Existing
26	P-33-015649		Isolate - trough	Not significant	2006 (J. Sanka, Michael Brandman Associates)	Existing
27	P-33-015796		Foundations	Likely not significant	2006 (Jeanette A. McKenna, McKenna et al.)	Existing
28	P-33-015934		Single-family property; Trees; Farm/ranch	Not evaluated	2006 (Daly, Pamela, PCR Services, Inc.)	Existing; 27913 Cottonwood Avenue
29	P-33-019871	CA-RIV-010116	Water conveyance system	Likely not significant	2011 (William R. Gillelan, Atkins)	Existing
30	P-33-019915	CA-RIV-010123	Water conveyance system; Reservoir	Likely not significant	2009 (C. Cotterman, ECORP Consulting)	Existing
31	P-33-019919		Well; Water conveyance system	Likely not significant	2010 (C. Cotterman, ECORP Consulting)	Existing
32	P-33-021095/ P-33-021096		Highway, gravel pits, culvert	Likely not significant	2012 (Josh Smallwood, Applied Earthworks, Inc.)	See P-33-11621 (Table 4.5-2), P-33-006229
33	P-33-024847	CA-RIV-007865	Highway	Not significant	2016 (Jeanette A. McKenna, McKenna et al.)	Existing; Pigeon Pass Road north of SR-60
34	P-33-024854		Canal/Engineering structure	Not significant	2016 (Josh Smallwood, Applied EarthWorks, Inc.)	Existing
35	P-33-024867		Canal/ aqueduct	Not significant	2016 (Josh Smallwood, Applied EarthWorks, Inc.)	Existing
36	P-33-024868		Highway	Not significant	2016 (Josh Smallwood, Applied EarthWorks, Inc.)	Existing; southern end of Heacock Street
37	P-33-027260		Isolate - metal pipe	Not significant	2017 (Riordan Goodwin, LSA Associates Inc)	Existing
38	P-33-028081	CA-RIV-012678	Walls/ fences	Likely not significant	2017 (H. Murphy, K. Stankowski, R. Bolger, M. Jorgensen & D. Faith, Tierra Environmental Services, Inc.)	

**Table 4.5-1  
List of Historic Resources and their Eligibility Status\***

	Primary Number	Trinomial Number	Resource Type	Eligibility	Recording Events	Notes
39	P-33-028200	CA-RIV-012721	Canal/ aqueduct	Likely not significant	2018 (Salvadore Z. Boites, CRM Tech)	Existing
40	P-33-028580		Road	Not significant	2017 (Kristina Lindgren, ECORP Consulting, Inc.)	Existing; Alessandro Blvd.
41	P-33-028581		Road	Not significant	2017 (Kristina Lindgren, ECORP Consulting, Inc.)	Existing; Oliver St.
42	P-33-028827		Foundations	Not significant	2017 (Kyle Garcia, ESA)	Existing
43	P-33-028828		Foundations	Not significant	2017 (Kyle Garcia, ESA)	Existing
44	P-33-028829		Foundations	Not significant	2017 (Kyle Garcia, ESA)	Existing
45	P-33-028830		Foundations; Other	Not significant	2017 (Kyle Garcia, ESA)	Physically overlaps or intersects 33-004286
46	P-33-028831		Foundations	Not significant	2017 (Kyle Garcia, ESA)	Existing
47	n/a		First Congregational Church of Moreno	Significant, under Criterion 3 as an example of the oldest surviving structures in Moreno	n/a	Moved to current location at 24215 Fir Avenue
48	n/a		Cottonwood Golf Center	Not significant	n/a	13671 Frederick Street

\*The EIC identified 94 historic resources. However, review of recent aerial photographs determined that only 48 of these historic resources currently exist.



- City of Moreno Valley
- Sphere of Influence
- General Plan Concept Areas**
- Mixed Use**
  - Downtown Center
  - Center Mixed Use
  - Corridor Mixed Use
- Commercial/Office/Industrial**
  - Highway Office/Commercial
  - Business Park/Light Industrial
  - Business Flex
- Residential**
  - Residential Density Changes
- Historic Resources**
  - Significant
  - Listed as Point of Historical Interest
  - Recommended Eligible National Register (NR)
  - Recommended Eligible Locally
  - Likely Not significant
  - Not Significant
  - Not Evaluated



FIGURE 4.5-1

Historic Resources

Data Source: ESRI 2021, City of Moreno Valley, 2019; Riverside County GIS, 2019; Dyett & Bhatia, 2019



## **b. Archaeological Resources**

The records search from EIC identified 255 archaeological resources. This included 227 prehistoric sites, such as bedrock milling features, cairns, rock shelters, hearths, lithic scatters, ground stone scatters, ceramic scatters, and rock art. The records search also identified five historic archaeological sites, including trash scatters, two historic grave sites, nine foundations with trash scatters, and twelve multi-component resources (Table 4.5-2). The multi-component archaeological resources (both prehistoric and historic) include bedrock milling features and cisterns, foundations, trash scatters, walls, adobe remnants, or ranch features. The majority of the archaeological resources have not been evaluated for significance under CEQA. Nine archaeological resources have been recommended eligible for the NRHP/CRHR and 40 resources have been recommended not eligible for the NRHP/CRHR. Four resources have been destroyed by construction. The remaining 202 resources have not been evaluated and should be considered potentially significant.

Prehistoric resources tend to be located within the foothills. Based on the results of the record search, ten complexes based on topographically distinct regions within the Planning Area were identified that have the potential to possess archaeological resources. These complexes include Box Springs Mountains, Pigeon Pass Valley, Reche Hills, Moreno Hills, Wolfskill Ranch North, Wolfskill Ranch West, North Badlands, Eden Hot Springs/South Badlands, Moreno School, and Laselle & Brodiaea (Figure 4.5-2). Each of these complexes encompasses at least one habitation site, numerous bedrock milling features, and lithic scatters. Some complexes also include rock art in the form of pictographs and petroglyphs. The prehistoric complex areas have a higher likelihood for additional resources to be found; however, prehistoric resources can exist in other topographic areas that have not been surveyed.

## **4.5.2 Applicable Regulatory Requirements**

### **4.5.2.1 Federal**

#### **a. National Historic Preservation Act of 1966**

The National Historic Preservation Act of 1966 established the NRHP as the official federal list of cultural resources that have been nominated by state offices for their historical significance at the local, state, or national level. The NRHP, which is administered by the National Park Service, is “an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment.” Listing in the National Register assists in preservation of historic properties through the following actions: recognition that a property is of significance to the nation, the state, or the community; consideration in planning for federal or federally assisted projects; eligibility for federal tax benefits; consideration in the decision to issue a federal permit; and, qualification for federal assistance for historic preservation grants, when funds are available.

**Table 4.5-2  
List of Archaeological Resources and their Eligibility**

Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-000012	CA-RIV-000012	Rock art, rock shelter, bedrock milling	Prehistoric	Not evaluated	1941 (C. Smith, University of California); 1963 (P. Chace & E. Shepard, San Bernardino County Museum); 1983 (J. Desautels, Scientific Resource Surveys, Inc.); 1987 (Daniel McCarthy, Cultural Resource Facility: California State University, Bakersfield); 1988 (Beth Padon/Pat Jertberg, LSA Associates, Inc.); 1995 (Daniel F. McCarthy, Cultural Resource Facility: California State University, Bakersfield); 2049 (C. Smith, University of California, California Archeological Survey)
P-33-000021	CA-RIV-000021	Rock art, bedrock milling	Prehistoric	Not evaluated	1929 (Strong, University of California); 1965 (BB, MK, University of California); 1981 (Arda Haenszel, n/a); 1983 (R. McDonald, Scientific Resource Surveys, Inc.); 1987 (Daniel McCarthy, Archeological Research Unit, U C Riverside); 1989 (K. Owens, R. Olsen, S. Dies, n/a); 1995 (Daniel McCarthy, Cultural Resource Faculty, California State University, Bakersfield)
P-33-000110	CA-RIV-000110	Bedrock milling, ground stone	Prehistoric	Not evaluated	1951 (Eberhart, n/a); 1984 (S. Bouscaren etc., UCR ARU)
P-33-000202	CA-RIV-000202	Rock art, bedrock milling, lithic, ceramic, ground stone	Prehistoric	Not evaluated	1941 (C. Smith, UCR ARU); 1949 (C. Smith, UCR ARU); 1957 (J. Smith, UCR ARU); 1975 (Hall, UCR ARU); 1983 (Robyn MacDonald, Scientific Resource Surveys, Inc.); 1983 (Robyn MacDonald, Scientific Resource Surveys, Inc.); 1983 (Robyn MacDonald, Scientific Resource Surveys, Inc.); 1983 (Robyn MacDonald, Scientific Resource Surveys, Inc.); 1983 (Robyn MacDonald, Scientific Resource Surveys, Inc.); 1988 (D. McCarthy, UCR Archeological Research Unit); 1989 (M. Romano, S. Dies, K. Owens, E. Crabtree, R. Olsen, Applied Earthworks); 1989 (M. Romano, Applied Earthworks)
P-33-000331	CA-RIV-000331	Rock art, rock shelter, bedrock milling	Prehistoric	Not evaluated	1966 (MK, UCR); 1987 (Daniel F. McCarthy, ARU UCR); 1989 (S. Dies, K. Owens, R. Olson, n/a); 2000 (James Workman, Lake Perris State Recreational Area)
P-33-000361	CA-RIV-000361	Rock art, bedrock milling, lithic, ground stone	Prehistoric	Not evaluated	1959 (EW Shepard, Pacific Coast Archaeological Society, Inc.); 1970 (Turney & Mercer O'Leary, n/a); 1981 (L.L. Bowles, UCR ARU); 1987 (D. F. McCarthy, Archeological Research Unit, U C Riverside); 2004 (Pat Thomson, n/a); 2010 (Britt W. Wilson, n/a)
P-33-000419	CA-RIV-000419	Rock art, bedrock milling	Prehistoric	Not evaluated	1963 (P. Chace & E. Shepard, San Bernardino County Museum); 1963 (P. Chace & E. Shepard, San Bernardino County Museum); 1968 (M. O'Neil, UCR ARU); 1983 (Jackie Desautels, Scientific Resource Surveys); 1988 (Daniel McCarthy, Archeological Research Unit, U C Riverside); 1995 (Daniel McCarthy, Cultural Resource Facility, California State University)

**Table 4.5-2  
List of Archaeological Resources and their Eligibility**

Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-000420	CA-RIV-000420	Bedrock milling, lithics, ground stone, trash scatter	Prehistoric, Historic	Not evaluated	1968 (M. O'Neil, UCR ARU); 1983 (Jackie Desautels, Scientific Resource Surveys, Inc.)
P-33-000421	CA-RIV-000421	Rock art, bedrock milling	Prehistoric	Not evaluated	1963 (Paul Chace & E. Shepard, San Bernardino County Museum); 1968 (M. O'Neil, UCR ARU); 1983 (Jackie Desautels, Scientific Resource Surveys, Inc.); 1988 (Daniel F. McCarthy, Archaeological Research Unit, U C Riverside.); 1995 (Daniel F. McCarthy, Cultural resource Facility, California State University)
P-33-000464	CA-RIV-000464	Rock art, bedrock milling	Prehistoric	Not evaluated	1953 (P. Chace & E. Shepard, UCR ARU); 1983 (Robyn MacDonald, Scientific Resources Survey, Inc.); 1983 (J. Desautels, D. Corey, Scientific Resource Survey, Inc.); 1983 (D. Desautels, Scientific Resources Survey, Inc.); 1983 (Roger Mason, Scientific Resource Surveys, Inc.); 1984 (A. Cody, Scientific Resources Survey, Inc.); 1989 (M. Romano, R. Olson and K. Owens, Metropolitan Water District); 2000 (James Workman, UCR ARU)
P-33-000497	CA-RIV-000497	Bedrock milling, ceramic, adobe, trash scatter	Prehistoric, Historic	Not evaluated	1971 (T. O'Brian, UCR); 1976 (H. Wells, T. Snyder, UCR); 1987 (Daniel F. McCarthy, UCR ARU)
P-33-000530	CA-RIV-000530	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, UCR ARU); 1983 (Jackie Desautels, Scientific Resources Surveys, Inc.); 1988 (Beth Padon/Pat Jertberg, LSA Associates, Inc.)
P-33-000531	CA-RIV-000531	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, UCR-ARU); 1983 (J. Desautels, Scientific Resource Surveys, Inc.); 1988 (Beth Padon/ Pat Jertberg, LSA Associates)
P-33-000532	CA-RIV-000532	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, UCR-ARU)
P-33-000533	CA-RIV-000533	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, UCR-ARU); 1983 (Don Carey, Scientific Resource Surveys, Inc.)
P-33-000534	CA-RIV-000534	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, ARU-UCR); 1983 (Don Carey, Scientific Resource Surveys, Inc.)
P-33-000535	CA-RIV-000535	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, UCR-ARU); 1983 (Don Carey, Scientific Resource Surveys, Inc.)
P-33-000536	CA-RIV-000536	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, UCR-ARU); 1983 (Don Carey, Scientific Resource Surveys)
P-33-000537	CA-RIV-000537	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, UCR-ARU); 1983 (Don Carey, Scientific Resource Surveys)
P-33-000538	CA-RIV-000538	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, UCR-ARU); 1983 (Don Carey, Scientific Resource Surveys)
P-33-000539	CA-RIV-000539	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, UCR-ARU)
P-33-000540	CA-RIV-000540	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, n/a); 1983 (Don Carey, Scientific Resource Surveys)

**Table 4.5-2  
List of Archaeological Resources and their Eligibility**

Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-000541	CA-RIV-000541	Bedrock milling	Prehistoric	Likely not significant	1963 (P. Chace & E. Shepard, San Bernardino County Museum); 1972 (Terry Ambrose, UCR-ARU); 1983 (Don Carey, Scientific Resource Surveys)
P-33-000542	CA-RIV-000542	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, UCR-ARU); 1983 (Don Carey, Scientific Resource Surveys.)
P-33-000543	CA-RIV-000543	Bedrock milling	Prehistoric	Likely not significant	1972 (Terry Ambrose, UCR-ARU); 1983 (Don Carey, Scientific Resource Surveys)
P-33-000608	CA-RIV-000608	Bedrock milling	Prehistoric	Likely not significant	1973 (P. Wilke, San Bernardino County Museum); 1983 (Robyn MacDonald, Scientific Resource Surveys, Inc.); 2010 (Ecorp Consulting, Inc., Ecorp Consulting, Inc.)
P-33-000609	CA-RIV-000609	Rock alignment, bedrock milling	Prehistoric	Not evaluated	1973 (P. Wilke, San Bernardino County Museum); 1983 (R. MacDonald, Scientific Resource Surveys, Inc.)
P-33-000610	CA-RIV-000610	Bedrock milling	Prehistoric	Likely not significant	1973 (P. Wilke, San Bernardino County Museum); 1983 (R. MacDonald, Scientific Resource Surveys, Inc.); 2006 (Michael Dice, Michael Brandman Associates)
P-33-000683	CA-RIV-000683	Bedrock milling	Prehistoric	Likely not significant	1982 (Lerch, M. K., San Bernardino County Museum); 2008 (McDougall, D.; J. George; and Gothar, B., Applied EarthWorks, Inc.)
P-33-000715	CA-RIV-000715	Bedrock milling	Prehistoric	Likely not significant	1963 (P. Chace & E. Shepard, San Bernardino County Museum); 1983 (Jackie Desautels, Scientific Resource Surveys, Inc.); 1988 (Beth Padon/ Pat Jertberg, LSA Associates, Inc.)
P-33-000857	CA-RIV-000857	Bedrock milling, lithics	Prehistoric	Likely not significant	1975 (R. Weaver, UCR ARU); 1987 (C. Prior, M. Conroy, B. Neiditch, ARU, UCR); 2013 (Daniel Ballester and Daniel Perez, CRM TECH)
P-33-000860	CA-RIV-000860	Bedrock milling	Prehistoric	Not significant	1976 (D. Lipp & R. Weaver, UCR ARU); 1987 (Barry R. Neiditch, Archaeological Research Unit, U C Riverside); 2006 (Archaeological Staff, Michael Brandman Associates)
P-33-001019	CA-RIV-001019	Lithic, ground stone	Prehistoric	Not evaluated	1963 (A.M. Haemsllel, San Bernardino County Museum); 1980 (Jean A. Saepasl, UCR ARU)
P-33-001020	CA-RIV-001020	Bedrock milling, ground stone	Prehistoric	Not evaluated	1963 (G. Smith, San Bernardino County Museum)
P-33-001063	CA-RIV-001063	Bedrock milling	Prehistoric	Likely not significant	1976 (Eastvold, UCR ARU); 1987 (P. Parr, K. Swope, Archaeological Research Unit, U C Riverside)
P-33-001064	CA-RIV-001064	Bedrock milling	Prehistoric	Not evaluated	1976 (Eastvold, UCR ARU); 1987 (R. E. Parr, B. Arkush, Archaeological Research Center, U C Riverside); 2008 (Jeanette A. McKenna, McKenna et al.)
P-33-001080	CA-RIV-001080	Lithic, ground stone	Prehistoric	Not evaluated	1976 (D. Bell, UCR ARU); 1981 (L.L. Bowles, UCR ARU)
P-33-001703	CA-RIV-001703	Bedrock milling, adobe	Prehistoric, Historic	Not evaluated	1979 (C.E. Drover, n/a)
P-33-001704	CA-RIV-001704	Adobe, trash scatter, ground stone	Prehistoric, Historic	Likely not significant	1979 (C.E. Drover, n/a)
P-33-001976	CA-RIV-001976	Lithic scatter, ground stone	Prehistoric	Likely not significant	1980 (Jean A. Salpas, UCR ARU)

**Table 4.5-2  
List of Archaeological Resources and their Eligibility**

Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-001977	CA-RIV-001977	Bedrock milling feature	Prehistoric	Likely not significant	1980 (Jean A. Salpas, UCR ARU)
P-33-002025	CA-RIV-002025	Foundation; Trash scatter; Hearths; Ancillary building; Farm; Adobe building	Historic	Significant	1980 (C. Colquehoun, Archaeological Associates, Costa Mesa, CA); 1991 (Laurie S. White, Archaeological Associates, Sun City, CA); 2003 (David M. Smith and Ron Norton, The Kieth Companies, Inc., Irvine, CA); 2007 (Toenjes, Julianne, Sarah Mattiussi and Rachael Nixon, Stantec, Palm Desert, CA)
P-33-002185	CA-RIV-002185	Bedrock milling feature	Prehistoric	Likely not significant	1981 (C.E. Drover and E. Drover, UCR ARU)
P-33-002236	CA-RIV-002236	Lithic scatter, ground stone	Prehistoric	Likely not significant	1981 (L.L. Bowles, UCR ARU); 2006 (Kristie R. Blevins, L&L Archaeologist)
P-33-002531	CA-RIV-002531	Bedrock milling feature	Prehistoric	Likely not significant	1982 (D. Jenkins, n/a)
P-33-002587	CA-RIV-002587	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Van Horn and Murray, Archaeological Associates, Costa Mesa, CA)
P-33-002588	CA-RIV-002588	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Murray and Van Horn, Archaeological Associates, Costa Mesa, CA)
P-33-002589	CA-RIV-002589	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Murray and Van Horn, Archaeological Associates, Costa Mesa, CA)
P-33-002590	CA-RIV-002590	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Van Horn and Murray, Archaeological Associates, Costa Mesa, CA)
P-33-002734	CA-RIV-002734	Bedrock milling feature	Prehistoric	Likely not significant	1983 (C. Rector and D. Pinto, UCR ARU)
P-33-002752	CA-RIV-002752	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Jean A. Salpas, UCR ARU)
P-33-002763	CA-RIV-002763	Bedrock milling feature	Prehistoric	Likely not significant	1984 (K.J. Peter and D. Desautels, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002775	CA-RIV-002775	Bedrock milling feature	Prehistoric	Likely not significant	1984 (Jean A. Salpas, UCR ARU); 1990 (Brook S. Arkbush, Archaeological Research Unit, UC Riverside, Riverside, CA)
P-33-002776	CA-RIV-002776	Bedrock milling feature	Prehistoric	Likely not significant	1984 (Jean A. Salpas, UCR ARU); 1990 (Brooke S. Arkbush, Archaeological Research Unit, UC Riverside, Riverside, CA)
P-33-002777	CA-RIV-002777	Bedrock milling feature	Prehistoric	Likely not significant	1984 (Jean A. Salpas, UCR ARU); 1990 (Brooke S. Arkbush, Archaeological Research Unit, UC Riverside, Riverside, CA)
P-33-002817	CA-RIV-002817	Lithic scatter, ground stone	Prehistoric	Not evaluated	1984 (S. Bouscaren etc., UCR ARU)
P-33-002818	CA-RIV-002818	Lithic scatter, ground stone	Prehistoric	Not evaluated	1984 (S. Bousacaren etc., UCR ARU)
P-33-002819	CA-RIV-002819	Lithic scatter, ground stone	Prehistoric	Not evaluated	1984 (S. Bouscaren, UCR ARU)
P-33-002829	CA-RIV-002829	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Ann Cody, Scientific Resource Surveys, Huntington Beach, CA)
P-33-002863	CA-RIV-002863	Bedrock milling feature	Prehistoric	Likely not significant	1984 (C.E. Drover, UCR ARU); 2017 (H. Murphy, K. Stankowski, R. Bolger, M. Jorgensen, D. Faith, Tierra Environmental Services, Inc.)

**Table 4.5-2  
List of Archaeological Resources and their Eligibility**

Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-002864	CA-RIV-002864	Bedrock milling feature	Prehistoric	Likely not significant	1984 (C.E. Drover, UCR); 2017 (H. Murphy, K. Stankowski, B. Bolger M. Jorgensen, D. Faith, Tierra Environmental Services)
P-33-002865	CA-RIV-002865	Bedrock milling feature	Prehistoric	Likely not significant	1984 (C.E. Drover, n/a); 2017 (H. Murphy, K. Stankowski, M. Jorgensen, D. Faith, Tierra Environmental Services, Inc.)
P-33-002866	CA-RIV-002866	Bedrock milling feature	Prehistoric	Likely not significant	1984 (C.E. Drover, UCR)
P-33-002867	CA-RIV-002867	Bedrock milling feature; Rock shelter	Prehistoric	Likely not significant	1983 (Thomas Banks, Scientific Resource Surveys, Huntington Beach, CA); 1989 (K. Owens, R. Olson and S. Dies, n/a)
P-33-002868	CA-RIV-002868	Bedrock milling feature	Prehistoric	Likely not significant	1984 (C.E. Drover, ARU)
P-33-002869	CA-RIV-002869	Bedrock milling feature	Prehistoric	Likely not significant	1984 (C.E. Drover, UCR ARU)
P-33-002894	CA-RIV-002894	Bedrock milling feature	Prehistoric	Likely not significant	1984 (C.E. Drover, UCR)
P-33-002895	CA-RIV-002895	Lithic scatter; Bedrock milling feature; Rock feature; Rock shelter	Prehistoric	Not evaluated	1984 (C.E. Drover, UCR); 2006 (Cary D. Cotterman, ECORP Consulting Inc., Redlands, CA)
P-33-002896	CA-RIV-002896	Bedrock milling feature	Prehistoric	Likely not significant	1984 (C.E. Drover, UCR); 2006 (ECORP Consulting, Inc., ECORP Consulting, Inc.)
P-33-002897	CA-RIV-002897	Bedrock milling feature	Prehistoric	Destroyed	1984 (C.E. Drover, UCR); 2006 (ECORP Consulting, Inc., ECORP Consulting, Inc.)
P-33-002950	CA-RIV-002950	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA); 1989 (S.A. Williams and E. Crabtree, n/a)
P-33-002951	CA-RIV-002951	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA); 2010 (Ecorp Consulting, Inc., Ecorp Consulting, Inc.)
P-33-002952	CA-RIV-002952	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002953	CA-RIV-002953	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002954	CA-RIV-002954	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002955	CA-RIV-002955	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002956	CA-RIV-002956	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002957	CA-RIV-002957	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA); 1989 (S. Dies, R. Olson and K. Owens, n/a)
P-33-002958	CA-RIV-002958	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA); 1989 (K. Owens, S. Dies and R. Olson, n/a)
P-33-002959	CA-RIV-002959	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002960	CA-RIV-002960	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA)

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List of Archaeological Resources and their Eligibility**

Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-002961	CA-RIV-002961	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002962	CA-RIV-002962	Bedrock milling feature	Prehistoric	Likely not significant	1984 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002963	CA-RIV-002963	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002964	CA-RIV-002964	Bedrock milling feature	Prehistoric	Likely not significant	1984 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002965	CA-RIV-002965	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA); 1989 (K. Owens, R. Olson and S. Dies, n/a)
P-33-002967	CA-RIV-002967	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002968	CA-RIV-002968	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas J. Banks, Scientific Resource Surveys, Inc., Huntington Beach, CA); 1989 (K. Owens, S. Dies and R. Olson, n/a)
P-33-002969	CA-RIV-002969	Rock feature	Prehistoric	Not evaluated	1983 (Vicki Mason, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-002993	CA-RIV-002993	Bedrock milling feature	Prehistoric	Likely not significant	1983 (Thomas Banks, Scientific Resource Survey, Huntington Beach, CA)
P-33-002994	CA-RIV-002994	Bedrock milling feature	Prehistoric	Likely not significant	1984 (Roger Mason, Scientific Resource Surveys, Huntington Beach, CA)
P-33-002995	CA-RIV-002995	Bedrock milling feature; Rock shelter	Prehistoric	Not evaluated	1983 (Roger Mason, Scientific Resource Surveys, Huntington Beach, CA)
P-33-003057	CA-RIV-003057	Bedrock milling feature	Prehistoric	Likely not significant	1986 (Philip de Barros, UCLA/Golden West Col, Stanton, CA)
P-33-003067	CA-RIV-003067	Bedrock milling feature	Prehistoric	Likely not significant; destroyed?	1985 (M.L. Hemphill, Scientific Resource Surveys, Inc., Huntington Beach, CA); 1990 (C.E. Drover and D.M. Smith, Christopher Drover, Santa Ana, CA); 2004 (P. Fulton and N. Lawson, LSA Associates, Inc., Riverside, CA); 2006 (V. Austerman, n/a)
P-33-003088	CA-RIV-003088	Bedrock milling feature	Prehistoric	Likely not significant	1986 (C.E. Drover, UCR)
P-33-003089	CA-RIV-003089	Bedrock milling feature	Prehistoric	Likely not significant	1986 (C.E. Drover, n/a)
P-33-003133	CA-RIV-003133	Bedrock milling feature	Prehistoric	Likely not significant	1986 (Daniel F. McCarthy, Archaeological Research Unit, UC Riverside, CA)
P-33-003134	CA-RIV-003134	Bedrock milling feature	Prehistoric	Likely not significant	1986 (Daniel F. McCarthy, Archaeological Research Unit, UC Riverside, CA)
P-33-003135	CA-RIV-003135	Bedrock milling feature	Prehistoric	Likely not significant	1986 (Daniel F. McCarthy, Archaeological Research Unit, UC Riverside, CA)
P-33-003159	CA-RIV-003159	Bedrock milling feature	Prehistoric	Likely not significant	1987 (C. Prior, M. Conroy and B. Neiditch, Archaeological Research Unit, UC Riverside, CA); 2013 (Daniel Ballester and Daniel Perez, CRM TECH); 2015 (Daniel Ballester, CRM TECH)
P-33-003223	CA-RIV-003223	Bedrock milling feature	Prehistoric	Not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA); 1990 (Letter: Kathryn Gualtieri, Office of Historic Preservation, Sacramento, CA);

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List of Archaeological Resources and their Eligibility**

Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
					2001 (Kay White Email to: Joseph McDole, EIC); 2001 (Fax: Joseph McDole, Office of Historic Preservation, Sacramento, CA)
P-33-003224	CA-RIV-003224	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003225	CA-RIV-003225	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003226	CA-RIV-003226	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003227	CA-RIV-003227	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003228	CA-RIV-003228	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA); 1993 (Juanita R. Shinn and Joan Brown, RMW Paleo Associates, Mission Viejo, CA)
P-33-003229	CA-RIV-003229	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003230	CA-RIV-003230	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003231	CA-RIV-003231	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003232	CA-RIV-003232	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003233	CA-RIV-003233	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003234	CA-RIV-003234	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003235	CA-RIV-003235	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003236	CA-RIV-003236	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003237	CA-RIV-003237	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003238	CA-RIV-003238	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA); 2006 (M. Dice, Michael Brandman Associates, Irvine, CA)
P-33-003239	CA-RIV-003239	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003240	CA-RIV-003240	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003241	CA-RIV-003241	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003242	CA-RIV-003242	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003243	CA-RIV-003243	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003244	CA-RIV-003244	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeology Research Unit, UC Riverside, CA)



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List of Archaeological Resources and their Eligibility**

Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-003245	CA-RIV-003245/H	Bedrock milling feature; Foundations; Walls	Prehistoric, Historic	Not evaluated	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA); 1991 (J. Keller, Jean A. Keller, Consulting Archaeologist, Temecula, CA); 2002 (Daniel Ballester, CRM TECH)
P-33-003246	CA-RIV-003246	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto, Archaeological Research Unit, UC Riverside, CA)
P-33-003247	CA-RIV-003247/H	Trash scatter; Adobe structure	Historic	Not evaluated	1987 (Karen K. Swope, Archaeological Research Unit, UC Riverside, CA)
P-33-003250	CA-RIV-003250	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr and K. Swope, Archaeological Research Unit, UC Riverside, CA)
P-33-003251	CA-RIV-003251	Lithic scatter; Bedrock milling feature; Dam	Prehistoric, Historic	Not evaluated	1987 (R. Parr, K. Swope, V. deMunck and L. Broomhall, Archaeological Research Unit, UC Riverside, CA)
P-33-003252	CA-RIV-003252	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr and K. Swope, Archaeological Research Unit, UC Riverside, CA)
P-33-003253	CA-RIV-003253/H	Bedrock milling feature; Trash scatter	Prehistoric, Historic	Not evaluated	1987 (R. Parr, K. Swope and V. deMunck, Archaeological Research Unit, UC Riverside, CA)
P-33-003254	CA-RIV-003254/H	Bedrock milling feature; Cistern	Prehistoric, Historic	Likely not significant	1987 (R. Parr, K. Swope and V. deMunck, Archaeological Research Unit, UC Riverside, CA)
P-33-003255	CA-RIV-003255	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto and J. Schneider, Archaeological Research Unit, UC Riverside, CA)
P-33-003256	CA-RIV-003256	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto and J. Schneider, Archaeological Research Unit, UC Riverside, CA)
P-33-003257	CA-RIV-003257	Bedrock milling feature	Prehistoric	Likely not significant	1987 (D. Pinto and J. Schneider, Archaeological Research Unit, UC Riverside, CA)
P-33-003258	CA-RIV-003258	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr, Archaeological Research Unit, UC Riverside, CA)
P-33-003259	CA-RIV-003259	Bedrock milling feature	Prehistoric	Not evaluated	1987 (R. Parr, D. Pinto, K. Swope and V. deMunck, Archaeological Research Unit, UC Riverside, CA)
P-33-003260	CA-RIV-003260	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr, Archaeological Research Unit, UC Riverside, CA)
P-33-003261	CA-RIV-003261	Bedrock milling feature; Farm/ ranch	Prehistoric, Historic	Not evaluated	1987 (R. Parr, K. Swope and B. Neiditch, Archaeological Research Unit, UC Riverside, CA); 2009 (Jeanette A McKenna, McKenna et al.)
P-33-003262	CA-RIV-003262	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr and C. Prior, Archaeological Research Unit, UC Riverside, CA)
P-33-003263	CA-RIV-003263	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr, K. Swope, R. Yohe and C. Prior, Archaeological Research Unit, UC Riverside, CA)
P-33-003264	CA-RIV-003264	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr, K. Swope, R. Yohe and C. Prior, Archaeological Research Unit, UC Riverside, CA)
P-33-003265	CA-RIV-003265	Bedrock milling feature	Prehistoric	Likely not significant	1987 (K. Swope, R. Yohe and C. Prior, Archaeological Research Unit, UC Riverside, CA)
P-33-003266	CA-RIV-003266	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr and B. Neiditch, Archaeological Research Unit, UC Riverside, CA)
P-33-003267	CA-RIV-003267	Bedrock milling feature; Rock shelter	Prehistoric	Not evaluated	1987 (R. Parr, R. Yohe, B. Neiditch, B. Arkush and D. Everson, Archaeological Research Unit, UC Riverside, CA)

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List of Archaeological Resources and their Eligibility**

Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-003268	CA-RIV-003268	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr, R. Yohe, B. Arkush, B. Neiditch and D. Everson, Archaeological Research Unit, UC Riverside, CA)
P-33-003269	CA-RIV-003269	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr, R. Yohe, B. Arkush, B. Neiditch and D. Everson, Archaeological Research Unit, UC Riverside, CA)
P-33-003270	CA-RIV-003270	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr and D. Everson, Archaeological Research Unit, UC Riverside, CA)
P-33-003271	CA-RIV-003271	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr, K. Swope and K. Halloran, Archaeological Research Unit, UC Riverside, CA); 2006 (Jeanette A. McKenna, McKenna et al., Whittier, CA)
P-33-003273	CA-RIV-003273	Bedrock milling feature	Prehistoric	Not evaluated	1987 (R. Parr, K. Swope and K. Halloran, Archaeological Research Unit, UC Riverside, CA)
P-33-003304	CA-RIV-003304	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr and B. Arkush, Archaeological Research Unit, UC Riverside, CA)
P-33-003305	CA-RIV-003305	Bedrock milling feature	Prehistoric	Likely not significant	1987 (R. Parr, Archaeological Research Unit, UC Riverside, CA)
P-33-003306	CA-RIV-003306	Bedrock milling feature	Prehistoric	Not evaluated	1987 (R. Parr and B. Arkush, Archaeological Research Unit, UC Riverside, CA)
P-33-003307	CA-RIV-003307	Bedrock milling feature	Prehistoric	Not significant	1987 (K.J. Peter and L.A. Carbone, Scientific Resource Surveys, Inc., Huntington Beach, CA)
P-33-003323	CA-RIV-003323	Bedrock milling feature	Prehistoric	Not evaluated	1987 (Michael Sampson, CA Dept of Parks and Recreation, Southern Region Headquarters, San Diego, CA)
P-33-003340	CA-RIV-003340	Lithic scatter, ground stone	Prehistoric	Likely not significant	1987 (Joan Brown, Blanch Schmitz and Ronald M. Bissell, RMW Paleo Associates, Mission Viejo, CA)
P-33-003341	CA-RIV-003341	Bedrock milling feature	Prehistoric	Not evaluated	1987 (C. Prior, M. Conroy and B. Neiditch, Archaeological Research Unit, UC Riverside, CA)
P-33-003342	CA-RIV-003342	Bedrock milling feature	Prehistoric	Destroyed	1987 (Barry R. Neiditch, Archaeological Research Unit, UC Riverside, CA); 2013 (Daniel Ballester and Daniel Perez, CRM TECH)
P-33-003343	CA-RIV-003343	Bedrock milling feature	Prehistoric	Not significant	1987 (Barry R. Neiditch, Archaeological Research Unit, UC Riverside, CA); 2006 (M. Dice, Michael Brandman Associates, Irvine, CA)
P-33-003344	CA-RIV-003344	Bedrock milling feature	Prehistoric	Not significant	1987 (Barry R. Neiditch, Archaeological Research Unit, UC Riverside, CA); 2006 (M. Dice, Michael Brandman Associates, Irvine, CA)
P-33-003345	CA-RIV-003345	Bedrock milling feature	Prehistoric	Not significant	1987 (Barry R. Neiditch, Archaeological Research Unit, UC Riverside, CA); 2006 (M. Dice, Michael Brandman Associates, Irvine, CA)
P-33-003346	CA-RIV-003346	Lithic scatter; Bedrock milling feature	Prehistoric	Significant	1987 (Daniel F. McCarthy and Barry R. Neiditch, Archaeological Research Unit, UC Riverside, CA); 1990 (Brooke S. Arkush, Archaeological Research Unit, UC Riverside, CA); 2006 (M. Dice, Michael Brandman Associates, Irvine, CA)
P-33-003347	CA-RIV-003347	Lithic scatter; Bedrock milling feature	Prehistoric	Not evaluated	1987 (Daniel F. McCarthy and Barry R. Neiditch, Archaeological Research Unit, UC Riverside, CA); 1990 (Brooke S. Arkush, Archaeological Research Unit, UC Riverside, CA); 2011 (Archaeological Staff, Michael Brandman Associates)
P-33-003959	CA-RIV-003959	Bedrock milling feature	Prehistoric	Likely not significant	1990 (C. E. Drover and D. M. Smith, Christopher Drover); 2004 (P. Fulton/N. Lawson, LSA Associates, Inc.)
P-33-003960	CA-RIV-003960	Bedrock milling feature	Prehistoric	Likely not significant	1990 (C. E. Drover and D. M. Smith, Christopher Drover)

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Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-003961	CA-RIV-003961	Bedrock milling feature	Prehistoric	Likely not significant	1990 (C. E. Drover and D. M. Smith, Christopher Drover)
P-33-003962	CA-RIV-003962	Bedrock milling feature	Prehistoric	Likely not significant	1990 (C. E. Drover and D. M. Smith, Christopher Drover); 2004 (P. Fulton/N. Lawson, LSA Associates, Inc.)
P-33-003963	CA-RIV-003963	Bedrock milling feature	Prehistoric	Not significant	1990 (C. E. Drover and D. M. Smith, Christopher Drover); 2004 (P. Fulton/N. Lawson, LSA Associates, Inc.)
P-33-003964	CA-RIV-003964	Bedrock milling feature	Prehistoric	Likely not significant	1990 (C. E. Drover and D. M. Smith, Christopher Drover)
P-33-003965	CA-RIV-003965	Bedrock milling feature	Prehistoric	Not significant	1990 (C. E. Drover and D. M. Smith, Christopher Drover); 2004 (P. Fulton/N. Lawson, LSA Associates, Inc.)
P-33-003966	CA-RIV-003966	Bedrock milling feature	Prehistoric	Not significant	1990 (C. E. Drover and D. M. Smith, Christopher Drover); 2004 (P. Fulton/N. Lawson, LSA Associates, Inc.)
P-33-004181	CA-RIV-004181	Bedrock milling feature	Prehistoric	Likely not significant	1991 (J. Keller, Jean A. Keller, Consulting Archaeologist, 27475 Ynez Road, No. 450, Temecula CA 92390)
P-33-004183	CA-RIV-004183	Bedrock milling feature	Prehistoric	Not evaluated	1991 (J. Keller, Jean A. Keller, Consulting Archaeologist, 27475 Ynez Road, No. 450, Temecula CA 92390); 2002 (Daniel Ballester, CRM TECH)
P-33-004184	CA-RIV-004184	Bedrock milling feature	Prehistoric	Not evaluated	1991 (J. Keller, Jean A. Keller, Consulting Archaeologist, 27475 Ynez Road, No. 450, Temecula CA 92390); 2002 (Daniel Ballester, CRM TECH)
P-33-004185	CA-RIV-004185	Bedrock milling feature	Prehistoric	Not evaluated	1991 (J. Keller, Jean A. Keller, Consulting Archaeologist, 27475 Ynez Road, No. 450, Temecula CA, 92390); 2002 (Daniel Ballester, CRM TECH)
P-33-004186	CA-RIV-004186	Bedrock milling feature	Prehistoric	Not evaluated	1991 (J. Keller, Jean A. Keller, Consulting Archaeologist, 27475 Ynez Road, No. 450, Temecula, CA 92390); 2002 (Daniel Ballester, CRM TECH)
P-33-004187	CA-RIV-004187	Bedrock milling feature	Prehistoric	Likely not significant	1991 (J. Keller, Jean A. Keller, Consulting Archaeologist, 27475 Ynez Road, No. 450, Temecula, CA 92390)
P-33-004188	CA-RIV-004188	Bedrock milling feature	Prehistoric	Not evaluated	1991 (J. Keller, Jean A. Keller, Consulting Archaeologist, 27475 Ynez Road, No. 450, Temecula, CA 92390); 2002 (Daniel Ballester, CRM TECH)
P-33-004189	CA-RIV-004189	Bedrock milling feature	Prehistoric	Likely not significant	1991 (J. Keller, Jean A. Keller, Consulting Archaeologist, 27475 Ynez Road, No. 450, Temecula CA 92390)
P-33-004201	CA-RIV-004201	Foundation; Trash scatter	Historic	Not evaluated	1990 (James J. Schmidt and Gwendolyn Romani, Greenwood and Associates, 725 Jacon Way, 725 Jacon Way, Pacific Palisades, CA 90272, (213) 454-3091)
P-33-004206	CA-RIV-004206	Bedrock milling feature	Prehistoric	Likely not significant	1990 (James J. Schmidt, June Schmidt, Jeanne Binning, and Tricia Webb, Greenwood and Associates, 725 Jacon Way, 725 Jacon Way, Pacific Palisades, CA 90272 (213) 454-3091)
P-33-004210	CA-RIV-004210	Foundation; Trash scatter	Historic	Not evaluated	1990 (James J. Schmidt, and Gwendolyn Romani, Greenwood and Associates, 725 Jacon Way, Pacific Palisades, CA 90272 (213) 454-3091)
P-33-004212	CA-RIV-004212	Lithic scatter, ground stone	Prehistoric	Likely not significant	1990 (James J. Schmidt, Kathy VanderVeen, James Kenney, and Lisa LeCount, Greenwood and Associates, 725 Jacon Way, Pacific Palisades, CA 90272 (213) 454-3091)

**Table 4.5-2  
List of Archaeological Resources and their Eligibility**

Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-004286	CA-RIV-004286	Grave; Physically overlaps or intersects 33-028830 and 33-013710	Historic	Destroyed	1979 (M.A. Brown, n/a)
P-33-004924	CA-RIV-004924	Bedrock milling feature	Prehistoric	Likely not significant	1992 (M. Hogan, UC Riverside Archaeological Research Unit)
P-33-004925	CA-RIV-004925	Bedrock milling feature	Prehistoric	Likely not significant	1992 (M. Hogan, UC Riverside Archaeological Research Unit)
P-33-007910	CA-RIV-005862H	Foundations; Privy and Trash scatter; Cistern; Standing structures;	Historic	Not evaluated	1995 (James J. Schmidt and Gwendolyn Romani, Greenwood and Associates)
P-33-008168	CA-RIV-006065	Lithic scatter; Faunal remains	Prehistoric	Significant	1998 (M. Horne, Applied EarthWorks, Inc., Hemet, CA)
P-33-008169	CA-RIV-006066	Lithic scatter; Faunal remains	Prehistoric	Significant	1998 (M. Horne, Applied EarthWorks, Inc., Hemet, CA)
P-33-008170	CA-RIV-006067	Lithic scatter	Prehistoric	Significant	1998 (M. Horne, Applied EarthWorks, Inc., Hemet, CA)
P-33-008171	CA-RIV-006068	Lithic scatter, ground stone; Faunal remains	Prehistoric	Significant	1998 (M. Horne, Applied EarthWorks, Inc., Hemet, CA)
P-33-008266	CA-RIV-006084	Lithic scatter, ground stone; Faunal remains	Prehistoric	Significant	1998 (M. Horne, Applied EarthWorks, Inc., Hemet, CA)
P-33-008709	CA-RIV-006200	Hearths/ pits	Prehistoric	Significant	1999 (M. Horne, Applied EarthWorks, Inc., Hemet, CA)
P-33-011606	CA-RIV-006914	Bedrock milling feature	Prehistoric	Likely not significant	2002 (Riordan L. Goodwin, LSA Associates)
P-33-011621		Foundation; Walls; Standing structures; Farm	Historic	Not evaluated	1980 (Terence N. D'Altroy, Environmental Resources Group)
P-33-011622		Isolate - biface midsection	Prehistoric	Not significant	1980 (Terence N. D'Altroy, Environmental Resources Group)
P-33-012118	CA-RIV-006943/H	Bedrock milling feature; Foundations; Trash scatter; Road; Walls	Prehistoric, Historic	Significant	2002 (Daniel Ballester, CRM TECH)
P-33-012635		Bedrock milling feature	Prehistoric	Likely not significant	1984 (S. Bouscaren etc., ARU, UC Riverside)
P-33-012636		Bedrock milling feature	Prehistoric	Likely not significant	1984 (S. Bouscaren etc., ARU, UC Riverside)
P-33-012637		Bedrock milling feature	Prehistoric	Likely not significant	1984 (S. Bouscaren etc., ARU, UC Riverside)
P-33-012638		Bedrock milling feature	Prehistoric	Likely not significant	1984 (S. Bouscaren Etc., ARU, UC Riverside)
P-33-012817		Bedrock milling feature	Prehistoric	Not significant	1981 (L.L. Bowles, n/a); 2006 (Kristie R. Blevins, L&L Environmental, Inc.)

**Table 4.5-2  
List of Archaeological Resources and their Eligibility**

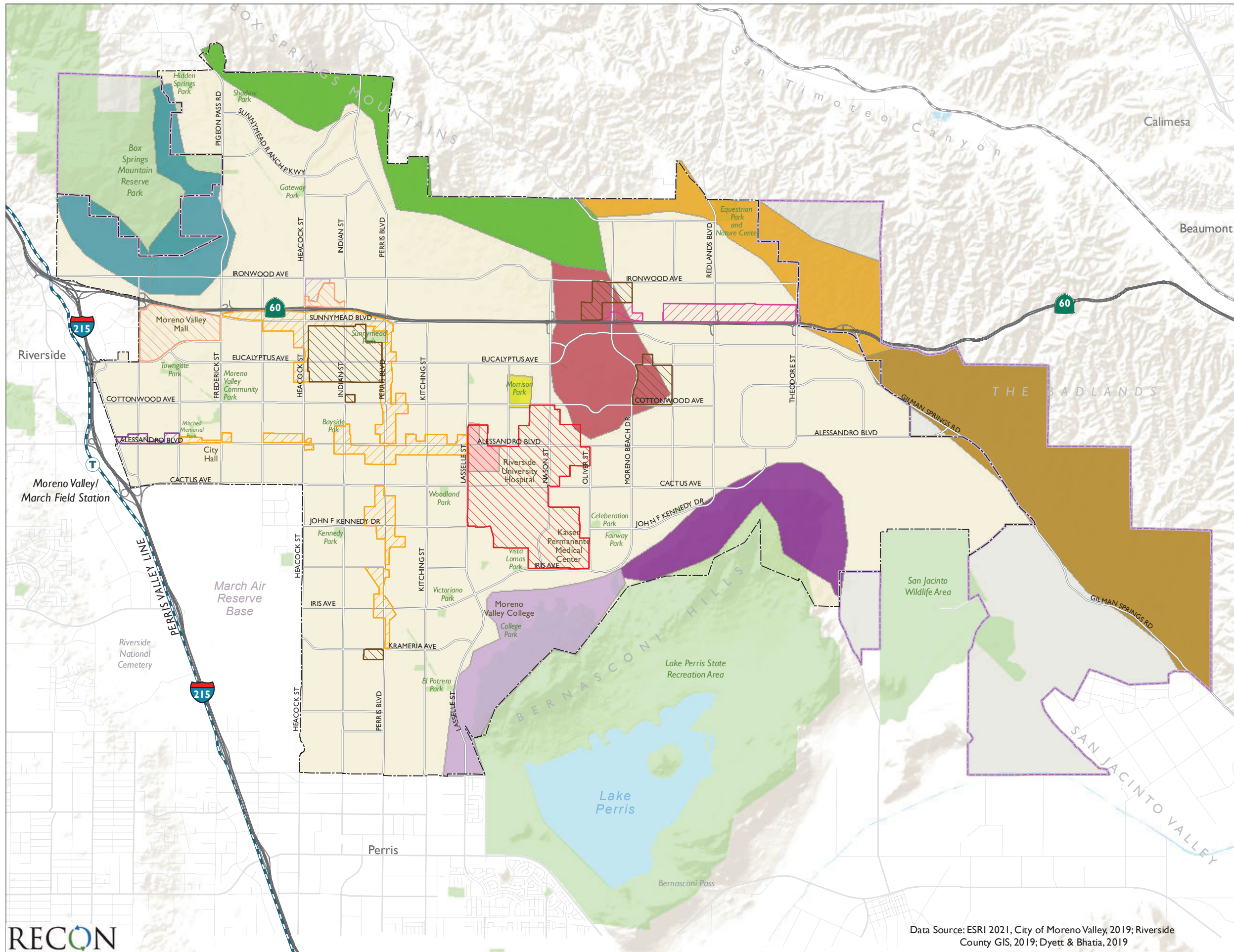
Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-012933	CA-RIV-007172	Lithic scatter, ground stone; Habitation debris; Other	Prehistoric	Not NR eligible	2003 (Smith, David M., and Ron Norton, The Keith Companies, Inc.); 2006 (Toenjes, Julianne, Sarah Mattiussi, and Rachael Nixon, Stantec); 2007 (Toenjes, Julianne, Sarah Mattiussi, and Rachael Nixon, Stantec)
P-33-012934		Isolate - mano	Prehistoric	Not significant	2003 (Smith, David M., and Ron Norton, The Keith Companies, Inc.); 2007 (Toenjes, Julianne and Sarah Mattiussi, Stantec Consulting)
P-33-012935		Isolate - core	Prehistoric	Not significant	2003 (Smith, David M., and Ron Norton, The Keith Companies, Inc.); 2007 (Toenjes, Julianne and Sarah Mattiussi, Stantec Consulting)
P-33-012936		Isolate - mano	Prehistoric	Not significant	2003 (Smith, David M., and Ron Norton, The Keith Companies); 2007 (Julianne Toenjes and Sarah Mattiussi, Stantec)
P-33-012937	CA-RIV-007173	Lithic scatter, ground stone	Prehistoric	Not significant	2003 (Smith, David M., and Ron Norton, The Keith Companies, Inc.); 2006 (Toenjes, Julianne, Sarah Mattiussi, and Rachael Nixon, Stantec)
P-33-012938		Isolate - mano	Prehistoric	Not significant	2003 (Smith, David M., and Ron Norton, The Keith Companies); 2007 (Toenjes, Julianne, Stantec Consulting)
P-33-013110	CA-RIV-007307	Bedrock milling feature; Cairns	Prehistoric	Not evaluated	1983 (Thomas Banks, Scientific Resource Surveys)
P-33-013607		Isolate: mano	Prehistoric	Not significant	1991 (Jean A. Keller, Jean A. Keller, Consulting Archaeologist)
P-33-013710		Grave	Historic	Destroyed	1979 (Brown, M.A., n/a)
P-33-013711		Isolate - mano	Prehistoric	Not significant	1974 (Jefferson, P. and H. Clough, n/a)
P-33-013825		Isolate - metate	Prehistoric	Not significant	2004 (Harris, N., Harris Arch Cons.)
P-33-013848		Isolate - metate	Prehistoric	Not significant	2004 (Smith, David M., The Keith Companies, Inc); 2007 (Toenjes, Julianne and Sarah Mattiussi, Stantec Consulting)
P-33-013849		Isolate - mano	Prehistoric	Not significant	2004 (Smith, David M., The Keith Companies, Inc.); 2007 (Toenjes, Julianne and Sarah Mattiussi, Stantec Consulting)
P-33-013850		Isolate - flake	Prehistoric	Not significant	2004 (Smith, David M., The Keith Companies, Inc); 2007 (Toenjes, Julianne and Sarah Mattiussi, Stantec Consulting)
P-33-015016		Isolate - mano	Prehistoric	Not significant	2004 (Fulton, P. and N. Lawson, LSA Associates, Inc.)
P-33-015017	CA-RIV-007981	Bedrock milling feature	Prehistoric	Likely not significant	2004 (Fulton, P. and N. Lawson, LSA Associates, Inc.)
P-33-015018	CA-RIV-007982	Bedrock milling feature	Prehistoric	Likely not significant	2004 (Fulton, P. and N. Lawson, LSA Associates, Inc.)
P-33-015019	CA-RIV-007983	Bedrock milling feature	Prehistoric	Likely not significant	2004 (Fulton, P. and N. Lawson, LSA Associates, Inc.)
P-33-015020	CA-RIV-007984	Bedrock milling feature	Prehistoric	Likely not significant	2004 (Fulton, P. and N. Lawson, LSA Associates, Inc.)
P-33-015021	CA-RIV-007985	Bedrock milling feature	Prehistoric	Likely not significant	2004 (Fulton, P. and N. Lawson, LSA Associates, Inc.)
P-33-015022	CA-RIV-007986	Bedrock milling feature	Prehistoric	Likely not significant	2004 (Fulton, P. and N. Lawson, LSA Associates, Inc.)

**Table 4.5-2  
List of Archaeological Resources and their Eligibility**

Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-015023	CA-RIV-007987	Bedrock milling feature	Prehistoric	Likely not significant	2004 (Fulton, P. and N. Lawson, LSA Associates, Inc.)
P-33-015024	CA-RIV-007988	Trash scatter	Historic	Not significant	2005 (Brunzell, David and Rory Goodwin, LSA Associates, Inc.)
P-33-015028	CA-RIV-007992	Trash scatter	Historic	Not significant	2004 (Goodwin, Riordan, LSA Associates, Inc.)
P-33-015031	CA-RIV-007995	Trash scatter	Historic	Not significant	2004 (Goodwin, Riordan, LSA Associates, Inc.)
P-33-015032	CA-RIV-007996	Bedrock milling feature	Prehistoric	Likely not significant	2004 (Fulton, P. and N. Lawson, LSA Associates, Inc.)
P-33-015045	CA-RIV-008006	Bedrock milling feature	Prehistoric	Not significant	2006 (Dice, M., Michael Brandman Associates)
P-33-015046	CA-RIV-008007	Bedrock milling feature	Prehistoric	Not significant	2006 (Dice, Michael, Michael Brandman Associates)
P-33-015147	CA-RIV-008056	Bedrock milling feature	Prehistoric	Likely not significant	2006 (Moslak, Ken, ASM Affiliates, Inc.); 2017 (H. Murphy, K. Stankowski, M. Jorgensen, D. Faith, Tierra Environmental Services)
P-33-015148		Bedrock milling feature	Prehistoric	Likely not significant	2006 (Moslak, Ken, ASM Affiliates, Inc.); 2017 (H. Murphy, K. Stankowski, B. Bolger, M. Jorgensen and D. Faith, Tierra Environmental Services)
P-33-015149		Bedrock milling feature	Prehistoric	Likely not significant	2006 (Moslak, Ken, ASM Affiliates, Inc.); 2017 (H. Murphy, K. Stankowski, B. Bolger, Jm. Jorgensen and D. Faith, Tierra Environmental Services)
P-33-015150		Bedrock milling feature	Prehistoric	Likely not significant	2006 (Moslak, Ken, ASM Affiliates, Inc.); 2017 (H. Murphy, K. Stankowski, B. Bolger, M. Jorgensen and D. Faith, Tierra Environmental Service)
P-33-015301		Isolate - pestle	Prehistoric	Not significant	2005 (Chandler, Evelyn, Ecorp Consulting, Inc.)
P-33-015320	CA-RIV-008088	Bedrock milling feature	Prehistoric	Likely not significant	2004 (Fulton, P. and N. Lawson, LSA Associates, Inc.)
P-33-015454	CA-RIV-008149	Foundation; Trash scatter; Wells/ cistern (septic tank)	Historic	Not evaluated	2006 (John Stephen Alexandrowicz, Archaeological Consulting Services)
P-33-015648		Isolate - metate	Prehistoric	Not significant	2006 (J. Sanka, Michael Brandman Associates)
P-33-015675	CA-RIV-008168	Foundations; Trash scatter; Water conveyance system	Historic	Likely not significant	2006 (J. Sanka, Michael Brandman Associates)
P-33-015937	CA-RIV-008274	Bedrock milling feature; Foundations; Trash scatter; Wells/ cisterns	Prehistoric, Historic	Not evaluated	2007 (Ballester, Daniel, CRM TECH)
P-33-015967		Isolate - mano	Prehistoric	Not significant	2007 (Daniel Ballester, CRM TECH)

**Table 4.5-2  
List of Archaeological Resources and their Eligibility**

Primary Number	Trinomial Number	Resource Type	Age	Eligibility	Recording Events
P-33-016690		Isolate - core	Prehistoric	Not significant	2007 (Shanka, J, Michael Brandman Associates)
P-33-016788		Bedrock milling feature	Prehistoric	Not significant	2007 (Sanka, J., Michael Brandman Associates)
P-33-017851		Isolate - mano	Prehistoric	Not significant	2009 (Daniel Ballester, CRM TECH, Colton, CA)
P-33-019873		Isolate - metate	Prehistoric	Not significant	2010 (M. Dice, Michael Brandman Associates)
P-33-019874		Isolate - flake	Prehistoric	Not significant	2010 (M. Dice, Michael Brandman Associates)
P-33-024195	CA-RIV-011896	Multiple family property; Farm/ ranch; Privies	Historic	Not significant	2015 (Jeanette McKenna, McKenna et al.)
P-33-024882	CA-RIV-012333	Bedrock milling feature	Prehistoric	Likely not significant	2014 (Kyle Garcia, Chris Purcell, and Lauren Willey, PCR Services Corporation)
P-33-024883		Isolate - hammerstone	Prehistoric	Not significant	2014 (Kyle Garcia, Chris Purcell and Lauren Willey, PCR Services Corporation)
P-33-028072	CA-RIV-012673	Trash scatter	Historic	Not significant	2015 (Cynthia Morales, CRM TECH)
P-33-028073	CA-RIV-012674	Trash scatter	Historic	Not significant	2015 (Cynthia Morales, CRM TECH)
P-33-028080	CA-RIV-012677	Bedrock milling feature	Prehistoric	Likely not significant	2017 (H. Murphy, K. Stankowski, M. Jorgensen & D. Faith, Tierra Environmental Services, Inc.)
P-33-028082	CA-RIV-012679	Rock shelter	Prehistoric	Not evaluated	2017 (H. Murphy, Tierra Environmental Services, Inc.)
P-33-028083	CA-RIV-012680	Bedrock milling feature	Prehistoric	Likely not significant	2017 (H. Murphy, K. Stankowski, R. Bolger, M. Jorgensen & D. Faith, Environmental Services, Inc.)
P-33-028084	CA-RIV-012681	Bedrock milling feature	Prehistoric	Likely not significant	2017 (H. Murphy, K. Stankowski, M. Jorgensen & D. Faith, Tierra Environmental Services, Inc.)
P-33-028085	CA-RIV-012682	Bedrock milling feature	Prehistoric	Likely not significant	2017 (H. Murphy, K. Stankowski, M. Jorgensen, and D. Faith, Tierra Environmental Services, Inc.)
P-33-028163	CA-RIV-012706	Isolate - lithic tool; Trash scatter	Prehistoric, Historic	Not evaluated	2018 (P. de Barros, H. Murphy of Tierra Environmental)



- City of Moreno Valley
- Sphere of Influence
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes
- Archaeological Sensitive Areas**
- Pigeon Pass Valley/  
Box Springs Mountains Complex
- Pigeon Pass Valley/  
Reche Hills Complex
- Moreno Hills Complex
- North Badlands Complex
- South Badlands/  
Eden Hot Springs Complex
- Wolfskill Ranch North Complex
- Wolfskill Ranch West Complex
- Moreno School Complex
- Laselle and Brodiaea Complex



**FIGURE 4.5-2**  
Archaeological Sensitive Areas

Data Source: ESRI 2021, City of Moreno Valley, 2019; Riverside County GIS, 2019; Dyett & Bhatia, 2019





Properties may qualify for NRHP listing if they qualify under the following criteria:

- Criterion A: Associated with events that have made a significant contribution to the broad patterns of history;
- Criterion B: Associated with the lives of persons significant in the past;
- Criterion C: Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values, represent a significant and distinguishable entity whose components may lack individual distinction; or
- Criterion D: Have yielded, or may be likely to yield, information important in prehistory or history.

Structures and features must usually be at least 50 years old to be considered for listing on the NRHP, barring exceptional circumstances. According to the NRHP guidelines, a resource must retain its integrity, or the “ability to convey its significance.” The seven aspects of integrity are location, design, setting, materials, workmanship, feeling and association.

## **b. Federal Native American Graves Protection and Repatriation Act**

The Native American Graves Protection and Repatriation Act (NAGPRA) is a federal law that was established in 1990. NAGPRA provides a process for museums and federal agencies to return certain Native American cultural items – human remains, funerary objects, sacred objects, or objects of cultural patrimony – to lineal descendants, and culturally affiliated Indian tribes and Native Hawaiian organizations. NAGPRA includes provisions for unclaimed and culturally unidentifiable Native American cultural items, intentional and inadvertent discovery of Native American cultural items on federal and tribal lands, and penalties for noncompliance and illegal trafficking in these items. Implementation of the proposed project would be conducted in compliance with NAGPRA. On March 15, 2010, the Department of the Interior issued a final rule on 43 Code of Federal Regulations (CFR) Part 10, of the NAGPRA Regulations – Disposition of Culturally Unidentifiable Human Remains. The final rule implements NAGPRA by adding procedures for the disposition of culturally unidentifiable Native American human remains in the possession or control of museums or federal agencies. The rule also amends sections related to purpose and applicability of the regulations, definitions, inventories of human remains and related funerary objects, civil penalties, and limitations and remedies. The rule became effective on May 14, 2010.

Federal curation regulations are also provided in 36 CFR 79, which apply to collections that are excavated or removed under the authority of the Antiquities Act (16 United States Code [USC] 431-433), the Reservoir Salvage Act (16 USC 469-469c), Section 110 of the NHPA (16 USC 470h-2), or the Archaeological Resources Protection Act (16 USC 470aa-mm). Such collections generally include those that are the result of a prehistoric or historic resources survey, excavation or other study conducted in connection with a federal action, assistance, license or permit.

## 4.5.2.2 State

### a. CEQA Guidelines and California Register of Historical Resources

California Code of Regulations (CCR) Section 15064.5, The California Code of Regulations, Title 14, Chapter 3, § 15064.5 (the State CEQA Guidelines) establishes the procedure for determining the significance of impacts to archeological and historical resources, as well as classifying the type of resource. Cultural resources are aspects of the environment that require identification and assessment for potential significance. The evaluation of cultural resources under CEQA is based upon the definitions of resources provided in State CEQA Guidelines § 15064.5, as follows:

- A resource listed in, or determined to be eligible by, the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code (PRC), or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the PRC, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in, or determined to be eligible for listing in, the CRHR, not included in a local register of historical resources (pursuant to section 5020.1(k) of the

Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

The California Register may also include properties listed in local registers of historic properties. A “local register of historic resources” is broadly defined in Section 5020.1(k) as “a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.” Local registers of historic properties come in two forms: (1) surveys of historic resources conducted by a local agency in accordance with Office of Historic Preservation procedures and standards, adopted by the local agency and maintained as current and (2) landmarks designated under local ordinances or resolutions (PRC Sections 5024.1, 21804.1, and 15064.5). The minimum age criterion for the California Register is 50 years. Properties less than 50 years old may be eligible for listing on the California Register, if “it can be demonstrated that sufficient time has passed to understand its historical importance” [Chapter 11, Title 14, Section 4842(d)(2)].

A tribal cultural resource may be considered significant if it is included in a local or state register of historical resources or determined by the lead agency to be significant pursuant to criteria set forth in PRC Section 5024.1; is a geographically defined cultural landscape that meets one or more of these criteria; or is a historical resource described in PRC Section 21084.1, a unique archaeological resource described in PRC Section 21083.2, or a non-unique archaeological resource if it conforms with the above criteria.

### **b. California Health and Safety Code Sections 7050.5, 7051, and 7054**

These sections collectively address the illegality of interference with human burial remains, as well as the disposition of Native American burials in archaeological sites. The law protects such remains from disturbance, vandalism, or inadvertent destruction, and establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including the treatment of remains prior to, during, and after evaluation, and reburial procedures. Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98 (refer to second paragraph below). The County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric (Native American), the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendent (MLD). The MLD shall complete the inspection of the site within 48 hours of notification, and may recommend scientific removal and non-destructive analysis of human remains and items associated with Native American burials.

### **c. Native American Historic Cultural and Sanctified Cemetery Sites (PRC Section 5097 et seq.)**

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes

procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to a year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR. In the fall of 2006, the law was amended to revise the process for the discovery of Native American remains during land development. The revisions encourage culturally sensitive treatment of Native American remains, and to require meaningful discussions and agreements concerning treatment of the remains at the earliest possible time. The intent is to foster the preservation and avoidance of human remains during development. The changes in the law allow additional time to notify, consult and confer with the Most Likely Descendent/Native American representatives on any given project. In addition, the new language provides more protection for re-interment sites.

Specifically, PRC Section 5097.9 states that no public agency, and no private party using or occupying public property or operating on public property, shall interfere with the free expression or exercise of Native American religion, nor shall any such agency cause severe or irreparable damage to any Native American Sanctified Cemetery, place of worship, religious or ceremonial site, or sacred shrine located on public property, except on a clear and convincing showing that the public interest and necessity so require.

#### **d. Assembly Bill 52**

As of July 1, 2015, PRC Section 21084.2 establishes that “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment.” Assembly Bill (AB) 52 requires lead agencies to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. If a project will result in an adverse effect to tribal cultural resource, the lead agency must consider measures to mitigate the impact.

#### **e. Senate Bill 18**

As of March 1, 2005, Senate Bill (SB) 18 permits California Native American tribes recognized by the NAHC to hold conservation easements on terms mutually satisfactory to the tribe and the landowner. The term “California Native American tribe” is defined as “a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC.” The bill also requires that, prior to the adoption or amendment of a city or county’s general plan, the city or county consult with California Native American tribes for the purpose of preserving specified places, features, and objects located within the city or county’s jurisdiction. SB 18 also applies to the adoption or amendment of specific plans. This bill requires the planning agency to refer to the California Native American tribes specified by the NAHC and to provide them with opportunities for involvement.

### **4.5.2.3 Local Regulations**

#### **a. City of Moreno Valley General Plan Policies and Municipal Code**

The 2021 GPU includes goals and policies that would serve to preserve historical resources within the Planning Area. The Open Space and Resource Conservation Element includes a goal to preserve and respect Moreno Valley's unique cultural and scenic resources, recognizing their contribution to local character and sense of place.

#### **b. Municipal Code, Heritage Trees**

Title 9, Chapter 9.17.030, Section G of the Municipal Code identifies Heritage Trees as any tree that defines the historical and cultural character of the city including older Palm and Olive trees, and/or any tree designated as such by official action. The regulation prohibits any person from removing, destroying, or disfiguring a heritage tree within the city limits. Removal of a heritage tree designated historic and/or culturally significant by official action shall require the review of the ecological historical preservation board. The ordinance provides certain exceptions and exemptions from the Heritage Tree requirements.

#### **c. Municipal Code, Cultural Preservation**

Title 7, Cultural Preservation of the Municipal Code promotes public health, safety, and general welfare by providing for the preservation, identification, protection, enhancement and perpetuation of existing improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets and natural features having special cultural, historical, archaeological, architectural or community value in the city. Per Chapters 7.05 and 7.07, landmarks, structures of merit, and preservation districts and neighborhood conservation areas can be designated by a committee or by the city council on appeal. Title 7, Chapter 7.09.010 requires a permit to restore, rehabilitate, alter, develop, construct, demolish, remove or change the appearance of any landmark, landmark structure, landmark site, or any structure or site within a preservation district.

### **4.5.3 Methodologies for Determining Impacts**

Preparation of this EIR section began with a review of the record search results completed by the EIC for the Planning Area, as well as existing cultural resources information from the 2006 Moreno Valley General Plan Program EIR. This existing data was used to develop a cultural resources sensitivity map that was compared to the Concept Areas and Community Corridors to determine the potential to impact existing cultural resources within the Planning Area. This was followed by an evaluation of how proposed 2021 GPU goals would serve to either preserve or impact cultural resources within the Planning Area.

## 4.5.4 Basis for Determining Significance

Thresholds used to evaluate impacts related to cultural resources are based on applicable criteria in the CEQA Guidelines (CCR Sections 15000-15387), Appendix G. A significant impact related to cultural resources would occur if the project would:

- 1) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;
- 2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
- 3) Disturb any human remains, including those interred outside of dedicated cemeteries.

Additionally, a significant impact related to tribal cultural resources would occur if the project would:

- 4) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
  - a) Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
  - b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American.

## 4.5.5 Impact Analysis

### 4.5.5.1 Topic 1: Historic Resources

*Would the project cause a substantial adverse change in the significance of an historic-era resource pursuant to CEQA Section 15064.5?*

As documented in Section 4.5.1.4.a above, a review of recent aerial photographs and historic-era resources from the EIC record search identified a total of 48 existing resources within the Planning Area (see Figure 4.5-1). One resource is listed as California Point of Historical Interest. Potentially significant historic resources within the Planning Area include four resources that have been recommended eligible for the NRHR/CRHR and three that have been recommended eligible for a local listing or designation. The majority of potentially significant historic resources within the Planning Area have not been evaluated for significance under CEQA.

Impacts from future development on the built environment would occur at the project level. Any alteration, relocation, or demolition associated with future development that would affect historic buildings, structures, objects, landscapes, and sites over 50 years of age would represent a potentially significant impact to historical resources. Future development and redevelopment would be required to adhere to CEQA and relevant portions of the Municipal Code. Per Title 9, Chapter 9.17.030, Section G future projects would be required to protect heritage trees. Additionally, per Title 7, Cultural Preservation, future projects would be evaluated for landmarks, structures of merit, preservation districts, and neighborhood conservation areas. Future projects involving significant historic structures or buildings listed on these lists would require a permit to restore, rehabilitate, alter, develop, construct, demolish, remove, or change the appearance. Furthermore, the 2021 GPU also includes goals that would serve to preserve cultural resources within the Planning Area. Open Space and Resource Conservation Goal 2 seeks to preserve Moreno Valley's unique cultural and scenic resources for their contribution to local character.

As shown in Figure 4.5-1, the proposed Concept Areas would avoid the majority of the known historic or potentially historic resources within the Planning Area. Nevertheless, the proposed Residential Density Change Concept Area located south of Sunnymead Boulevard and east of Heacock Street would overlap with the location of one resource identified as significant, and two resources recommended eligible for the National Register. Future development and redevelopment outside of the proposed Concept Areas consistent with the existing 2006 General Plan land use designations would also have the potential to impact known historic or potentially historic resources, including unrecorded historical resources that have not been evaluated or may become eligible for listing in the future. Furthermore, development within vacant lands may result in indirect impacts to the visual and setting integrity to significant historic resources. Therefore, the project would have the potential to cause a substantial adverse change in the significance of historic era resources, which would be considered a significant impact.

#### **4.5.5.2 Topic 2: Archaeological Resources**

*Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?*

As documented in Section 4.5.1.4.b above, the EIC record search identified a total of 255 archaeological resources within the Planning Area. The 2021 GPU includes goals that would serve to preserve cultural resources within the Planning Area. Open Space and Resource Conservation Goal 2 seeks to preserve Moreno Valley's unique cultural and scenic resources for their contribution to local character. As shown in Figure 4.5-2, the proposed Concept Areas would avoid the majority of the known archaeological resources within the Planning Area. Additionally, the Open Space and Resource Conservation Element (OSRC) of the 2021 GPU also includes goal, policy, and action that would serve to preserve cultural resources within the Planning Area.

**Goal**

OSRC-2: Preserve and respect Moreno Valley's unique cultural and scenic resources, recognizing their contribution to local character and sense of place.

**Policy**

OSRC.2-8 Require cultural resource assessments prior to the approval of development proposals on properties located in archaeologically sensitive areas.

**Action**

OSRC.2-B Maintain a map of sensitive archaeological sites in Moreno Valley and use it to inform project applicants of the need for cultural resource assessments.

Nevertheless, the proposed Highway Office/Commercial and two of the Residential Density Change Concept Areas would overlap with the Moreno Hills complex, and the proposed Downtown Center Concept Area would overlap with the Lasselle and Brodiaea complex. Additionally, the Highway Office/Commercial Concept Area would be located adjacent to the North Badlands complex, and the Downtown Center Concept Area would be located adjacent to the Moreno School complex. Future development and redevelopment outside of the proposed Concept Areas consistent with the existing 2006 General Plan land use designations would also have the potential to occur within known archaeologically sensitive complexes. Furthermore, future development and redevelopment within the Planning Area would have the potential to impact unrecorded archaeological resources that have not been evaluated or may become eligible for listing in the future. Therefore, implementation of future projects could result in the ground-disturbing activities within vacant land that could unearth unknown buried archaeological resources. Any grading, excavation, and other ground disturbing activities associated with future development that could expose buried archaeological resources and features, including sacred sites or TCPs, would be considered a significant impact.

**4.5.5.3 Topic 3: Human Remains**

*Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

The EIC record search did not identify any formal cemeteries or other resources that are known to currently possess human remains. Although the record search identified two historic grave sites, these sites have been destroyed and no longer possess human remains. However, due to the history of various Native American tribes and their presence throughout Moreno Valley and the SOI, there is the potential for human remains, including those interred outside of formal cemeteries, to be located within the Planning Area. Therefore, implementation of subsequent future projects could result in the ground-disturbing activities within vacant land that could unearth unknown buried human remains, which would be considered a significant impact.



#### 4.5.5.4 Topic 4: Tribal Cultural Resources

*Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, features, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*

- i) Listed or eligible for listing in the CRHR, or in a local register or*
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set form in subdivision c of PRC Section 5024.1?*

There is a potential to encounter buried resources associated with the material culture of traditional cultural territory used by the Luiseño, Gabrielino, and Cahuilla for thousands of years. Often tribal cultural resources as defined in CEQA PRC Section 21074 are associated with or in proximity to significant archaeological resources. The NAHC sacred lands search indicated the results are positive. They recommended contacting the Los Coyotes Band of Cahuilla and Cupeño Indians.

According to AB 52 and PRC 21080.3.1, the City must consult with traditionally and culturally affiliated Native American tribes to determine if a project will result in a substantial adverse change to tribal cultural resource. In an effort to determine the future potential impacts to tribal cultural resource, listed California Native American tribes that are traditionally and culturally affiliated with the geographic scope of the Planning Area were engaged for input regarding tribal cultural resources not yet formally recorded that could be impacted by subsequent projects. The City sent letters to the following tribes informing them of the project consistent with the requirements of AB 52:

- Agua Caliente Band of Cahuilla Indians
- Torres Martinez Desert Cahuilla Indians
- Morongo Band of Cahuilla Mission Indians
- Pechanga Cultural Resources Department
- Rincon of Luiseño Indians
- San Manuel Band of Mission Indians
- Soboba Band of Luiseño Indians

On May 19, 2020, Joseph Ontiveros, the Tribal Historic Preservation Officer for the Soboba Band of Luiseño Indians (Soboba), requested initiation of formal consultation under AB 52 with the City. Soboba stated that although the Planning Area is outside of their existing reservation, it does fall within the bounds of their Tribal Traditional Use Areas. Furthermore, the Planning Area includes known sites, is a recognized shared use area of trade between tribes, and is considered culturally sensitive to their people (Appendix C).

According to SB 18, the City must consult with California Native American tribes for the purpose of preserving specified places, features, and objects located within the City's jurisdiction. This applies prior to the adoption or amendment of a City's general plan and

specific plans. To comply with this, the City contacted the following for SB 18 consultation per a list provided by the Native American Heritage Commission:

- Agua Caliente Band of Cahuilla Indians
- Augustine Band of Cahuilla Mission Indians
- Cabazon Band of Mission Indians
- Cahuilla Band of Indians, Anza, CA
- Torres-Martinez Desert Cahuilla Indians
- Los Coyotes Band of Cahuilla and Cupeno Indians
- Morongo Band of Cahuilla Indians
- Pechanga Cultural Resources Department
- Fort Yuma Quechan
- Ramona Band of Cahuilla Indians
- Rincon Band of Luiseno Indians
- San Fernando Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- San Manuel Band of Mission Indians
- Soboba Band of Luiseno Indians

On May 4, 2020, H. Jill McCormick, Historic Preservation Officer for the Ft. Yuma Quechan Tribe, responded by notification of no comments regarding the project and that the tribe will defer to the more local tribes and support their decisions regarding the project (see Appendix C).

On May 19, 2020, Soboba has requested: (1) government-to-government consultation, which includes the transfer of information to Soboba regarding project progress as soon as new developments occur; (2) Soboba be considered a consulting tribal entity for this project; (3) since the possibility of encountering cultural resources during project construction/excavation phases is intensified due to working in and around traditional use areas, Soboba has requested that Native American monitor(s) from the Soboba Band of Luiseño Indians Cultural Resource Department be present during any ground disturbing activities, which would include archaeological surveys and testing; and (4) Soboba has requested that proper procedures be taken and tribal requests be honored (see Appendix C).

On May 28, 2020, Jessica Mauck, Director of Cultural Resources Management for the San Manuel Band of Luiseño Indians (SMBMI), responded with notification that a portion of the Planning Area exists within a sensitive portion of Serrano ancestral territory; therefore, SMBMI elected to consult on the project under both SB 18 and CEQA. SMBMI requested the provision of the following technical documents for tribal review: the cultural report; soil/geological study; and proposed project/zoning maps. SMBMI stated that the provision of this information will assist in project review and implementation (see Appendix C). The SMBMI included a map showing the overlap of the City's Planning Area with Serrano ancestral territory and the cultural areas of significance where their concerns will be focused (see Appendix C).

Subsequent projects implemented in accordance with the project would be subject to the provisions of AB 52 and may require tribal consultation with California Native American

tribes that are traditionally and culturally affiliated with the geographic scope of the Planning Area. Future AB 52 consultation may identify tribal cultural resources not yet found and formally recorded that could be impacted by subsequent projects. Grading of original in situ soils could also expose buried tribal cultural resources and features including sacred sites. Therefore, implementation of future projects could cause a substantial adverse change in the significance of a tribal cultural resource, which would be considered a significant impact.

## **4.5.6 Cumulative Analysis**

### **4.5.6.1 Topic 1: Historic Resources**

Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. Regardless of the efforts taken to avoid impacts to historic resources, the more land that is converted to developed uses, the greater the potential for impacts to historic resources. While individual projects can avoid or mitigate the direct loss of a specific resource, the effects would be cumulatively considerable, and therefore could result in a cumulatively significant impact.

### **4.5.6.2 Topic 2: Archaeological Resources**

Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. The loss of an archaeological resource due to mitigation by data recovery could be considered a cumulative impact.

Regardless of the efforts taken to avoid impacts to archaeological resources, the more land that is converted to developed uses, the greater the potential for impacts to archaeological resources. While individual projects can avoid or mitigate the direct loss of a specific resource, the effects would be cumulatively considerable, and therefore could result in a cumulatively significant impact.

### **4.5.6.3 Topic 3: Human Remains**

Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. The loss of an archaeological resource due to mitigation by data recovery could be considered a cumulative impact.

Regardless of the efforts taken to avoid impacts to archaeological resources, the more land that is converted to developed uses, the greater the potential for impacts to archaeological resources. While individual projects can avoid or mitigate the direct loss of a specific resource, the effects would be cumulatively considerable, and therefore could result in a cumulatively significant impact.

#### **4.5.6.4 Topic 4: Tribal Cultural Resources**

Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. The loss of an archaeological resource due to mitigation by data recovery could be considered a cumulative impact.

Regardless of the efforts taken to avoid impacts to archaeological resources, the more land that is converted to developed uses, the greater the potential for impacts to archaeological resources. While individual projects can avoid or mitigate the direct loss of a specific resource, the effects would be cumulatively considerable, and therefore could result in a cumulatively significant impact.

### **4.5.7 Significance of Impacts before Mitigation**

#### **4.5.7.1 Topic 1: Historic Resources**

Analysis of impacts from future development on the built-environment would be required at the project level. Any alteration, relocation, demolition, or excessive groundborne vibration associated with future development that would affect historic buildings, structures, objects, landscapes, and sites would represent a significant impact to historical resources. Therefore, future projects would have the potential to result in a substantial adverse effect on historical resources, and impacts would be significant.

#### **4.5.7.2 Topic 2: Archaeological Resources**

Analysis of impacts from future development on known and those-not-yet-found archaeological resources would be required at the project level. Any vegetation clearing/grubbing, grading, trenching, or excavation associated with future development that could expose buried prehistoric or historic-era archaeological resources would represent a significant impact to historical resources. Therefore, future projects would have the potential to result in a substantial adverse effect on historical resources, and impacts would be significant.

#### **4.5.6.3 Topic 3: Human Remains**

Analysis of impacts from future development on human remains would be required at the project level. Any vegetation clearing/grubbing, grading, trenching, or excavation associated with future development that would expose or disturb unknown human remains would represent a significant impact to human remains. Therefore, future projects would have the potential to result in a substantial adverse effect on historical resources, and impacts would be significant.

#### **4.5.7.4 Topic 4: Tribal Cultural Resources**

Analysis of impacts from future development on tribal cultural resources would be required at the project level. Any vegetation clearing/grubbing, grading, trenching, or excavation

associated with future development that would affect tribal cultural resources represent a significant impact to tribal cultural resources. Therefore, future projects would have the potential to result in a substantial adverse effect on tribal cultural resources, and impacts would be significant.

## 4.5.8 Mitigation

The following mitigation measures would reduce impacts to the historic built-environment, archaeological resources, human remains, and tribal cultural resources to less than significant. These mitigation measures identify the process of implementing those recommendations and would be required for future projects with the potential to impact historical and tribal cultural resources.

### 4.5.8.1 Topic 1: Historic Resources

**CUL-1:** Prior to the issuance of any permit for a future development site-specific project that would directly or indirectly affect a building/structure in excess of 50 years of age, the City or a qualified architectural historian shall determine whether the affected building/structure is historically significant. The evaluation shall be based on criteria such as age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the CEQA guidelines. If the evaluation determines that building/structure is not historic, no further evaluation or mitigation would be required. If the building/structure is determined to be historically significant, the preferred mitigation would be to avoid the resource through project redesign. If the resource cannot be avoided, all prudent and feasible measures to minimize or mitigate harm to the resource shall be taken per recommendations of the qualified architectural historian.

### 4.5.8.2 Topic 2: Archaeological Resources

**CUL-2:** Prior to issuance of any permit for a future site-specific project that would potentially have a direct or indirect affect an archaeological resource, the City shall require the following steps be taken to determine: (1) the presence of archaeological resources, and (2) the appropriate mitigation for any significant resources which may be impacted by project development. The following steps would help determine the presence or absence of archaeological resources.

Step 1: An archaeologist shall conduct records and background research at the Eastern Information Center for a list of recorded resources and request a sacred lands file search from the Native American Heritage Commission.

Step 2: After review of this data, a pedestrian survey shall be conducted by a qualified archaeologist.

- Step 3: If through the research and the field survey, archaeological resources are identified, then an evaluation of significance shall be completed by a qualified archaeologist. The evaluation program generally will include excavation to determine depth, extent, integrity, and content of the subsurface cultural material.
- Step 4: The results of the excavation will be evaluated using the Thresholds above in Section 4.5.4.
- Step 5: If an archaeological resource is determined significant and avoidance through project redesign is not feasible, a data recovery and construction monitoring program must be implemented to reduce the impacts the archaeological resource to below a significant level. The data recovery program must be approved by the City.
- Step 6: A final data recovery and/monitoring report shall be completed in accordance with the California Office of Historic Preservation's *Archaeological Resource Management Reports: Recommended Content and Format*. Confidential attachments must be submitted under separate covers. Artifacts collected during the evaluation and data recovery phases must be curated at an appropriate facility consistent with state (California State Historic Resources Commission's Guidelines for Curation of Archaeological Collection 1993) and federal curation standards (36 CFR 79 of the Federal Register) and that allows access to artifact collections.

### 4.5.8.3 Topic 3: Human Remains

- CUL-3:** If human remains are unintentionally disturbed during archaeological excavations or construction activities, implementation of the procedures set forth in PRC Section 5097.98 and California State Health and Safety Code 7050.5 would be implemented in consultation with the MLD as identified by the NAHC. California State Health and Safety Code Section 7050.5 dictates that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined by the County Coroner to be Native American, the NAHC shall be notified within 24 hours. The NAHC shall identify the MLD with whom consultation shall occur to determine in the treatment and disposition of the remains.

### 4.5.8.4 Topic 4: Tribal Cultural Resources

Implementation of CUL-2 and CUL-3, along with AB 52 consultation early during the development review process, would minimize potentially significant impacts on tribal cultural resources.

## **4.5.9 Significance of Impacts after Mitigation**

### **4.5.9.1 Topic 1: Historic Resources**

Implementation of the mitigation measures described above would reduce impacts on historic resources to a level less than significant. However, as no specific development projects have been identified at this time, it is not possible to ensure that every future project could fully mitigate potentially significant impacts. Therefore, impacts to historic resources would be significant and unavoidable at this program level of review.

### **4.5.9.2 Topic 2: Archaeological Resources**

Implementation of the mitigation measures described above would reduce impacts on archaeological resources to a level less than significant. However, as no specific projects have been identified at this time, it is not possible to ensure that every future project could fully mitigate potentially significant impacts. Therefore, impacts to archaeological resources would be significant and unavoidable at this program level of review.

### **4.5.9.3 Topic 3: Human Remains**

Implementation of the mitigation measures described above would reduce impacts on human remains to a level less than significant. However, as no specific projects have been identified at this time, it is not possible to ensure that every future project could fully mitigate potentially significant impacts. Therefore, impacts to human remains would be significant and unavoidable at this program level of review.

### **4.5.9.4 Topic 4: Tribal Cultural Resources**

Implementation of AB 52 consultation in addition to the mitigation measures described above would reduce impacts on tribal cultural resources to a level less than significant. However, as no specific projects have been identified at this time, it is not possible to ensure that every future project could fully mitigate potentially significant impacts. Therefore, impacts to tribal cultural resources would be significant and unavoidable at this program level of review.

## 4.6 Energy

This section evaluates potential impacts related to energy conservation due to implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the entire city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area. This energy analysis evaluates potential effects associated with the project and cumulative increases of transportation-related fuel use and building-related energy use (electricity and natural gas) resulting from buildout of the 2021 GPU land use designations. In accordance with the California Environmental Quality Act (CEQA), the project is evaluated for its potential to result in wasteful, inefficient, or unnecessary consumption of energy resources or to conflict with applicable plans for renewable energy and energy efficiency.

### 4.6.1 Existing Conditions

#### 4.6.1.1 Utility Provider

Southern California Edison (SCE) is the main electricity provider in the Planning Area. SCE is regulated by the California Public Utilities Commission (CPUC), which is responsible for making sure that California utilities' customers have safe and reliable utility service. The city is also served by Moreno Valley Utility (MVU), and since incorporation, is in charge of providing electric power to new development, also known as greenfields.

Senate Bill 1078 (SB 1078) established the California Renewables Portfolio Standard (RPS) Program, which requires SCE and other statewide energy utility providers to achieve renewable energy goals by certain milestone dates (see Section 4.6.2.1). Table 4.6-1 summarizes the SCE and MVU power mix as of 2019. As shown, SCE's default power mix included 35 percent of its energy from renewable resources in 2019, and SCE offered "green rate" enrollment options for customers who wanted to purchase additional renewable energy (SCE 2020). MVU's default power mix included 33 percent of its energy from renewable resources.



Energy Resources	SCE			MVU	2019
	Default Power Mix	Green Rate (50% Option)	Green Rate (100% Option)	Default Power Mix	California Power Mix
Eligible Renewable	35.1%	67.5%	100.0%	33.4%	31.7%
<i>Biomass &amp; Biowaste</i>	0.6%	0.3%	0.0%	0.0%	2.4%
<i>Geothermal</i>	5.9%	2.9%	0.0%	9.3%	4.8%
<i>Eligible Hydroelectric</i>	1.0%	0.5%	0.0%	6.8%	2.0%
<i>Solar</i>	16.0%	58.0%	100.0%	9.5%	12.3%
<i>Wind</i>	11.5%	5.7%	0.0%	7.8%	10.2%
Coal	0.0%	0.0%	0.0%	0.0%	3.0%
Large Hydroelectric	7.9%	4.0%	0.0%	0.0%	14.6%
Natural Gas	16.1%	8.1%	0.0%	0.0%	34.2%
Nuclear	8.2%	4.1%	0.0%	0.0%	9.0%
Other	0.1%	0.1%	0.0%	0.0%	0.2%
Unspecified Sources*	32.6%	16.3%	0.0%	0.0%	7.3%

SOURCE: SCE 2020, City of Moreno Valley 2020b.  
 \*"Unspecified Sources" means electricity from transactions that are not traceable to specific generation sources.

## 4.6.2 Applicable Regulatory Requirements

### 4.6.2.1 State Regulations

#### a. California Energy Efficiency Action Plan

In September 2008, the CPUC adopted the Long Term Energy Efficiency Strategic Plan, which established the first integrated framework of goals and strategies for saving energy, covering government, utility, and private sector actions. Assembly Bill (AB) 758 subsequently established a requirement for regular updates to the plan in 2010, and SB 350 identified a plan goal in 2015 of achieving a doubling of statewide energy efficiency savings in electricity and natural gas final end uses of retail customers by January 1, 2030 (relative to 2015 base year). Since 2008, the plan has been implemented through focused action plans such as the Zero Net Energy Commercial Building Action Plan in June 2011, the Research and Technology Action Plan in August 2013, the Lighting Action Plan in November 2013, the Codes and Standards Action Plan in March 2014, and the New Residential Zero Net Energy Action Plan in June 2015.

The first comprehensive update to the plan, the 2019 California Energy Efficiency Action Plan, was adopted in November 2019 (CEC 2019). In response to new direction from legislature, the focus of the new plan has been expanded. Rather than being focused on traditional end-use energy efficiency, the new plan also includes measures aimed at building decarbonization.

#### b. Sustainable Communities Strategy

SB 375, the 2008 Sustainable Communities and Climate Protection Act, provides for a new planning process that coordinates land use planning, regional transportation plans, and

funding priorities to help California meet the greenhouse gas (GHG) reduction goals established in AB 32. SB 375 requires regional transportation plans developed by metropolitan planning organizations (MPOs) to incorporate a Sustainable Communities Strategy in their plans. The goal of the Sustainable Communities Strategy is to reduce regional vehicle miles traveled (VMT) through land use planning and consequent transportation patterns. SB 375 also includes provisions for streamlined CEQA review for some infill projects, such as transit-oriented development.

### **c. Renewables Portfolio Standard**

The RPS promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020 (referred to as the "Initial RPS"), the goal has been accelerated and increased by Executive Orders (EOs) S-14-08 and S-21-09 to a goal of 33 percent by 2020. In April 2011, SB 2 (1X) codified California's 33 percent RPS goal. SB 350 (2015) increased California's renewable energy mix goal to 50 percent by year 2030. SB 100 (2018) further increased the standard set by SB 350 establishing the RPS goal of 44 percent by the end of 2024, 52 percent by the end of 2027, and 60 percent by 2030. This bill also says that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045.

### **d. California Code of Regulations, Title 24 – California Building Code**

The California Code of Regulations (CCR), Title 24, is referred to as the California Building Code (CBC). It consists of a compilation of several distinct standards and codes related to building construction, including, but not limited to, plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility.

#### ***Title 24, Part 6 – Energy Efficiency Standards***

The CCR, Title 24, Part 6 is the Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Energy Code is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission (CEC).

The current version of the Energy Code, known as the 2019 Title 24, or the 2016 Energy Code, became effective January 1, 2020. The 2019 Energy Code includes provisions for smart residential photovoltaic (PV) systems, updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and nonresidential lighting requirements. The 2019 Energy Code

aims to reduce energy use in new homes by requiring that all new homes include individual or community solar PV systems or community shared battery storage system that achieves equivalent time-dependent value energy use reduction. Accounting for solar PV requirements, the CEC's preliminary estimates indicate that homes built consistent with the 2019 Energy Code will result in 53 percent less energy use than those built under previous 2016 standards.

### ***Title 24, Part 11 – California Green Building Standards Code***

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 CBC). The 2019 CALGreen institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements. The mandatory standards require:

- Outdoor water use requirements as outlined in local water-efficient landscaping ordinances or current Model Water Efficient Landscape Ordinance standards, whichever is more stringent;
- Requirements for water conserving plumbing fixtures and fittings;
- 65 percent construction/demolition waste diverted from landfills;
- Infrastructure requirements for electric vehicle charging stations;
- Mandatory inspections of energy systems to ensure optimal working efficiency; and
- Requirements for low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards.

#### **4.6.2.2 Regional Regulations**

The Southern California Association of Governments (SCAG) is the MPO for Imperial County, Los Angeles County, Orange County, Riverside County, San Bernardino County, Ventura County, and the 191 cities located within these counties. Moreno Valley is within the Western Riverside Council of Governments' (WRCOG) subregion of SCAG, which encompasses the western 18 cities in Riverside County.

##### **a. Sustainable Communities Strategy**

SCAG is responsible for developing long-range regional plans and strategies for efficient multi-modal transportation. As the MPO and Regional Transportation Planning Agency, SCAG supports freeway construction projects, regional and local road improvements, train and bus transportation, railroad crossings, call boxes, ridesharing, congestion management efforts and long-term planning studies. Following the California ARB Board Hearing on

March 22, 2018, the regional vehicle-use reduction targets from automobiles and light duty trucks for SCAG are:

- 8 percent reduction from the 2005 per capita amount by 2020
- 19 percent reduction from the 2005 per capita amount by 2035

To achieve regional vehicle-use emission reduction targets, SCAG initially developed and adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in April 2016, and in September 2020 adopted Connect SoCal, the updated 2020-2045 RTP/SCS (SCAG 2020). Connect SoCal is a planning document for the region that builds upon and expands land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern.

## **b. Western Riverside Council of Government**

The WRGOC is a joint power agency intended to coordinate regional planning efforts. WRCOG adopted its Economic Development & Sustainability Framework in December 2012 and a Subregional Climate Action Plan (Subregional CAP) in September 2014 (WRCOG 2012 and 2014). The Framework identified measures that its member jurisdictions could implement to improve transportation planning, energy efficiency, and reduce GHG emissions; established goals to inform local action; and defined indicators for member jurisdictions to gauge measure effectiveness. The subsequent Subregional CAP recommends measures; many of these measures require joint implementation with support from both WRCOG staff and local “CAP coordinators” in member jurisdictions.

### **4.6.2.3 Local Regulations**

#### **Energy Efficiency and Climate Action Strategy**

The City adopted its Energy Efficiency and Climate Action Strategy in October 2012 (Moreno Valley 2012). The strategy includes a comprehensive list of measures for the City to consider that are intended to reduce energy consumption, reduce water use, encourage recycling and waste diversion, promote use of alternative fuel vehicles, facilitate the use of renewable energy, or otherwise reduce GHG emissions. Examples of policy measures intended to reduce energy use support include the following:

- **R2-T1:** Land Use Based Trips and VMT Reduction Policies. Encourage the development of Transit Priority Projects along High Quality Transit Corridors identified in the SCAG Sustainable Communities Plan, to allow a reduction in VMT.
- **R2-T3:** Employment-Based Trip Reductions. Require a Transportation Demand Management (TDM) program for new development to reduce automobile travel by encouraging ride-sharing, carpooling, and alternative modes of transportation.
- **R2-E2:** New Construction Residential Renewable Energy. Facilitate the use of renewable energy (such as solar (PV) panels or small wind turbines) for new

residential developments. Alternative approach would be the purchase of renewable energy resources off-site.

- **R2-E5:** New Construction Commercial Energy Efficiency Requirements. Require energy efficient design for all new commercial buildings to be 10 percent beyond the current Title 24 standards. (Reach Code)
- **R3-E1:** Energy Efficient Development, and Renewable Energy Deployment Facilitation and Streamlining. Updating of codes and zoning requirements and guidelines to further implement green building practices. This could include incentives for energy efficient projects.
- **R3-L2:** Heat Island Plan. Develop measures that address “heat islands.” Potential measures include using strategically placed shade trees, using paving materials with a Solar Reflective Index of at least 29, an open grid pavement system, or covered parking.

### 4.6.3 Methodologies for Determining Impacts

The project does not specifically address any particular development project(s); therefore, impacts to energy resources are addressed generally, based on projected buildout of the project. Energy resources would be consumed during construction of future development and redevelopment under the project. Energy would also be consumed to provide operational lighting, heating, cooling, and transportation for future development. Building-related energy use under existing conditions, as well as buildout of the existing 2006 General Plan and the project were obtained from the GHG inventory and projections prepared in conjunction with the CAP. Transportation-related energy use was analyzed by comparing VMT associated with buildout of the project to buildout of the existing 2006 General Plan.

### 4.6.4 Basis for Determining Significance

Thresholds used to evaluate impacts to energy resources are based on applicable criteria in the CEQA Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact would occur if the project would:

- 1) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- 2) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

## 4.6.5 Impact Analysis

### 4.6.5.1 Topic 1: Energy Consumption

*Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Implementation of the project would have the potential to impact energy supply due to the development that is anticipated to occur in response to projected population growth in the Planning Area. Depending on the types of future uses, impacts would need to be addressed in detail at the time specific projects are proposed. Consistent with CEQA Guidelines, impacts to energy resources could be significant if implementation of the project would develop land uses and patterns that would cause the wasteful, inefficient, and unnecessary consumption of energy or the construction of new or retrofitted buildings that would have excessive energy requirements for daily operation. To better analyze the environmental effects associated with the project, energy use is evaluated in three distinct categories:

- a) Equipment energy use from construction of future development and redevelopment implemented under the project;
- b) Transportation energy use from people traveling to, from, and within the Planning Area; and
- c) Building energy use within the Planning Area after buildout.

#### a. Construction-Related Energy Use

During construction, energy use would occur in two general categories: fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. At the program level, it is too speculative to quantify the construction-related energy consumption of future development, either in total or by fuel type. Although the exact details of future development are not known at this time, there are no known conditions in the Planning Area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical rates. It should also be noted that all construction equipment is subject to the CARB In-Use Off-Road Diesel-Fueled Fleets Regulation. This regulation, which applies to all off-road diesel vehicles 25 horsepower or greater, limits unnecessary idling to 5 minutes, requires all construction fleets to be labeled and reported to CARB, bans Tier 0 equipment and phases out Tier 1 and 2 equipment (thereby replacing fleets with cleaner equipment), and requires that fleets comply with Best Available Control Technology requirements, which would increase construction equipment fuel efficiency. Therefore, future development would not result in the use of excessive amounts of fuel or other forms of energy during construction of future projects, and impacts would be less than significant.

## **b. Transportation-Related Energy Use**

Buildout of the project would consume energy associated transportation uses. Trips by individuals traveling to, from, and within the Planning Area would largely rely on passenger vehicles or public transit. Passenger vehicles would be mostly powered by gasoline, with some fueled by diesel or electricity. Public transit would be powered by diesel or natural gas, and could potentially be fueled by electricity. Additionally, the City experiences higher volumes of heavy truck traffic which is generally powered by diesel. In 2020, CARB adopted the Advanced Clean Trucks Regulation which requires manufacturers to sell zero-emission trucks as an increasing percentage of their annual state sales starting in 2035. As a result, the number of diesel-fueled heavy trucks will decrease over time.

The Planning Area generates 3,144,986 VMT in the existing condition, and buildout of the existing 2006 General Plan would generate 4,566,084 VMT (Fehr & Peers 2021). In comparison, buildout of the project would generate 4,524,038 VMT, which would be less than buildout of the existing 2006 General Plan. The project would achieve this reduction in VMT by primarily focusing future development and redevelopment within the proposed Concept Areas, which would reduce reliance on vehicular travel compared to the existing 2006 General Plan. Therefore, the project would generate less VMT compared to buildout of the existing 2006 General Plan.

Additionally, the Planning Area is currently served by eight local bus routes (Riverside Transit Agency Routes 11, 16, 18, 19, 19a, 20, 31, and 41), and the Metrolink line is located at the city's western boundary. The 2021 GPU Transportation Element provides key goals to increase the use of public transit, improve traffic congestion, and enhance the range of transportation options in the city. Implementation of these key goals would serve to further reduce VMT below the 4,524,038 VMT estimated for buildout of the proposed 2021 GPU land use plan. Therefore, the project would not create a land use pattern that would result in a wasteful, inefficient, or unnecessary use of transportation-related energy, and impacts would be less than significant.

## **c. Building-Related Energy Use**

As future development within the city is implemented, new or renovated buildings would be required to use electricity and natural gas to run various appliances and equipment, including space and water heaters, air conditioners, ventilation equipment, lights, and numerous other devices. Generally, electricity use is higher in the warmer months due to increased air conditioning needs, and natural gas use is highest when the weather is colder as a result of high heating demand. Residential uses would likely see the most energy use in the evening as people return from work, while most nonresidential facilities would have high energy use during normal business hours and lower levels at other times.

Existing and future residential and non-residential energy use was calculated as a part of the GHG inventory and projections prepared in conjunction with the CAP. Existing energy consumption data for residential, commercial, and industrial sectors, as well as public facilities (public services, public lighting, and street lights) were obtained from SCE, Moreno

Valley Utility, and the Southern California Gas Company. Residential, commercial, and industrial energy consumption was projected to year 2040 for both the existing 2006 General Plan and the proposed 2021 GPU land use plan. These projections also considered population forecasts and applied energy savings associated with implementation of Title 24 standards in newly constructed buildings. Energy consumption from the public sector, including public lighting, were calculated assuming that the 2019 program to retrofit street lights to LED will reduce emissions from public lighting by 68 percent. Table 4.6-2 summarizes the projected energy use within the Planning Area, buildout of the existing 2006 General Plan, and the proposed 2021 GPU land use plan.

Sector	Existing (2018)		Existing 2006 General Plan (2040)		Proposed 2021 GPU (2040)	
	Electricity (kWh)	Natural Gas (Therms)	Electricity (kWh)	Natural Gas (Therms)	Electricity (kWh)	Natural Gas (Therms)
Residential	391,975,510	21,934,767	432,886,344	29,732,577	457,231,019	457,231,019
Commercial	302,328,359	5,885,682	549,184,393	10,784,918	478,239,443	9,376,637
Industrial	99,775,374	41,302	1,025,747,391	410,716	754,522,614	305,384
Public Services, Public Lighting, Street Lights	9,646,466	--	5,639,176	--	5,639,176	--
<b>TOTAL</b>	<b>803,725,709</b>	<b>27,861,751</b>	<b>2,013,457,303</b>	<b>40,928,210</b>	<b>1,695,632,252</b>	<b>466,913,039</b>

SOURCE: Dyett & Bhatia 2020c.

As shown in Table 4.6-2 above, buildout of the project would result in a decrease in electricity and natural gas usage compared to buildout of the existing 2006 General Plan. Future development implemented under the project would be required at a minimum to meet the mandatory energy requirements of CALGreen and the California Energy Code (Title 24, Part 6 of the CCR) in effect at the time of development, and would benefit from the efficiencies associated with these regulations as they relate to building heating, ventilating, and air conditioning mechanical systems, water heating systems, and lighting. Additionally, rebate and incentive programs that promote the installation and use of energy-efficient plug-in appliances and lighting would be available as incentives for future development.

In addition to the energy efficiencies that would be realized from compliance with current CALGreen and Title 24 standards in new developments, the 2021 GPU aims to promote energy conservation through voluntary programs that provide energy-efficiency audits, retrofits, rebates, and other financing programs and incentives. Additionally, the CAP includes a number GHG reduction goals related to energy use and energy conservation (see Section 4.8). Therefore, the project would not create a land use pattern that would result in a wasteful, inefficient, or unnecessary use of building-related energy, and impacts would be less than significant.



### **4.6.5.2 Topic 2: Renewable Energy or Energy Efficiency**

*Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

The applicable state plans that address renewable energy and energy efficiency are CALGreen, the California Energy Code, and RPS. As discussed under Section 4.6.5.1 above, future development implemented under the project would be required at a minimum to meet the mandatory energy requirements of CALGreen and the California Energy Code in effect at the time of development. SCE and MVU, the electricity providers for the Planning Area, are currently meeting RPS goals and are on track to achieve future RPS goals. Thus, electricity provided to the Planning Area is increasingly coming from renewable sources. Implementation of the project would not interfere with SCE's and MVU's progress towards achieving RPS goals. Additionally, as discussed in Section 4.6.5.1, buildout of the project would result in less VMT and less building energy consumption compared to buildout of the existing 2006 General Plan. Therefore, the project would not conflict with or obstruct implementation of CALGreen and the California Energy Code, or with SCE's and MVU's implementation of RPS, and impacts would be less than significant.

## **4.6.6 Cumulative Analysis**

Future development within the Planning Area would generate additional energy demand. However, as new development and redevelopment occurs, buildings would be required to comply with the California Energy Code, Title 24 requirements in place at the time of building permit issuance. Each update to the Energy Code has historically incorporated more stringent energy efficiency requirements, and the state is headed towards a net-zero energy goal for new development. Therefore, redevelopment would replace older, less energy efficient buildings with more energy efficient buildings that meet current energy efficiency standards. Furthermore, the City's CAP includes additional energy efficiency requirements that would be required of future discretionary developments, and all development is required to comply with Title 24 requirements. Additionally, by changing land use designations and focusing development in Concept Areas, the project would reduce VMT when compared to buildout of the existing 2006 General Plan. Therefore, the project would not contribute to cumulative impacts related to energy consumption.

## **4.6.7 Significance of Impacts before Mitigation**

### **4.6.7.1 Topic 1: Energy Consumption**

Energy conservation measures required by applicable energy conservation regulations (e.g., CALGreen, Title 24) and energy conservation policies included in the proposed 2021 GPU, and the CAP would support the minimization of energy consumption from operations associated with future development. VMT and building energy use associated with buildout of the project would be less than the VMT and building energy use associated with buildout of the existing 2006 General Plan. Therefore, the project would not result in a wasteful,

inefficient or unnecessary consumption of energy resources, and impacts would be less than significant.

#### **4.6.7.2 Topic 2: Renewable Energy or Energy Efficiency**

Future development allowed under the project would implement applicable regulation that would ensure development would be energy efficient. Therefore, the project would not conflict with or obstruct implementation of CALGreen and the California Energy Code, or with SCE and MVU's implementation of RPS, and impacts would be less than significant.

### **4.6.8 Mitigation**

#### **4.6.8.1 Topic 1: Energy Consumption**

Impacts would be less than significant. No mitigation is required.

#### **4.6.8.2 Topic 2: Renewable Energy or Energy Efficiency**

Impacts would be less than significant. No mitigation is required.

### **4.6.9 Significance of Impacts after Mitigation**

#### **4.6.9.1 Topic 1: Energy Consumption**

Impacts would be less than significant. No mitigation is required.

#### **4.6.9.2 Topic 2: Renewable Energy or Energy Efficiency**

Impacts would be less than significant. No mitigation is required.

## 4.7 Geology/Soils

This section analyzes potentially significant impacts related to geology and soils that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan. The analysis area covers the entire city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area. This analysis relies on secondary source information including but not limited to soils data from the California Geological Survey and United States Geological Survey fault and geologic mapping.

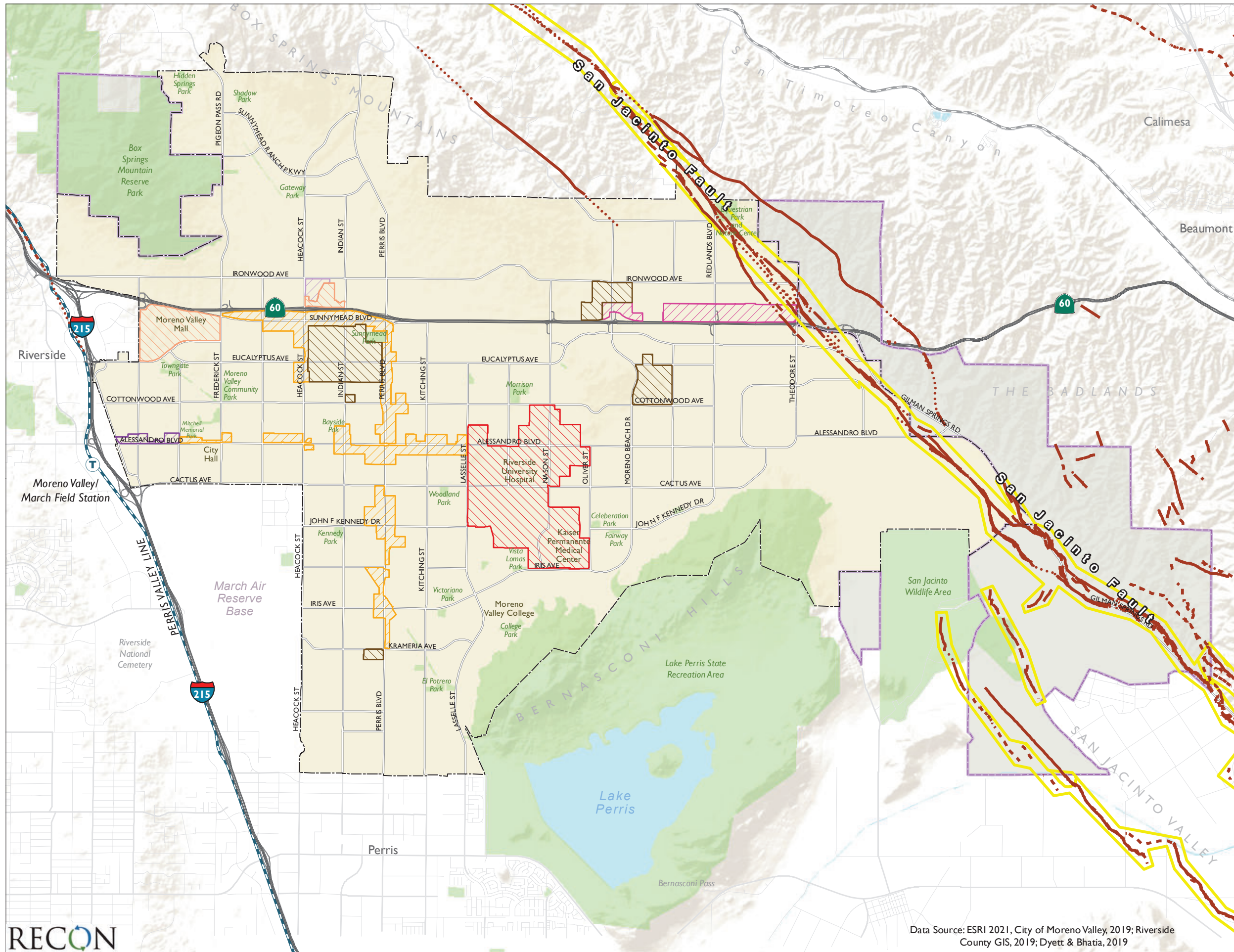
### 4.7.1 Existing Conditions

The city lies in the northern portion of the Peninsular Ranges Physiographic Province of California, at the eastern margin of a structural block known as the Perris Block. This structural block is a mass of granitic rock, generally bound by the San Jacinto Fault, the Elsinore Fault, and the Santa Ana River. The Perris Block has been vertically uplifted several thousand feet. The granitic mountain areas of the Perris Block, including the Box Springs Mountains and the Mount Russell area, are underlain primarily by quartz diorite bedrock. The area is characterized by many rock outcrops and large weathered boulders.

The geologic and seismic setting of Planning Area is dominated by the proximity of the Holocene-active San Jacinto Fault, which traverses the northeastern and eastern city limits (Figure 4.7-1). The potential for major earthquake damage throughout the Planning Area is from activity along this fault zone (Moreno Valley 2006a).

#### 4.7.1.1 Surface Rupture

The Planning Area is located within the seismically active southern California region. Earthquakes resulting from fault movement can result in surface rupture along an active or potentially active fault. The State of California has identified faults that represent a hazard of surface rupture as Alquist-Priolo earthquake fault zones. As shown in Figure 4.7-1, the San Jacinto fault zone, which has been categorized as an Alquist-Priolo earthquake fault zone, traverses the northeastern and eastern boundary of the Planning Area. The San Jacinto fault zone is composed of several parallel faults that together constitute the zone. There are three branches of the San Jacinto Fault in the southeast corner of the study area. The western branch is sometimes referred to as the Casa Loma Fault; the eastern branch, the Claremont Fault. The Farm Road Fault was identified in 1992 in the southeastern portion of the study area. The Casa Loma Fault within the city limits is not identified as an Alquist-Priolo earthquake fault zone. Insufficient information is available to determine if the fault is active (Moreno Valley 2006a).



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- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes
- Faults**
- Certain
- Approximate Location
- Concealed
- Alquist Priolo Fault Zones



**FIGURE 4.7-1**  
Fault Zones

### 4.7.1.2 Ground Shaking

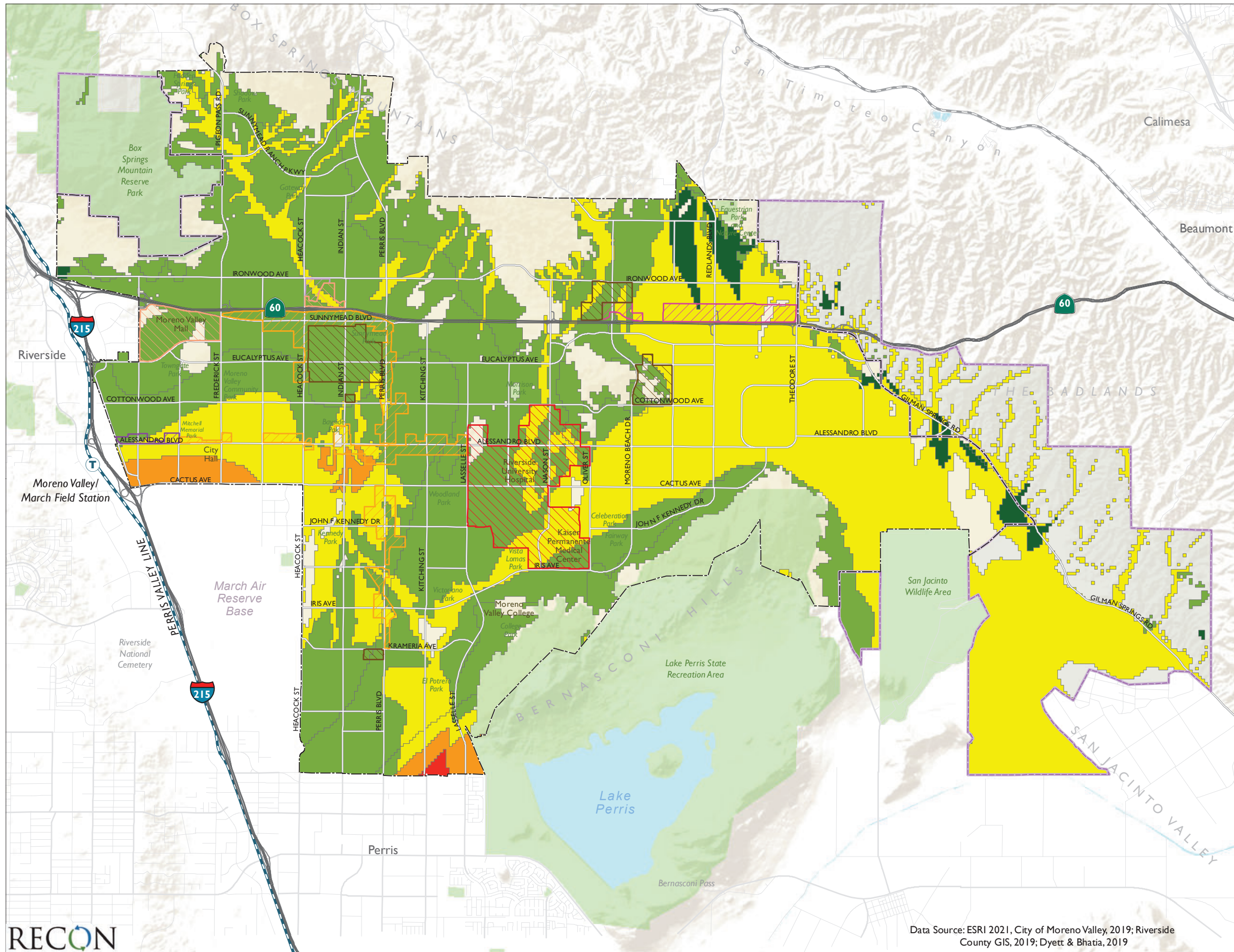
Ground shaking is the effect of surface motion generated by an earthquake that results in the vast majority of damage during seismic events. Several factors control how ground motion interacts with structures, making the hazard of ground shaking difficult to predict. Seismic waves propagating through the Earth's crust are responsible for the ground vibrations normally felt during an earthquake. Structures throughout the Planning Area could be affected by ground shaking during a seismic event associated with the San Jacinto fault zone. Additionally, seismic events associated with the active San Andreas Fault located approximately 15 miles northeast and the active Elsinore Fault located approximately 17 miles southwest could also generate ground shaking within the Planning Area.

### 4.7.1.3 Liquefaction

Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high -intensity ground shaking. Liquefaction occurs when three general conditions exist: (1) shallow groundwater; (2) low -density non-cohesive (granular) soils; and (3) high -intensity ground motion. Liquefaction is typified by a buildup of pore-water pressure in the affected soil layer to a point where a total loss of shear strength occurs, causing the soil to behave as a liquid. Studies indicate that saturated, loose to medium dense, near surface cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential.

Figure 4.7-2 presents liquefaction susceptibility classifications throughout the Planning Area, and Table 4.7-1 presents the acreage of land within the Planning Area designated under each liquefaction susceptibility classification. As shown in Figure 4.7-2, the majority of the Planning Area is classified as having low or moderate potential for liquefaction susceptibility. Small amounts of land within the western and southern portion of the Planning Area are classified as having high potential for liquefaction susceptibility, and a small amount of land along the southern border is classified as having very high potential for liquefaction susceptibility. However, geotechnical analysis completed for recent site-specific projects located within the area identified as having a high liquefaction potential north of Cactus Avenue did not identify any soils within the proposed footprints with high potential for liquefaction.

Row Labels	Acres	Percent
Very High	38.01	0.09%
High	625.44	1.46%
Moderate	14,204.81	33.10%
Low	16,026.75	37.34%
Very low	649.33	1.51%
No Rating	11,372.66	26.50%
<b>TOTAL</b>	<b>42,917.00</b>	<b>100.00%</b>
SOURCE: Riverside County GIS 2019.		



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- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes
- Liquefaction Susceptibility**
- Very low
- Low
- Moderate
- High
- Very High



**FIGURE 4.7-2**  
Liquefaction

#### 4.7.1.4 Soil Stability and Landslides

Five soil associations occur within the Planning Area. The five soil types are: Monserate Arlington-Exeter; Hanford-Tujunga-Greenfield; Cieneba-Rock Land-Fallbrook; San Emigdio-Grangeville-Metz; and the Badlands-San Timoteo. Each is briefly described below.

**Monserate-Arlington-Exeter.** This soil association is found adjacent to and within the eastern half of the March Air Reserve Base. It consists of well-drained soils that developed in alluvium from predominantly granitic materials. Soil stability is considered fair to good with minimal erosion potential.

**Hanford-Tujunga-Greenfield.** This soil association is found within the central portion of the study area, generally extending northeast to southeast of March Air Reserve Base. It consists of well drained to somewhat excessively drained soils, developed in granitic alluvium. Soil stability is considered poor to fair with significant erosion potential.

**Cieneba-Rock Land-Fallbrook.** This soil association is found on uplands located in the Box Springs Mountains area, and extends east to Reche Canyon, and into the Mount Russell area. It consists of somewhat excessively drained soils on undulating steep slopes. Soil stability is generally considered fair with marginal potential for erosion.

**San Emigdio-Grangeville-Metz.** This soil association is found along the western side of Gilman Springs Road. It consists of well-drained soils on nearly level to steep slopes. Soil stability is considered poor to fair with significant potential for erosion.

**Badlands-San Timoteo.** This soil association is found along the northern portion of Gilman Springs Road into the Badlands region. It consists of well-drained soils on steep to very steep slopes. The soils are variable consisting of soft sandstone, siltstone, and beds of gravel. Soil stability is considered poor to fair with significant potential for erosion.

The primary factors that determine an area's susceptibility to slope instability are the underlying geologic and soils characteristics. As described, some of these soils have poor to fair stability and are considered to be potentially expansive. Expansive soils are prone to collapse and are commonly associated with wind-laid sands and silts, and alluvial fan and mudflow sediments deposited during flash floods. For example, the abundant shales and siltstones underlying the Badlands are highly porous and do not hold together well when wet, which can lead to slope instability and landslides. Secondary factors contributing to slope instability and landslides include rainfall and earthquakes.

Landslides occur when masses of rock, earth, or debris move down a slope, including rock falls, deep failure of slopes, and shallow debris flows. Landslides are influenced by human activities such as grading and other construction activities, irrigation of slopes, mining activity, and by natural factors such as precipitation, geology/soil types, surface/subsurface flow of water, and topography. Frequently, they may be triggered by other hazards such as floods and earthquakes. The majority of the city is relatively flat and has been assigned a landslide susceptibility class of III (Low Risk) by the California Geological Survey

(Figure 4.7-3). However, some areas within the northern, northeastern, and southeastern portions of the Planning Area have been assigned landslide susceptibility class ranging from V (Moderate Risk) to X (High Risk). Some areas within the central portion of the city have also been assigned a landslide susceptibility class ranging from V (Moderate Risk) to X (High Risk).

### **4.7.1.5 Paleontological Resources**

Figure 4.7-4 presents the paleontological sensitive ratings for soils located within the Planning Area. Sensitivity ratings are based on the California Department of Transportation Standard Environmental Reference guidelines for paleontology, which classifies geologic units and formations as having high, low, or no potential for paleontological resources (Caltrans 2017). Sensitivity is also based on depth of excavation. Some geologic units and formations have low potential at a depth of excavation ranging from 0 to 10 feet, but have high sensitivity when the depth of excavation exceeds 10 feet.

## **4.7.2 Applicable Regulatory Requirements**

### **4.7.2.1 State Regulations**

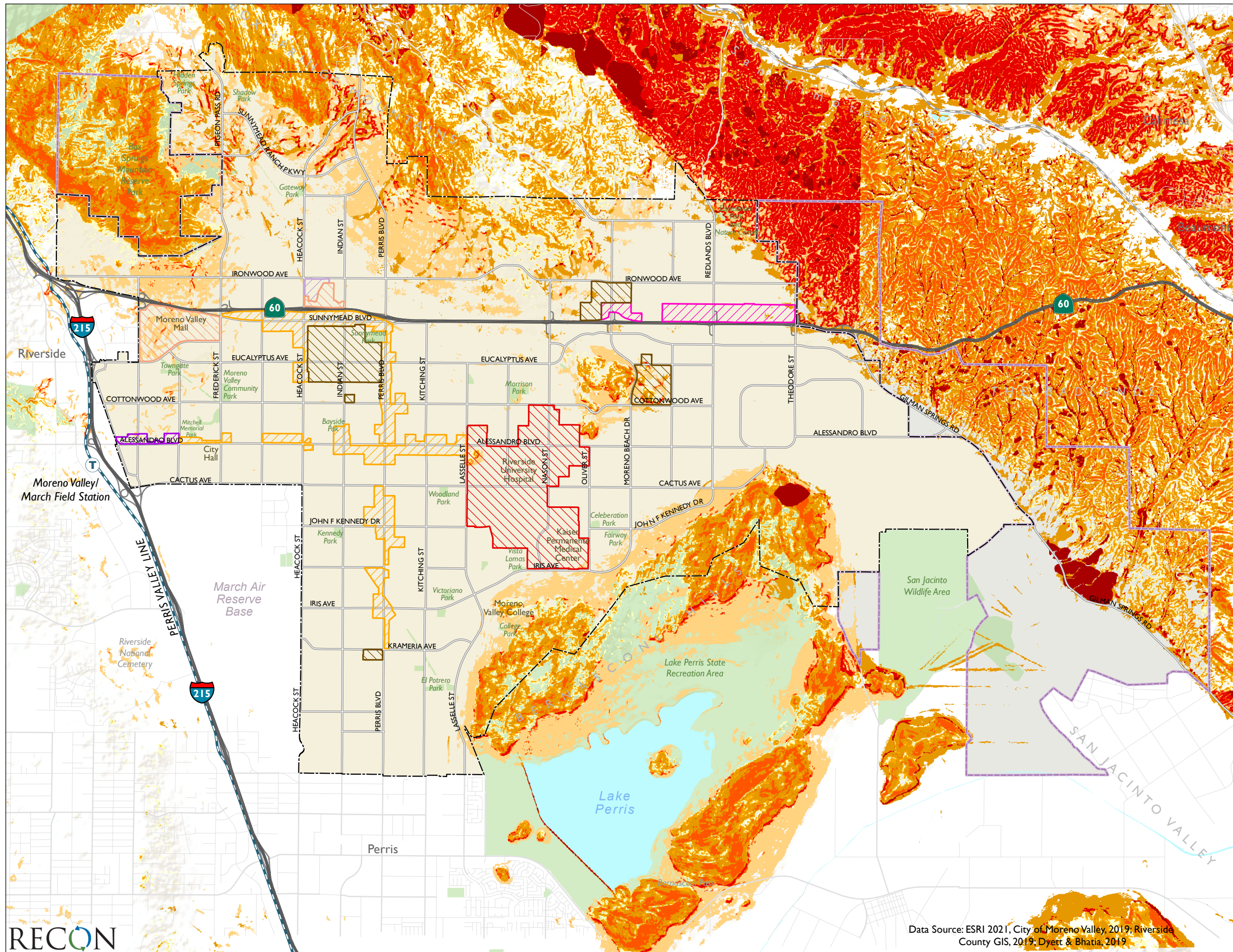
#### **a. Earthquake Fault Zoning Act (Alquist-Priolo Act)**

The State of California Alquist-Priolo Earthquake Fault Zoning Act (1972) was established to mitigate the hazard of surface faulting to structures for human occupancy. Pursuant to the act, the state geologist has established regulatory zones (known as earthquake fault zones) around surface traces of active faults. These have been mapped for affected cities, including Moreno Valley. Application for a development permit for any project within a delineated earthquake fault zone shall be accompanied by a geologic report, prepared by a geologist registered in the state of California, that is directed to the problem of potential surface fault displacement through a project site.

#### **b. Seismic Hazard Mapping Act**

The Seismic Hazard Mapping Act (SHMA) was adopted by the state in 1990 to protect the public from the effects of nonsurface fault rupture earthquake hazards, including strong ground shaking, liquefaction, seismically induced landslides, ground amplification or other ground failure caused by earthquakes. The goal of the act is to minimize loss of life and property by identifying and mitigating seismic hazards. The California Geological Survey (CGS) is the primary agency responsible for the implementation of the SHMA. The CGS prepares maps identifying seismic hazard zones and provides them to local governments, which include areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. SHMA requires responsible agencies to only approve projects within these zones following a site-specific investigation to determine if the hazard is present, and if so, the inclusion of appropriate mitigation(s). In addition, the SHMA requires real estate sellers and agents at the time of sale to disclose whether a property is within one of the designated seismic hazard zones.



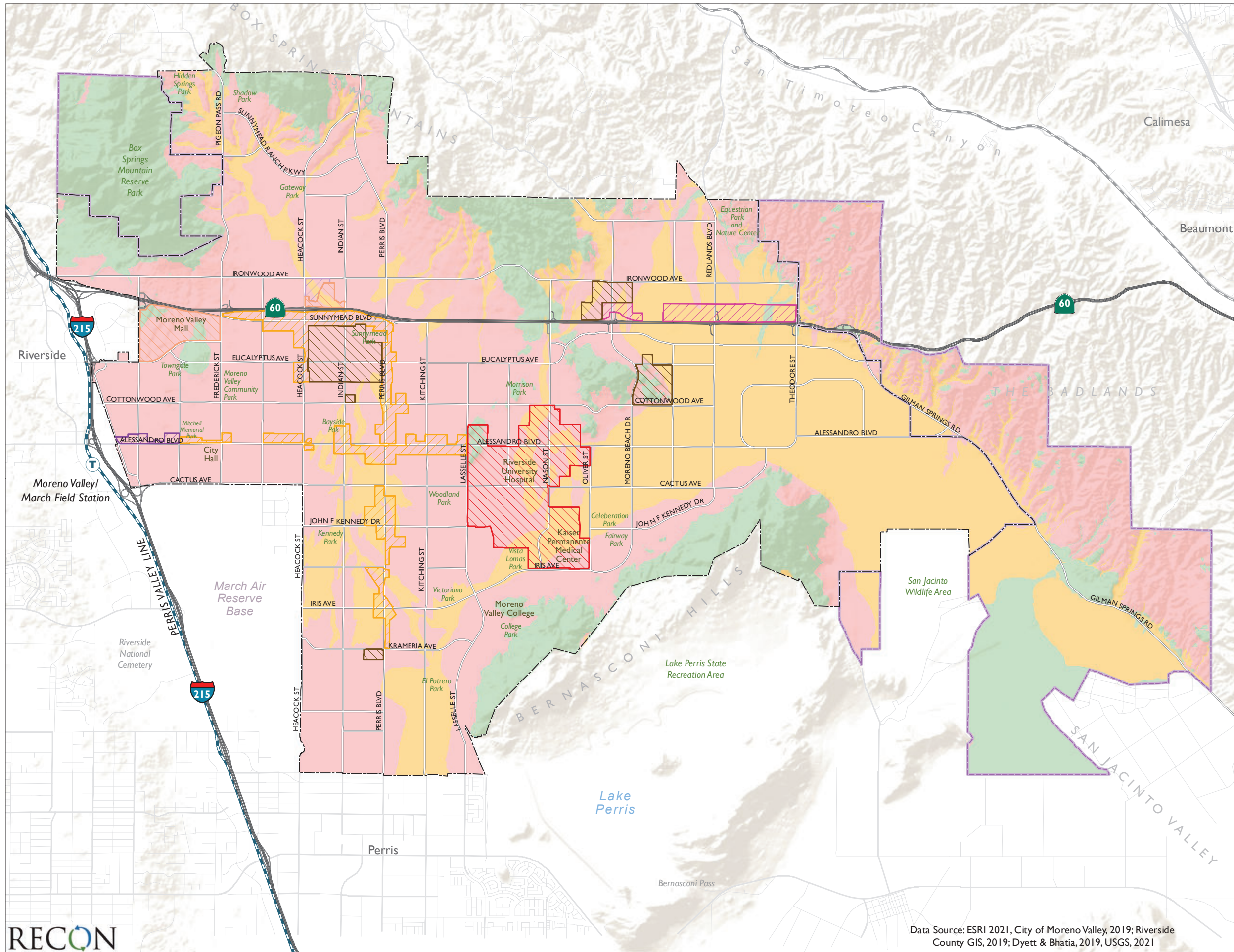


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  - Business Park/Light Industrial
  - Business Flex
- Residential**
  - Residential Density Changes
- Landslide Susceptibility Classes**  
(Source: California Geological Survey)
- 0
- III
- V
- VI
- VII
- VIII
- IX
- X



**FIGURE 4.7-3**  
Landslides

Data Source: ESRI 2021, City of Moreno Valley, 2019; Riverside County GIS, 2019; Dyett & Bhatia, 2019



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- Business Flex
- Residential**
- Residential Density Changes
- Paleontological Sensitivity**
- No
- Low: 0 to 10 ft Below the Surface
- High: Deeper than 10 ft
- High



**FIGURE 4-7.4**  
Paleontological Sensitivity

### **c. California Building Standards Code (Title 24)**

Title 24 of the California Code of Regulations (CCR) provides state regulations that govern the design and construction of buildings, associated facilities, and equipment. These regulations are also known as building standards (reference California Health and Safety Code § 18909). Cities and counties are required by state law to enforce CCR Title 24, and may adopt ordinances making more restrictive requirements than provided by CCR Title 24 due to local climatic, geological, or topographical conditions.

#### **4.7.2.2 Local Regulations**

##### **a. Municipal Code**

Title 8, Chapter 8.21 Grading Regulations of the Municipal Code contains requirements that address potential geological hazards associated with new development. Municipal Code Section 8.21.050 (Grading Permit Requirements) specifies that a geotechnical report is required for all grading projects unless otherwise waived by the city engineer. Recommendations included in the reports and approved by the city engineer, shall be incorporated into the grading plans and specifications. A preliminary soil report, preliminary engineering geology report and/or seismicity report may be required depending on site specific conditions. Engineering geologic reports are required for all developments on hillside sites where geologic conditions are considered to have a substantial effect on existing and/or future site stability. The required reports must provide specific recommendations to facilitate a safe and stable development.

##### **b. Local Hazard Mitigation Plan**

The City developed the Local Hazard Mitigation Plan (LHMP), most recently updated in May 2017, to identify the hazards, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term natural or man-made hazard risks to human life and property for the city and its residents. The goals of the LHMP are to:

1. Protect life, property, and the environment;
2. Provide public awareness;
3. Protect the continuity of government; and
4. Improve emergency management, preparedness, collaboration and outreach.

The LHMP identifies local faults that may generate earthquakes and identifies potential vulnerabilities within the city that could be adversely affected by seismic events. The LHMP also identifies a mitigation strategy for reducing losses associated with seismic events.

Local fault mapping presented in the LHMP is consistent with the fault mapping presented in Figure 4.7-1. The LHMP states that the San Jacinto fault zone, which traverses the northeastern boundary of the Planning Area, is considered one of the more seismically active fault zones in southern California and has the potential to host a 7.2 magnitude earthquake. The LHMP documents historic southern California earthquakes that affected the Moreno Valley region. In 1923, the North San Jacinto Fault earthquake damaged the San Bernardino

and Redlands area. The epicenter was located just northeast of the Planning Area in San Timoteo Canyon, and is the last known time that this fault ruptured in this area. The largest earthquake to occur within 100 miles of the Planning Area was the 7.4 magnitude Hector Mine earthquake in 1999 that occurred approximately 61 miles from the city. Additional earthquakes that have occurred within the Moreno Valley region since 1992 are presented in Table 4.7-2.

Year	Richter Scale Magnitude	Description
1992	7.2	Occurred near Landers, California and caused the rupture of five different faults. Those faults were: Johnson Valley, Landers, Homestead Valley, Emerson, and Camp Rock.
1992	7.3	Occurred 3 hours after the Landers Earthquake with an epicenter near Big Bear, California, just 34.4 miles from Moreno Valley.
1994	6.8	Northridge Earthquake occurred in a neighborhood of the city of Los Angeles and is located 78.8 miles from Moreno Valley.
1999	7.4	Hector Mine Earthquake, located 25 miles from the Landers Earthquake and just 61 miles from Moreno Valley.
2010	5.4	Borrego Springs Earthquake believed by seismologists to have been possibly triggered by the strong earthquake which occurred near Calexico in 2010.
2016	4.3	California Governor's Office of Emergency Services issued an earthquake advisory for all southern California counties following a series of small magnitude earthquakes that occurred in Bombay Beach (located in Imperial County and south of where the San Andreas fault ends). This swarm included a 4.3 magnitude quake on September 26.
2019	7.1	Occurred roughly 11 miles northeast of Ridgecrest, California or approximately 185 miles north of Moreno Valley.

### 4.7.3 Methodologies for Determining Impacts

The potential for significant impacts associated with the proposed GPU has been determined based upon review of existing secondary source information and data relative to the geology and soils resources available for the Planning Area.

### 4.7.4 Basis for Determining Significance

Thresholds used to evaluate impacts related to geology and soils are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact would occur if the project would:

- 1) 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 Division of Mines and Geology Special Publication 42);
  - ii) Strong seismic ground shaking;
  - iii) Seismic-related ground failure, including liquefaction;
  - iv) Landslides;
- 2) Result in substantial soil erosion or the loss of topsoil;
  - 3) 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;
  - 4) 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; or
  - 5) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

## 4.7.5 Impact Analysis

### 4.7.5.1 Topics 1 and 3: Seismic Hazards and Unstable Geology

*Would the project 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 Division of Mines and Geology Special Publication 42); (ii) strong seismic ground shaking? (iii) seismic-related ground failure, including liquefaction; or (iv) landslides? Would the project 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?*

The Planning Area is underlain primarily by Perris Bedrock, which is considered to be a relatively stable geologic formation. However, due to its location within southern California, and the proximity of major fault lines throughout the Planning Area, impacts associated with seismic events could occur.

#### a. Fault Rupture

As shown in Figure 4.7-1, the San Jacinto fault zone, which has been categorized as an Alquist-Priolo earthquake fault zone, traverses the northeastern and eastern boundary of the Planning Area. Specifically, the eastern portion of the Highway Office/Commercial Concept Area falls within the San Jacinto fault zone. Although the San Jacinto fault zone would be the primary source of potential damage due to fault rupture, all development within the Planning Area would be susceptible to damage due to the seismically active nature of the region. However, the Safety Element of the 2021 GPU includes the following goals, policies, and actions that would address potential geologic and seismic hazards.

**Goal**

S-1: Protect life and property from natural and human made hazards.

**Policies**

S.1-1 Continue to restrict the development of habitable structures within Alquist-Priolo Earthquake Fault Zones consistent with state law.

S.1-2 In areas of high liquefaction risk (see Map S-2), require that project proponents submit geotechnical investigation reports and demonstration that the project conforms to all recommended mitigation measures prior to City approval.

S.1-3 Require geotechnical studies for new development in areas where sewers are not available to ensure that the surrounding soil can support alternative wastewater disposal systems.

S.1-4 Ensure that structures intended for human occupancy are designed and constructed to retain their structural integrity when subjected to seismic activity, in accordance with the California Building Code.

S.1-5 Continue to regulate development on hillsides where average slope is greater than 10 percent and limit the removal of natural vegetation in hillside areas when retaining natural habitat does not pose threats to public safety.

**Actions**

S.1-A Implement the seismic upgrade projects identified in the LHMP for overcrossing bridges at State Route 60 (SR-60)/Moreno Beach, SR-60/Redlands Avenue, and SR-60/World Logistics Parkway to ensure the seismic safety of critical transportation infrastructure in the city.

S.1-B Use the building inspection program to inventory and evaluate earthquake hazards in existing buildings, especially buildings with unreinforced masonry (URM), using the most current seismic design standards and hazard reduction measures. Explore measures to encourage building owners to upgrade and retrofit structures to render them seismically safe.

Additionally, Title 8, Chapter 8.21 Grading Regulations of the Municipal Code specifies that a geotechnical report is required for all grading projects, and a preliminary soil report, preliminary engineering geology report, and/or seismicity report may be required depending on site specific conditions. Engineering geologic reports are required for all developments on hillside sites where geologic conditions are considered to have a substantial effect on existing and/or future site stability. The required reports must provide specific recommendations to facilitate a safe and stable development. Therefore, adherence to GPU Safety Element goals and policies and Municipal Code requirements would ensure that future development would

not cause substantial adverse effects associated with fault rupture, and impacts would be less than significant.

### **b. Ground Shaking**

As described in Section 4.7.1.2 above, structures throughout the Planning Area could be affected by ground shaking during a seismic event associated with the San Jacinto fault zone that traverses the northeastern and eastern boundary of the Planning Area, as well as the San Andreas Fault located approximately 15 miles northeast and the Elsinore Fault located approximately 17 miles southwest. The project would increase the number of people and structures that could be exposed to ground shaking during a seismic event. However, future development would be required to comply with the GPU Safety Element goals and policies and Municipal Code requirements described in Section 4.7.5.1.b above. Therefore, adherence to GPU Safety Element goals and policies and Municipal Code requirements would ensure that future development would not cause substantial adverse effects associated with ground shaking, and impacts would be less than significant.

### **c. Liquefaction and Landslide**

Liquefaction susceptibility ranges throughout the Planning Area from very low with deep groundwater in the northern and eastern portions of the city to very high with shallow groundwater generally west of Perris Boulevard. The areas which are subject to high and very high liquefaction potential are largely already developed (see Figure 4.7-2). Future development and redevelopment would primarily be focused within Concept Areas, which would be located within portions of the Planning Area where liquefaction risk is low. However, future development would also occur outside the Concept Areas, which may be located in areas designated with a higher liquefaction susceptibility rating.

Landslide susceptibility areas within the Planning Area are shown in Figure 4.7-3. While most of the city is flat, there are some portions of the city that have been assigned moderate and high risk for landslide, largely in slope areas. Although the Concept Areas would primarily be located within low risk areas the Residential Density Change area located at Moreno Beach Drive and Cottonwood Avenue has been assigned a moderate landslide susceptibility rating. Additionally, future development would also occur outside the Concept Areas, which may be located in areas designated with a higher landslide susceptibility rating.

All future development would be required to adhere to relevant regulations contained in the Municipal Code, including Municipal Code Section 8.21.050 which specifies that a geotechnical report would be required for all grading projects, unless otherwise waived by the city engineer. The required geotechnical report requirement would provide specific recommendations to facilitate a safe and stable development. Additionally, future development would be required to adhere to applicable GPU Safety Element goals and policies. Therefore, adherence to GPU Safety Element goals and policies and Municipal Code requirements would ensure that future development would not cause substantial adverse effects associated with liquefaction or landslides, and impacts would be less than significant.

### 4.7.5.2 Topic 2: Soil Erosion

*Would the project result in substantial soil erosion or the loss of topsoil?*

As detailed in Section 4.7.1.4, some soil types within the Planning Area are relatively stable, while others may be susceptible to collapse that may pose a hazard to new development and result in substantial soil erosion. Grading, excavation, demolition, and construction activities associated with future development would increase the potential to expose topsoil to erosion. While graded or excavated areas and fill materials would be stabilized through efforts such as compaction and installation of hardscape and landscaping, erosion potential would be higher during construction activities as the plan is built out. Erosion and sedimentation would primarily be a concern during construction phases as future developed areas would be stabilized through the installation of hardscape, landscaping, or native revegetation as appropriate. Future development would also incorporate long-term water quality controls pursuant to storm water standards including the National Pollutant Discharge Elimination System (NPDES) Municipal Permit requirements. Measures implemented to avoid or reduce erosion and sedimentation effects are discussed in Section 4.10, Hydrology and Water Quality. Short-term erosion and sedimentation impacts would be addressed through conformance with the NPDES and associated Municipal Code requirements (Title 8, Chapter 8.10 Stormwater/urban Runoff Management and Discharge Controls). These regulations required erosion and sedimentation control during construction and implementation of best management practices to avoid erosion and off-site drainage. Municipal Code Title 9, Chapter 9.17 Landscape and Water Efficiency Requirements provides additional guidance for erosion control and slope planting (Section 9.17.110). Therefore, adherence to applicable Municipal Code requirements would ensure that future development would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

### 4.7.5.3 Topic 4: Expansive Soils

*Would the project 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?*

As described in Section 4.7.1.4 above, some of the soils that occur within the Planning Area have poor to fair stability and are considered to be potentially expansive. Development within these soils could result in a significant impact due to the soils inability to support the proposed structures, especially during major rain events and/or flash floods. Future development would be required to adhere to policies included in the Safety Element of the GPU that support focusing development where risk to property and people from natural disasters would be minimized. Additionally, future development would be evaluated during site specific discretionary reviews for consistency with applicable Safety Element policies and Municipal Code requirements for project-specific geotechnical reports. Therefore, adherence to GPU Safety Element goals and policies and Municipal Code requirements would ensure that future development would not create substantial direct or indirect risks associated with expansive soils, and impacts would be less than significant.



#### 4.7.5.4 Topic 5: Paleontological Resources and Unique Geology

*Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

As shown in Figure 4.7-4, the western portion of the Planning Area is primarily classified with a high paleontological sensitivity rating, while the eastern portion of the Planning Area is classified as having a low paleontological sensitivity rating, so long as excavation does not exceed 10 feet. Impacts would be most likely to occur in native soil that has not been previously disturbed. Many areas that are classified with a high paleontological sensitivity rating have already been developed. Therefore, redevelopment projects within these areas that do not exceed the original depth of excavation are unlikely to encounter paleontological resources. Additionally, some sites that are currently vacant may have been disturbed during mass grading associated with adjacent project, and therefore are unlikely to possess any paleontological resources. The project has been designed to minimize impacts to native soil by primarily focusing on future development and redevelopment within the proposed Concept Areas. Nonetheless, construction-related ground-disturbing activities could result in significant impacts (loss) of nonrenewable paleontological resources. Because site-specific details and locations of future development projects are not known at this program-level of analysis, impacts to paleontological resources would be potentially significant.

Regarding unique geology, the city is largely flat with the exception of a few areas with rock outcroppings. Additionally, areas surrounding the city such as the badlands have unique landforms. The GPU does not propose any land use changes in the badlands and retains a low density residential designation. Rock outcrop areas within the city are not proposed for land use changes. Therefore, the project would not destroy a unique geologic feature, and impacts would be less than significant.

#### 4.7.6 Cumulative Analysis

Future development could increase the number of people exposed to seismic and geologic hazards, and erosion rates could be accelerated by earthwork for new construction. Additionally, increased development could encroach on areas with paleontological resources which could be lost if not monitored properly. Therefore, the project could contribute to a cumulatively significant impact related to geology and soils, including paleontological resources. However, all future development would be required to adhere to all relevant Municipal Code regulations and proposed policies contained in the Safety Element of the GPU. Specifically, future projects would be required to submit geotechnical reports to identify constraints and develop engineering parameters, the implementation of which would ensure potential impacts related to seismic and geological hazards would be less than significant. Implementation of mitigation measure PAL-1 described below would reduce impacts related to paleontological resources to a level less than significant. Therefore, the project would not contribute to a cumulative impact related to geology and soils.

## **4.7.7 Significance of Impacts before Mitigation**

### **4.7.7.1 Topics 1 and 3: Seismic Hazards and Unstable Geology and Topic 4: Expansive Soils**

Future development would be required to adhere to GPU Safety Element policies supporting the safety of future land uses throughout the Planning Area, thereby minimizing potential adverse impacts. Additionally, compliance with Title 8, Chapter 8.21 Grading Regulations of the Municipal Code requires a geotechnical report be prepared for all grading projects and a preliminary soil report, preliminary engineering geology report and/or seismicity report may be required depending on site specific conditions. Engineering geologic reports are required for all developments on hillside sites where geologic conditions are considered to have a substantial effect on existing and/or future site stability. The required reports must provide specific recommendations to facilitate a safe and stable development. Future development would be required to comply with GPU Safety Element policies and Municipal Code requirements for geologic reports, which would ensure that impacts related to seismic hazards and unstable geological units would be less than significant.

### **4.7.7.2 Topic 2: Soil Erosion**

Future development would incorporate long-term water quality controls pursuant to storm water standards including the NPDES Municipal Permit requirements. Municipal Code requirements (Title 8, Chapter 8.10 Stormwater/urban Runoff Management and Discharge Controls and Title 9, Chapter 9.17 Landscape and Water Efficiency Requirements) provides additional guidance for storm water management, erosion control and slope planting. Implementation of these regulations would ensure that future development would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

### **4.7.7.3 Topic 5: Paleontological Resources and Unique Geology**

Construction-related ground-disturbing activities associated with future development could result in significant impacts (loss) of nonrenewable paleontological resources. Because site-specific details and locations of future development projects are not known at this program-level of analysis, impacts to paleontological resources would be potentially significant. The land use plan avoids unique geologic features in the City including rock outcroppings and maintains low density land uses within the badlands areas. Therefore, the project would not destroy a unique geologic feature, and impacts would be less than significant.

## **4.7.8 Mitigation**

### **4.7.8.1 Topics 1 and 3: Seismic Hazards and Unstable Geology and Topic 3: Expansive Soils**

Impacts would be less than significant. No mitigation is required.

### **4.7.8.2 Topic 2: Soil Erosion**

Impacts would be less than significant. No mitigation is required.

### **4.7.8.3 Topic 4: Paleontological Resources and Unique Geology**

**PAL-1:** Applications for future development, wherein the Community Development Director or his or her designee has determined a potential for impacts to paleontological resources, shall review the underlying geology and paleontological sensitivity of the site. If it is determined that the potential exists that sensitive paleontological resources are present, the applicant shall be required to comply with the following mitigation framework.

A qualified paleontological monitor shall be present during grading in project areas where a project specific geological technical study has determined that such monitoring is necessary due to the potential for paleontological resources to reside within the underlying geologic formations. The geologic technical study shall also provide specific duties of the monitor, and detailed measures to address fossil remains, if found.

## **4.7.9 Significance of Impacts after Mitigation**

### **4.7.9.1 Topics 1 and 3: Seismic Hazards and Unstable Geology and Topic 4: Expansive Soils**

Impacts related to seismic hazards and unstable geology, soil erosion, and expansive soils would be less than significant. No mitigation is required.

### **4.7.9.2 Topic 2: Soil Erosion**

Impacts would be less than significant. No mitigation is required.

### **4.7.9.3 Topic 5: Paleontological Resources**

Impacts related to paleontological resources would be mitigated to a level less than significant.

## 4.8 Greenhouse Gas Emissions

This section analyzes the greenhouse gas (GHG) impacts that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the city of Moreno Valley (city) and sphere of influence (SOI), which are collectively referred to as the Planning Area. The analysis in this section is based on statewide GHG emissions reduction goals and the GHG inventory and projections conducted in preparation of the CAP.

### 4.8.1 Existing Conditions

#### 4.8.1.1 Greenhouse Gases and Climate Change

There are numerous GHGs, both naturally occurring and manmade. Each GHG has variable atmospheric lifetime and global warming potential (GWP). The atmospheric lifetime of the gas is the average time a molecule stays stable in the atmosphere. Most GHGs have long atmospheric lifetimes, staying in the atmosphere hundreds or thousands of years. GWP is a measure of the potential for a gas to trap heat and warm the atmosphere. Although GWP is related to its atmospheric lifetime, many other factors including chemical reactivity of the gas also influence GWP. GWP is reported as a unitless factor representing the potential for the gas to affect global climate relative to the potential of carbon dioxide (CO<sub>2</sub>). Because CO<sub>2</sub> is the reference gas for establishing GWP, by definition its GWP is 1. Although methane (CH<sub>4</sub>) has a shorter atmospheric lifetime than CO<sub>2</sub>, it has a 100-year GWP of 28; this means that CH<sub>4</sub> has 28 times more effect on global warming than CO<sub>2</sub> on a molecule-by-molecule basis.

GHG emissions estimates are typically represented in terms of equivalent metric tons of CO<sub>2</sub> (MT CO<sub>2</sub>E). CO<sub>2</sub>E emissions are the product of the amount of each gas by its GWP. The effects of several GHGs may be discussed in terms of MT CO<sub>2</sub>E and can be summed to represent the total potential of these gases to warm the global climate. Table 4.8-1 summarizes some of the most common GHGs. All of the gases in Table 4.8-1 are produced by both biogenic (natural) and anthropogenic (human) sources. The GHGs of primary concern in this analysis are CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O.

<b>Table 4.8-1 Global Warming Potentials and Atmospheric Lifetimes (years)</b>			
<b>Gas</b>	<b>Atmospheric Lifetime (years)</b>	<b>100-year GWP</b>	<b>20-year GWP</b>
Carbon dioxide (CO <sub>2</sub> )	50–200	1	1
Methane (CH <sub>4</sub> )	12.4	28	84
Nitrous oxide (N <sub>2</sub> O)	121	265	264
HFC-23	222	12,400	10,800
HFC-32	5.2	677	2,430
HFC-125	28.2	3,170	6,090
HFC-134a	13.4	1,300	3,710
HFC-143a	47.1	4,800	6,940
HFC-152a	1.5	138	506
HFC-227ea	38.9	3,350	5,360
HFC-236fa	242	8,060	6,940
HFC-43-10mee	16.1	1,650	4,310
CF <sub>4</sub>	50,000	6,630	4,880
C <sub>2</sub> F <sub>6</sub>	10,000	11,100	8,210
C <sub>3</sub> F <sub>8</sub>	2,600	8,900	6,640
C <sub>4</sub> F <sub>10</sub>	2,600	9,200	6,870
c-C <sub>4</sub> F <sub>8</sub>	3,200	9,540	7,110
C <sub>5</sub> F <sub>12</sub>	4,100	8,550	6,350
C <sub>6</sub> F <sub>14</sub>	3,100	7,910	5,890
SF <sub>6</sub>	3,200	23,500	17,500
SOURCE: Intergovernmental Panel on Climate Change (IPCC) 2007, 2014. GWP = growth warming potential			

### 4.8.1.2 GHG Inventories

#### a. State

The California Air Resources Board (CARB) performs statewide GHG inventories. The inventory is divided into the following sectors of economic activity: electricity generation, transportation, industrial, commercial, residential, agriculture and forestry. Emissions are quantified in million metric tons (MMT) of CO<sub>2</sub>E. Table 4.8-2 shows the estimated statewide GHG emissions for the years 1990, 2010, and 2018.

<b>Table 4.8-2 California GHG Emissions by Sector in 1990, 2010, and 2018</b>			
<b>Sector</b>	<b>1990<sup>1</sup> Emissions in MMT CO<sub>2</sub>E (% total)<sup>2</sup></b>	<b>2010<sup>3</sup> Emissions in MMT CO<sub>2</sub>E (% total)<sup>2</sup></b>	<b>2018<sup>3</sup> Emissions in MMT CO<sub>2</sub>E (% total)<sup>2</sup></b>
Electricity Generation	110.5 (25.7%)	90.5 (20.2%)	63.3 (14.9%)
Transportation	150.6 (35.0%)	170.2 (38.0%)	173.8 (40.9%)
Industrial	105.3 (24.4%)	101.6 (22.7%)	101.3 (23.8%)
Commercial	14.4 (3.4%)	20.1 (4.5%)	23.9 (5.6%)
Residential	29.7 (6.9%)	32.1 (7.2%)	30.5 (7.2%)
Agriculture & Forestry	18.9 (4.4%)	33.7 (7.5%)	32.6 (7.7%)
Not Specified	1.3 (0.3%)	--	--
<b>Total<sup>4</sup></b>	<b>430.7</b>	<b>448.2</b>	<b>425.3</b>

SOURCE: CARB 2007 and 2020.

<sup>1</sup>1990 data was obtained from the CARB 2007 source and are based on IPCC fourth assessment report GWPs.

<sup>2</sup>Percentages may not total 100 due to rounding.

<sup>3</sup>2010 and 2018 data was retrieved from the CARB 2020 source and are based on IPCC fourth assessment report GWPs.

<sup>4</sup>Totals may vary due to independent rounding.

As shown in Table 4.8-2, statewide GHG source emissions totaled about 431 MMT CO<sub>2</sub>E in 1990, 448 MMT CO<sub>2</sub>E in 2010, and 425 MMT CO<sub>2</sub>E in 2018. Many factors affect year-to-year changes in GHG emissions, including economic activity, demographic influences, environmental conditions such as drought, and the impact of regulatory efforts to control GHG emissions. However, transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions.

## **b. Regional**

In September 2014, the Western Riverside Council of Governments (WRCOG) adopted the *Subregional Climate Action Plan* (WRCOG 2014). The plan inventoried existing emissions within western Riverside County and outlines measures to reduce future emissions. The communitywide GHG emissions were calculated using the International Council for Local Environmental Initiatives (ICLEI) U.S. Community Protocol. The results of the community inventory for 2010 are summarized in Table 4.8-3. Similar to the statewide emissions, transportation-related GHG emissions contributed the most countywide, followed by emissions associated with energy use.

<b>Table 4.8-3 Western Riverside County GHG Emissions in 2010</b>		
Source	2010 Baseline Emissions	
	MT CO <sub>2</sub> E	%
Transportation	3,317,387	56.9%
Commercial/Industrial Energy	1,226,479	21.0%
Residential Energy	1,167,843	20.0%
Waste	112,161	1.9%
Wastewater	10,531	0.2%
<b>TOTAL INVENTORY</b>	<b>5,834,400</b>	<b>-</b>
SOURCE: WCROG 2014.		

### c. Local

A 2018 GHG emissions inventory was conducted in conjunction with preparation of the CAP. The inventory covers GHG emissions from ten sectors within the boundaries of the Planning Area. The results are summarized in Table 4.8-4.

<b>Table 4.8-4 Moreno Valley GHG Emissions in 2018</b>		
Source	2018 Baseline Emissions	
	MT CO <sub>2</sub> E	%
Transportation	483,063	55.8%
Industrial	19,589	2.3%
Residential	206,790	23.9%
Commercial	100,766	11.6%
Off-Road Equipment	37,784	4.4%
Solid Waste	7,737	0.9%
Wastewater	4,395	0.5%
Water Distribution	2,129	0.2%
Public Services and Lighting	2,219	0.3%
Agriculture	1,938	0.2%
<b>Total</b>	<b>848,513</b>	
SOURCE: Dyett & Bhatia 2021.		

## 4.8.2 Applicable Regulatory Requirements

In response to rising concern associated with increasing GHG emissions and global climate change impacts, several plans and regulations have been adopted at the international, national, and state levels with the aim of reducing GHG emissions. The following is a discussion of the federal, state, and local plans and regulations most applicable to the project.

### 4.8.2.1 Federal Regulations

The federal government, U.S. Environmental Protection Agency (USEPA), and other federal agencies have many federal level programs and projects to reduce GHG emissions. In June 2012, the Council on Environmental Quality (CEQ) revised the Federal Greenhouse Gas Accounting and Reporting Guidance originally issued in October 2010. The CEQ guidance

identifies ways in which federal agencies can improve consideration of GHG emissions and climate change for federal actions. The guidance states that National Environmental Policy Act documents should provide decision makers with relevant and timely information and should consider (1) GHG emissions of a Proposed Action and alternative actions and (2) the relationship of climate change effects to a Proposed Action or alternatives. Specifically, if a Proposed Action would be reasonably anticipated to cause direct emissions of 25,000 MT CO<sub>2</sub>E GHG emissions on an annual basis, agencies should consider this as an indicator that a quantitative assessment may be meaningful to decision makers and the public (CEQ 2012).

### **a. U.S. Environmental Protection Agency**

In 2009, the USEPA issued its science-based finding that the buildup of heat-trapping GHGs in the atmosphere endangers public health and welfare. The “Endangerment Finding” reflects the overwhelming scientific evidence on the causes and impacts of climate change. It was made after a thorough rulemaking process considering thousands of public comments, and was upheld by the federal courts.

The USEPA has many federal level programs and projects to reduce GHG emissions. The USEPA provides technical expertise and encourages voluntary reductions from the private sector. One of the voluntary programs applicable to the project is the Energy Star program. Energy Star products such as appliances, building products, heating and cooling equipment, and other energy-efficient equipment would be utilized by the project.

Energy Star is a joint program of USEPA and the U.S. Department of Energy, which promotes energy-efficient products and practices. Tools and initiatives include the Energy Star Portfolio Manager, which helps track and assess energy and water consumption across an entire portfolio of buildings, and the Energy Star Most Efficient 2020, which provides information on exceptional products which represent the leading edge in energy-efficient products in the year 2020 (USEPA 2021a).

The USEPA also collaborates with the public sector, including states, tribes, localities and resource managers, to encourage smart growth, sustainability preparation, and renewable energy and climate change preparation. These initiatives include the Clean Energy – Environment State Partnership Program, the Climate Ready Water Utilities Initiative, the Climate Ready Estuaries Program, and the Sustainable Communities Partnership (USEPA 2021b).

### **b. Corporate Average Fuel Economy Standards**

The project would generate vehicle trips that would consume fuel and generate GHG emissions. The federal Corporate Average Fuel Economy (CAFE) standards determine the fuel efficiency of certain vehicle classes in the U.S. The first phase of the program applied to passenger cars, new light-duty trucks, and medium-duty passenger cars with model years 2012 through 2016, and required these vehicles to achieve a standard equivalent to 35.5 miles per gallon (mpg). The second phase of the program applies to model years 2017 through 2025 and increased the standards to 54.5 mpg. Separate standards were also established for medium- and heavy-duty vehicles. The first phase applied to model years 2014 through 2018



and the second phase applies to model years 2018 through 2027. With improved gas mileage, fewer gallons of transportation fuel would be combusted to travel the same distance, thereby reducing nationwide GHG emissions associated with vehicle travel.

### **4.8.2.2 State Regulations**

#### **a. Statewide GHG Emission Targets**

##### ***S-3-05—Statewide GHG Emission Targets***

This executive order (EO) establishes the following GHG emissions reduction targets for the state of California:

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

This EO also directs the secretary of the California Environmental Protection Agency to oversee the efforts made to reach these targets, and to prepare biannual reports on the progress made toward meeting the targets and on the impacts to California related to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. With regard to impacts, the report shall also prepare and report on mitigation and adaptation plans to combat the impacts. The first Climate Action Team Assessment Report was produced in March 2006, and has since been updated every two years.

##### ***B-30-15—2030 Statewide GHG Emission Goal***

This EO, issued on April 29, 2015, establishes an interim GHG emission reduction goal for the state of California by 2030 of 40 percent below 1990 levels. This EO also directed all state agencies with jurisdiction over GHG emitting sources to implement measures designed to achieve the new interim 2030 goal, as well as the pre-existing, long-term 2050 goal identified in EO S-3-05. Additionally, this EO directed CARB to update its Climate Change Scoping Plan to address the 2030 goal.

#### **b. Assembly Bill 32—California Global Warming Solutions Act of 2006**

In response to EO S-3-05, the California Legislature passed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, and thereby enacted Sections 38500–38599 of the California Health and Safety Code. The heart of AB 32 is its requirement that CARB establish an emissions cap and adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020. AB 32 also required CARB to adopt a plan by January 1, 2009, indicating how emission reductions would be achieved from significant GHG sources via regulations, market mechanisms, and other actions.

### **c. Senate Bill 32—California Global Warming Solutions Act Update**

Approved in September 2016, Senate Bill (SB) 32 updates the California Global Warming Solutions Act of 2006 and enacts EO B-30-15. Under SB 32, the state would reduce its GHG emissions to 40 percent below 1990 levels by 2030. This is equivalent to an emissions level of approximately 260 MMT CO<sub>2</sub>E for 2030. In implementing the 40 percent reduction goal, CARB is required to prioritize emissions reductions to consider the social costs of the emissions of GHGs; where “social costs” is defined as “an estimate of the economic damages, including, but not limited to, changes in net agricultural productivity; impacts to public health; climate adaptation impacts, such as property damages from increased flood risk; and changes in energy system costs, per metric ton of greenhouse gas emission per year.”

### **d. Climate Change Scoping Plan**

As directed by the California Global Warming Solutions Act of 2006, CARB adopted the *Climate Change Scoping Plan: A Framework for Change (Scoping Plan)* in 2008, which identifies the main strategies California will implement to achieve the GHG reductions necessary to reduce forecasted business as usual (BAU) emissions in 2020 to the state’s historic 1990 emissions level (CARB 2008). In November 2017, CARB released the 2017 Climate Change Scoping Plan Update, the Strategy for Achieving California’s 2030 Greenhouse Gas Target (2017 Scoping Plan; CARB 2017). The 2017 Scoping Plan identifies state strategies for achieving the state’s 2030 interim GHG emissions reduction target codified by SB 32. Measures under the 2017 Scoping Plan Scenario build on existing programs such as the Low Carbon Fuel Standard, Advanced Clean Cars Program, Renewables Portfolio Standard (RPS), Sustainable Communities Strategy (SCS), Short-Lived Climate Pollutant Reduction Strategy, and the Cap-and-Trade Program. Additionally, the 2017 Scoping Plan proposes new policies to address GHG emissions from natural and working lands.

### **e. Regional Emissions Targets – SB 375**

SB 375, the 2008 Sustainable Communities and Climate Protection Act, was signed into law in September 2008 and requires CARB to set regional targets for reducing passenger vehicle GHG emissions in accordance with the Scoping Plan. The purpose of SB 375 is to align regional transportation planning efforts, regional GHG reduction targets, and fair-share housing allocations under state housing law. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt an SCS or Alternative Planning Strategy to address GHG reduction targets from cars and light-duty trucks in the context of that MPO’s Regional Transportation Plan (RTP). Southern California Association of Governments (SCAG) is the region’s MPO. In 2018, CARB set targets for the SCAG region of an 8 percent reduction in GHG emissions per capita from automobiles and light-duty trucks compared to 2005 levels by 2020 and a 19 percent reduction by 2035. These targets are periodically reviewed and updated.

## **f. Renewables Portfolio Standard**

The RPS promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020 (referred to as the "Initial RPS"), the goal has been accelerated and increased by EOs S-14-08 and S-21-09 to a goal of 33 percent by 2020. In April 2011, SB 2 (1X) codified California's 33 percent RPS goal. SB 350 (2015) increased California's renewable energy mix goal to 50 percent by year 2030. SB 100 (2018) further increased the standard set by SB 350 establishing the RPS goal of 44 percent by the end of 2024, 52 percent by the end of 2027, and 60 percent by 2030.

## **g. California Building Standards Code (Title 24)**

The California Code of Regulations (CCR), Title 24, is referred to as the California Building Code (CBC). It consists of a compilation of several distinct standards and codes related to building construction including, plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility and so on. Of particular relevance to GHG emissions reductions are the CBC's energy efficiency and green building standards as outlined below.

### ***Title 24, Part 6 – Energy Code***

The California Code of Regulations, Title 24, Part 6 is the California Energy Efficiency Standards for Residential and Nonresidential Buildings (also known as the California Energy Code). This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Energy Code is updated periodically to incorporate and consider new energy-efficient technologies and methodologies as they become available, and incentives in the form of rebates and tax breaks are provided on a sliding scale for buildings achieving energy efficiency above the minimum standards.

The current version of the Energy Code, known as 2019 Title 24, or the 2019 Energy Code, became effective January 1, 2020. The Energy Code provides mandatory energy-efficiency measures as well as voluntary tiers for increased energy efficiency. The California Energy Commission (CEC), in conjunction with the California Public Utilities Commission, has adopted a goal that all new residential and commercial construction achieve zero net energy by 2020 and 2030, respectively. It is expected that achievement of the zero net energy goal will occur via revisions to the Title 24 standards.

### ***Title 24, Part 11 – California Green Building Standards Code***

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11 first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 CBC). The most recent 2019 CALGreen institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of

residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements.

The mandatory standards require:

- Outdoor water use requirements as outlined in local water efficient landscaping ordinances or current Model Water Efficient Landscape Ordinance standards, whichever is more stringent;
- Requirements for water conserving plumbing fixtures and fittings;
- 65 percent construction/demolition waste diverted from landfills;
- Infrastructure requirements for electric vehicle charging stations;
- Mandatory inspections of energy systems to ensure optimal working efficiency; and
- Requirements for low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards.

Similar to the reporting procedure for demonstrating Energy Code compliance in new buildings and major renovations, compliance with the CALGreen mandatory requirements must be demonstrated through completion of compliance forms and worksheets.

### 4.8.2.3 Local

#### a. Existing 2006 General Plan

The Conservation Element of the existing 2006 General Plan discusses the City's commitment to providing a more livable, equitable, and economically vibrant community through the incorporation of sustainability features, energy efficiency, and reduction of GHG emissions. As stated in the Conservation Element, most policies intended to reduce energy use and GHG emissions were incorporated into the Energy Efficiency and Climate Action Strategy. Sustainability policies in the General Plan address transportation-related GHG emissions by promoting sustainable land use patterns and developing infrastructure to provide alternatives to single occupant vehicle travel. These policies include:

**Objective 2.4:** Provide commercial areas within the City that are conveniently located, efficient, attractive, and have safe and easy pedestrian and vehicular circulation in order to serve the retail and service commercial needs of Moreno Valley residents and businesses.

**Objective 5.10:** Encourage bicycling as an alternative to single occupant vehicle travel for the purpose of reducing fuel consumption, traffic congestion, and air pollution.

## b. Energy Efficiency and Climate Action Strategy

In October 2012, the City adopted its Energy Efficiency and Climate Action Strategy (Moreno Valley 2012). The main objectives of the Strategy are to reduce the environmental and fiscal impacts of energy usage and GHG emissions in municipal facilities and within the community. The strategy adopts a comprehensive list of measures intended to reduce energy consumption, reduce water use, encourage recycling and waste diversion, promote use of alternative fuel vehicles, facilitate the use of renewable energy, or otherwise reduce GHG emissions. Policy measures support the following:

- **R2-T1:** Land Use Based Trips and VMT [Vehicle Miles Travelled] Reduction Policies. Encourage the development of Transit Priority Projects along High Quality Transit Corridors identified in the SCAG Sustainable Communities Plan, to allow a reduction in vehicle miles traveled.
- **R2-T3:** Employment-Based Trip Reductions. Require a Transportation Demand Management (TDM) program for new development to reduce automobile travel by encouraging ride-sharing, carpooling, and alternative modes of transportation.
- **R2-E1:** New Construction Residential Energy Efficiency Requirements. Require energy efficient design for all new residential buildings to be 10% beyond the current Title 24 standards. (Reach Code)
- **R2-E2:** New Construction Residential Renewable Energy. Facilitate the use of renewable energy (such as solar (photovoltaic) panels or small wind turbines) for new residential developments. Alternative approach would be the purchase of renewable energy resources offsite.
- **R2-E5:** New Construction Commercial Energy Efficiency Requirements. Require energy efficient design for all new commercial buildings to be 10% beyond the current Title 24 standards. (Reach Code)
- **R3-E1:** Energy Efficient Development, and Renewable Energy Deployment Facilitation and Streamlining. Updating of codes and zoning requirements and guidelines to further implement green building practices. This could include incentives for energy efficient projects.
- **R3-L2:** Heat Island Plan. Develop measures that address “heat islands.” Potential measures include using strategically placed shade trees, using paving materials with a Solar Reflective Index of at least 29, an open grid pavement system, or covered parking.
- **R2-W1:** Water Use Reduction Initiative. Consider adopting a per capita water use reduction goal which mandates the reduction of water use of 20 percent per capita with requirements applicable to new development and with cooperative support of the water agencies.
- **R3-W1:** Water Efficiency Training and Education. Work with EMWD [Eastern Municipal Water District] and local water companies to implement a public information and education program that promotes water conservation.

- **R2-S1: City Diversion Program.** For Solid Waste, consider a target of increasing the waste diverted from the landfill to a total of 75% by 2020.

### 4.8.3 Methodologies for Determining Impacts

A GHG inventory and projections were prepared in conjunction with the CAP. This includes a year 2018 baseline inventory and year 2040 projects for buildout of the project as well as buildout of the existing 2006 General Plan. ICLEI US Community Protocol assumptions were used to estimate emissions from solid waste disposal, process and fugitive emissions from wastewater treatment, and residential, commercial, industrial, and wastewater treatment natural gas use. The CARB's EMFAC2021 model was used to calculate transportation emissions, and CARB's OFFROAD model was used to calculation emissions from the off-road equipment sector. Future emissions are based on projected population, employment, and land use buildout numbers for the project and existing 2006 General Plan. The following is a discussion of the methodology used to calculate emissions from each source.

#### 4.8.3.1 Transportation

Transportation emissions are based on vehicle miles traveled (VMT) for on-road vehicles. The SCAG model, consistent with the RTP/SCS growth projections for population, households, and jobs within Moreno Valley through 2040, was used to estimate the VMT generated by land uses in the Planning Area. To assess the VMT, the production and attraction (PA) method was used which records all home-based production and home-based-work production and attraction vehicular trips generated by land uses in the City and across the entire regional network. VMT is adjusted to halve trip VMT for trips that begin in the Planning Area but end outside the Planning Area or those that begin outside but end inside. The Planning Area generates 3,144,986 VMT in the existing condition, buildout of the existing 2006 General Plan would generate 4,566,084 VMT, and buildout of the project would generate 4,524,038 VMT (Fehr & Peers 2021). CARB's EMFAC2021 model was used to calculate transportation emissions.

#### 4.8.3.2 Energy

Emissions from electricity consumption were calculated using electricity usage for the residential, commercial, and industrial sectors along with Southern California Edison's (SCE's) 2018 GHG per unit of electricity provided in Edison International's 2019 Corporate Responsibility Report: 0.23 MT CO<sub>2</sub>E per megawatt-hour. SCE provided electricity usage for the commercial and residential sectors for year 2019. Agricultural and industrial electricity usage was estimated from SCE's Quarterly Customer Data Reports for 2019, which provide high level data aggregated by zip code and sector that cannot be linked to an individual customer. Moreno Valley Utility provided 2019 electricity usage for the following rate categories: residential, small commercial, large commercial, industrial (manufacturing), city accounts, pumping and agriculture, streetlights, and traffic signals.

Emissions from natural gas consumption were calculated using natural gas usage for the residential, commercial, and industrial sectors, along with emissions factors provided in

Appendix C of the ICLEI Protocol: 0.0053 MT CO<sub>2</sub>E per therm. Southern California Gas Company provided 2019 natural gas usage for the following rate categories: commercial, industrial, single-family residential, and multi-family residential.

### **4.8.3.3 Off-Road Equipment**

Off-road emissions in the City include lawn and garden equipment, construction equipment, and industrial equipment, in addition to other categories for which CARB's EMFAC2021 model generates emission outputs. The model generates emissions for a total of 16 categories across Riverside County. Emissions were calculated for the portion of Riverside County that lies in SCAB. These emissions were then pro-rated by the City's share of the county population within SCAB.

### **4.8.3.4 Solid Waste**

Emissions from disposal of solid waste were calculated using the total organic commercial, residential, and other solid waste disposed of in landfills in 2019 provided by Waste Management and Riverside County Department of Waste Resources. There was a total of 92,471 tons of commercial waste, 34,706 tons of residential waste, and 30,907 tons of waste from other sources including roll-off and construction waste generated and disposed of within the City. These data were multiplied by emissions factors used in the USEPA's Waste Reduction Model. In 2019, Moreno Valley diverted 7.6 percent of commercial waste, 35.8 percent of residential waste, and 35.6 percent of roll-off waste.

### **4.8.3.5 Water**

Emissions from supplying water were calculated using the 2019 electricity and natural gas consumption provided by Eastern Municipal Water District (EMWD) and Box Springs Mutual Water Company for potable and reclaimed water: 4,651,580 kilowatts per hour (kWh) and 199,577 therms, respectively. Box Springs does not use natural gas in water management and delivery. In 2019, EMWD supplied 11,112.47 million gallons of water and Box Springs supplied 74.104 million gallons to the city.

### **4.8.3.6 Water Treatment**

Emissions from wastewater treatment were calculated using the 2019 electricity and natural gas consumption provided by EMWD for the management of wastewater: 9,441,777 kWh and 419,096 therms, respectively. In 2019, EMWD managed 13,793.26 million gallons of wastewater generated by the city.

Edgemont Community Services District (ECSD) also provides wastewater treatment services to Moreno Valley. However, ECSD owns and maintains an all gravity sewer collection system and therefore does not consume any electricity or natural gas in the maintenance and operation of its system. All of the effluent from the District's system runs into the City of Riverside collection system. From there, it enters the treatment plant maintained by the City of Riverside. In 2019, the ECSD managed 195.88 million gallons of wastewater generated by

the City. Given the nature of ECSD's sewer collection system, emissions associated with this source are not included in the baseline emissions analysis.

### **4.8.3.7 Public Lighting**

Emissions from public lighting were calculated using electricity usage for street lights and traffic signals in the Planning Area. Moreno Valley Utility provided 2019 electricity consumption data: 1,206,720 kWh from street lights and 189,099 kWh from traffic signals. Additionally, SCE provided that 4,686,354 kWh was used in 2019 to power street lights.

### **4.8.3.8 Agriculture**

Emissions from agricultural sources were calculated using electricity usage for the agricultural sector along with SCE's 2018 GHG emission factor per unit of electricity. Agricultural electricity usage was estimated from SCE's Quarterly Customer Data Reports for 2019. This was added to electricity usage data for pumping and agriculture provided by Moreno Valley Utility. SoCal Gas did not provide natural gas usage data for the agriculture sector.

## **4.8.4 Basis for Determining Significance**

Thresholds used to evaluate impacts to GHG emissions are based on applicable criteria in the CEQA Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact would occur if the project would:

- 1) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- 2) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs.

GHG impacts were evaluated by determining if the project would sufficiently reduce its overall GHG emissions consistent with the state's emission reduction goals as expressed in EO B-30-15 and EO S-3-05. EO B-30-15 calls for a statewide reduction in GHG emissions to 40 percent below 1990 levels by 2030. EO S-3-05 calls for a reduction to 80 percent below 1990 levels by 2050. This EIR evaluates whether or not the project incorporates efficiency and conservation measures sufficient to contribute its portion of the overall GHG reductions necessary for the State to achieve its own mandates. If the project demonstrates that it is sufficiently reducing its overall GHG emissions, impacts can be determined not to be cumulatively considerable.



## 4.8.5 Impact Analysis

### 4.8.5.1 Topic 1: GHG Emissions

*Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

The proposed CAP is designed to reinforce the City's commitment to GHG emissions, and demonstrate how the City will comply with the state of California's GHG emission reduction standards. As a Qualified GHG Reduction Strategy, the CAP will also enable streamlined environmental review of future development projects, in accordance with CEQA.

The CAP includes:

- An inventory of the City's GHG emissions;
- Forecasts of future GHG emissions;
- Measures to reduce GHG emissions consistent with State requirements; and
- Monitoring and reporting processes to ensure targets are met.

The CAP demonstrates compliance with the statewide GHG target for 2030 (40 percent below 1990 levels per EO B-30-15), as well as for the project horizon year of 2040 (derived from 80 percent below 1990 levels by 2050 per EO S-3-05). The CAP also demonstrates consistency with the 2017 CARB Scoping Plan, which provides guidance for local communities to meet AB 32 and EO S-3-05 targets.

Per CARB, local actions—such as general plans and climate action plans—are essential tools for the state to meet its GHG emission reduction goals. The 2017 Scoping Plan provides guidance for local communities to meet AB 32 and EO S-3-05 targets; therefore, the CAP must demonstrate consistency with Scoping Plan targets. According to the Scoping Plan, local agencies should target total emissions of no more than 6 MT CO<sub>2</sub>E per capita per year by 2030 and no more than 2 MT CO<sub>2</sub>E per capita by 2050 to be consistent with the 2017 Scoping Plan and the state's long-term goals. The GHG emission targets established in the proposed CAP are based on the goals established by EO S-3-15 and SB 32, consistent with the CAP guidelines established in the 2017 Scoping Plan. The horizon year for analysis in the proposed CAP is 2040, corresponding with the horizon year established in the 2021 GPU. Thus, the CAP includes targets of 6 MT CO<sub>2</sub>E per capita per year by 2030 and 4 MT CO<sub>2</sub>E per capita per year by 2040 (derived from the Scoping Plan target of 2 MT CO<sub>2</sub>E per capita per year in 2050). The proposed 2040 target of 4 MT CO<sub>2</sub>E per capita per year is determined using a linear trajectory in emissions reduction between 2030 and 2050.

The 2018 inventory and 2040 forecast cover GHG emissions from ten sectors within the Planning Area. Emissions were calculated using the methodology summarized in Section 4.8.3. Buildout under the existing 2006 General Plan and 2021 GPU scenarios would result in different patterns of growth and would be comprised of a different mix of land uses. Therefore, different levels of emissions would result. Table 4.8-5 summarizes the baseline and forecast year emissions.

Sector	2018 Baseline	Existing 2006 General Plan (2040)	2021 GPU (2040)
Residential	206,790	257,663	264,683
Commercial	100,766	183,539	159,749
Industrial	19,589	383,075	320,135
Transportation	483,063	514,051	509,317
Solid Waste	7,737	11,754	10,880
Water	2,129	2,602	2,582
Wastewater	4,395	5,372	5,330
Agriculture	1,938	1,938	1,938
Off-Road Equipment	37,784	50,143	49,279
Public Services and Lighting	2,219	1,208	1,208
<b>Total</b>	<b>866,410</b>	<b>1,411,346</b>	<b>1,325,101</b>
<i>Population</i>	<i>207,946</i>	<i>256,600</i>	<i>252,179</i>
<b>MT CO<sub>2</sub>E Per Capita without CAP GHG Reduction Measures</b>	<b>4.17</b>	<b>5.50</b>	<b>5.25</b>

SOURCE: Dyett & Bhatia 2021.

As shown in Table 4.8-5, without implementation of GHG reduction measures identified in the CAP, buildout of the 2021 GPU is projected to exceed the 2040 emission target of 4 MT CO<sub>2</sub>E per capita. Although buildout of the 2021 GPU would result in fewer GHG emissions compared to buildout of the existing 2006 General Plan, it would still exceed standards established in CARB's 2017 Scoping Plan based solely on the goals, policies, and actions proposed in the 2021 GPU. The City would need to reduce emissions by 316,385 MT CO<sub>2</sub>E in order to achieve the 2040 emissions target and be consistent with the 2017 Scoping Plan and Statewide goals.

Therefore, the proposed CAP developed a Qualified GHG Reduction Strategy that would reduce GHG emissions below the standards established in CARB's 2017 Scoping Plan. These strategies would serve to reduce GHG emissions associated with transportation, industrial, residential, commercial, water, public services and public lighting, and off-road equipment uses. Each measure includes a range of effectiveness estimated from the CAPCOA's Quantifying Greenhouse Gas Mitigation Measures (CAPCOA 2010) and academic literature. Table 4.8-6 summarizes the CAP GHG reduction measures along with the estimated effectiveness.

<b>Table 4.8-6 CAP GHG Reduction Measures</b>			
<b>Strategy</b>	<b>Range of Effectiveness</b>	<b>Assumed Effectiveness</b>	<b>Estimated GHG Emission Reductions (MT CO<sub>2</sub>E per year)</b>
<b>TRANSPORTATION</b>			
TR-1: Partner with Moreno Valley Unified School District, Val Verde Unified School District and Moreno Valley College to establish an online system like 511.org that links employees and guardians of students to provide carpool matching.	7.2-15.8%	7.2%	36,671
TR-2: Continue to implement a Safer Routes to School program for increased bicycle and pedestrian safety to and from schools.	7.2-15.8%	7.2%	36,671
TR-3: Encourage businesses with over 50 employees to implement Transportation Demand Management strategies and programs identified in Connect SoCal, the Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy, including but not limited to: implementing commuter benefit programs, promoting telecommuting and alternative work schedule options, and other financial incentives. Establish a goal of achieving a 10 percent increase in alternative mode use by workers in Moreno Valley.	5.0-30.0%	10.0%	50,932
TR-4: Create a Transportation Demand Management program for City staff to promote alternative transportation modes and carpooling to the greatest extent possible.	5.0-10.0%	5.0%	25,466
TR-5: Implement trip reduction programs in new residential, commercial, and mixed-use developments.	5.0-10.0%	5.0%	25,466
TR-6: Advocate for transit service improvements by area transit providers with an emphasis on coordinating public transit schedules and connections and for subsidies for a higher level of transit service and/or more transit passes for residents and/or employees.	0.3-20.0%	1.0%	5,093
TR-7: Secure funding to install electric vehicle recharging stations or other alternative fuel vehicle support infrastructure in existing public and private parking lots.	0.5-12.7%	12.7%	64,683
TR-8: Increase the number of efficient or alternatively fueled vehicles in the City fleet as vehicles are turned over.	0.4-20.3%	1.0%	5,093

<b>Table 4.8-6 CAP GHG Reduction Measures</b>			
Strategy	Range of Effectiveness	Assumed Effectiveness	Estimated GHG Emission Reductions (MT CO <sub>2</sub> E per year)
TR-9: Consider requiring new multi-family residential and mixed use development to reduce the need for external trips by providing useful services/facilities on-site such as an ATM, vehicle refueling, electric vehicle infrastructure, and shopping.	Supportive	--	--
TR-10: Create at least one day a year when a portion of streets and plazas is designated for pedestrian and/or bicycle access only.	Supportive	--	--
<b>Total Transportation Emissions Reduction:</b>			<b>250,075</b>
<b>INDUSTRIAL</b>			
I-1: Actively promote the use of energy-efficient building operations systems in existing and new industrial facilities with the goal of achieving a 40 percent energy reduction in 30 percent of industrial square footage citywide by 2040. Effectiveness should be confirmed through commissioning of new systems.	12.0-16.0%	12.0%	38,416
I-2: Promote and incentivize solar installations on new and existing industrial and warehousing facilities through partnerships with energy providers (e.g. Moreno Valley Utility [MVU], Southern California Edison [SCE]) and other private sector funding sources, with the goal of providing 25 percent of energy needs with solar in 30 percent of industrial and warehouse square footage by 2040. Examples of incentives include reduced permit fees or streamlined permit approval processes.	7.0%	7.0%	22,409
I-3: Work with electricity providers (e.g. MVU, SCE) to encourage large commercial and industrial facilities to participate in energy efficient upgrade programs including installation of solar PV systems and EV chargers and to establish annual targets.	0.5%	0.5%	1,601
I-4: Develop and implement Technology Advancement Program, working with industrial, warehousing, and distribution facilities to encourage innovation, development of new emissions reduction technologies, and energy efficient/alternative fueled equipment upgrades. Provide incentives through partnerships with regional, statewide, and federal programs.	0.4-20.3%	1.0%	3,201
<b>Total Industrial Emissions Reduction:</b>			<b>65,628</b>

<b>Table 4.8-6 CAP GHG Reduction Measures</b>			
Strategy	Range of Effectiveness	Assumed Effectiveness	Estimated GHG Emission Reductions (MT CO <sub>2</sub> E per year)
<b>RESIDENTIAL</b>			
R-1: Provide incentives such as streamlined permitting or bonus density for new multi-family buildings and re-roofing projects to install “cool” roofs consistent with the current California Green Building Code (CALGreen) standards for commercial and industrial buildings.	25.0%	25.0%	13,549
R-2: Require new construction and major remodels to install interior real-time energy smart meters in line with current utility provider (e.g. MVU, SCE) efforts.	25.0%	25.0%	18,858
R-3: Develop and implement program to incentivize single-family residential efficiency retrofits and participation in MVU direct install program with the goal of a 50 percent energy reduction compared to baseline in 30 percent of the total single-family homes citywide by 2040.	6.9%	6.9%	1,465
R-4: Prioritize cap and trade funds to assist low-income homeowners achieve energy-efficient improvements and fund weatherization programs.	3.7-7.5%	3.7%	9,793
R-5: Apply for and prioritize Community Block Development Grant funds to assist low-income homeowners achieve energy-efficient improvements.	3.7-7.5%	3.7%	9,793
R-6: Develop program and funding strategy to incentivize conversion of natural gas heated homes and nonresidential buildings to electricity.	2.0-3.0%	2.0%	4,185
R-7: Develop and implement program to incentivize multi-family residential efficiency audits and participation in MVU direct install program with the goal of a 50 percent energy reduction in 30 percent of the projected amount of multi-family homes citywide by 2035	0.0-15.0%	15.0%	12,955
R-8: Provide a toolkit of resources, including web-based efficiency calculators, for residents and businesses to analyze their greenhouse gas emissions in comparison to their neighborhood, the city, and the region.	Supportive	--	--
R-9: Develop and implement a competitive greenhouse gas reduction program with an award component between groups of citizens in the city.	Supportive	--	--
<b>Total Residential Emissions Reduction:</b>			<b>70,599</b>

<b>Table 4.8-6 CAP GHG Reduction Measures</b>			
Strategy	Range of Effectiveness	Assumed Effectiveness	Estimated GHG Emission Reductions (MT CO <sub>2</sub> E per year)
<b>COMMERCIAL</b>			
C-1: Expand efforts to install energy-efficient lighting technologies in new and existing private parking lots.	0.0-68%	20.0%	21,999
C-2: Facilitate energy efficiency improvements in nonresidential buildings through incentives and regulations that may include energy performance reports, time of sale upgrades, and/or innovative partnerships such as expansion of utility provider (e.g. MVU, SCE, SoCal Gas) programs to reduce energy use.	5.2-15.0%	5.2%	8,307
C-3: Promote energy efficiency financing programs to medium to large sized commercial facilities.	0.4%	0.4%	479
C-4: Promote MVU and SCE direct install energy efficiency programs to help small businesses identify opportunities to save electricity.	0.4%	0.4%	158
C-5: Actively engage with Moreno Valley businesses to identify areas for GHG reduction and financial savings.	Supportive	--	--
<b>Total Commercial Emissions Reduction:</b>			<b>30,945</b>
<b>OFF-ROAD EQUIPMENT</b>			
OR-1: Encourage residents and businesses to use efficient lawn and garden maintenance equipment or to reduce the need for landscape maintenance through native planting. <ul style="list-style-type: none"> <li>• Partner with the SCAQMD to establish a voluntary exchange program for residential electric lawnmowers and backpack-style leaf blowers.</li> <li>• Require new buildings to provide electrical outlets in an accessible location to facilitate use of electric-powered lawn and garden equipment</li> <li>• In project review, encourage the replacement of high-maintenance landscapes (like grass turf) with native vegetation to reduce the need for gas-powered lawn and garden equipment.</li> </ul>	0.0-49.5%	10.0%	4,928

<b>Table 4.8-6 CAP GHG Reduction Measures</b>			
Strategy	Range of Effectiveness	Assumed Effectiveness	Estimated GHG Emission Reductions (MT CO <sub>2</sub> E per year)
OR-2: Reduce emissions from heavy-duty construction equipment by limiting idling based on South Coast Air Quality Management District (SCAQMD) requirements and utilizing cleaner fuels, equipment, and vehicles. <ul style="list-style-type: none"> <li>• Require provision of clear signage reminding construction workers to limit idling</li> <li>• Require project applicants to limit GHG emissions through one or more of the following measures: substitute electrified or hybrid equipment for diesel/gas powered, use alternative-fueled equipment on site, avoid use of on-site generators.</li> </ul>	2.5-22.0%	2.5%	1,232
<b>Total Off-Road Equipment Emissions Reduction:</b>			<b>6,160</b>
<b>PUBLIC SERVICES AND PUBLIC LIGHTING</b>			
PS-1: Participate in Savings by Design program to identify ways to improve the energy efficiency for all new municipal buildings and facilities. As part of the Savings By Design program, new municipal buildings and facilities shall have a goal to exceed Title 24 Building Standards by 10%.	0.2-5.5% (electricity) 0.7-10% (natural gas)	5.5%	66
PS-2: Expand City of Moreno Valley's Environmental Procurement Administrative Procedure to address energy efficient equipment.	5.0-10.0%	10.0%	121
PS-3: Support Moreno Valley Utility and Southern California's efforts to conduct an annual municipal energy audit to determine if energy efficient retrofits are effective in reducing emissions from City operations.	Supportive	--	--
PS-4: Utilize Energy Management tools to monitor long-term impacts of municipal efficiency projects.	Supportive	--	--
<b>Total Public Services and Public Lighting Emissions Reduction:</b>			<b>187</b>
<b>NATURAL RESOURCES</b>			
NC-1: Require new landscaping to be climate appropriate.	Supportive	--	--
NC-2: Encourage residents and businesses to use efficient lawn and garden maintenance equipment or to reduce the need for landscape maintenance through native planting.	Supportive	--	--
NC-3: Increase and maintain urban greening in the community by maintaining Tree City USA status and promoting tree planting and urban gardening programs.	Supportive	--	--
<b>Total Natural Resources Emissions Reduction:</b>			<b>0</b>
<b>TOTAL CAP STRATEGIES EMISSIONS REDUCTION:</b>			<b>398,128</b>
SOURCE: Dyett & Bhatia 2021.			

As a whole, the CAP GHG reduction strategies were designed to the City to achieve its GHG reduction target in the year 2040. The combined GHG reductions from these measures is 423,594 MT CO<sub>2</sub>E in 2040, which cover the emissions “gap” identified in Table 4.8-5. Table 4-8-7 adds the effect of the CAP GHG reduction measures to the 2021 GPU forecast, and compares the resulting forecast with CAP GHG reduction strategies to the BAU forecast and 2021 GPU forecast (without CAP strategies). As shown, implementation of the CAP would enable the City to meet the emissions target for 2040 and be consistent with Statewide reduction goals.

**Table 4.8-7  
2040 GHG Emissions Forecast with CAP Strategies (MT CO<sub>2</sub>E)**

Sector	BAU Emissions (2040)	2021 GPU Emissions (2040)	Emissions Reduction from CAP Strategies (2040)	2021 GPU Emissions with CAP Strategies (2040)
Residential	257,663	264,683	70,599	194,084
Commercial	183,539	159,749	30,945	128,804
Industrial	383,075	320,135	65,628	254,507
Transportation	514,051	509,317	250,075	259,242
Solid Waste	11,754	10,880	0	10,880
Water	2,602	2,582	0	2,582
Wastewater	5,372	5,330	0	5,330
Agriculture	1,938	1,938	0	1,938
Off-Road Equipment	50,143	49,279	6,160	43,119
Public Services and Lighting	1,208	1,208	187	1,021
<b>TOTAL</b>	<b>1,411,346</b>	<b>1,325,101</b>	<b>423,594</b>	<b>901,508</b>
<i>Population</i>	<i>256,600</i>	<i>252,179</i>		<i>252,179</i>
<b>MT CO<sub>2</sub>E Per Capita without CAP GHG Reduction Measures</b>	<b>5.50</b>	<b>5.25</b>	<b>1.68</b>	<b>3.57</b>

SOURCE: Dyett & Bhatia 2021.

Implementation and monitoring are key components of the CAP to ensure that the City is successful in reaching these identified reduction targets. The City will annually monitor and report on CAP implementation activities. The annual monitoring report will include implementation status of each action and progress towards achieving the performance targets of the corresponding emissions reduction measure. The annual monitoring report will also include information on the status of the federal, state, regional, and local level emissions reduction strategies, as well as any new efforts that may emerge in the reporting year. The City will also update the GHG inventory every five years. If an updated inventory reveals that the CAP is not making adequate progress toward meeting the GHG target, or that new technologies and programs emerge that warrant inclusion in the CAP, the City will adjust the CAP by modifying, adding, and/or replacing measures as necessary. New opportunities for GHG reductions, including new funding sources and the ability to link city reduction actions to the City’s Capital Improvement Plan, Infrastructure Replacement and Fleet Vehicle Replacement schedules, and other programs can also be incorporated into future updates of the CAP.



Implementation of the GHG reduction and adaptation measures identified in the CAP would reduce the City's emissions consistent with statewide GHG emission reduction goals. Therefore, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Impacts would be less than significant.

#### **4.8.5.2 Topic 2: GHG Plans**

*Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs?*

Applicable plans, policies, or regulations include statewide GHG emission targets established by AB 32 and SB 32; a longer-term statewide policy goals established by EO S-3-05; the 2017 Scoping Plan (which establishes a specific statewide plan to achieve the 2030 target); SCAG's RTP/SCS; regulations regarding increased use renewables for electricity production (RPS); and the California Energy Code. As discussed in Section 4.8.5.1, the CAP would be consistent with the 2017 Scoping Plan GHG emission reduction targets. The GHG emission targets established in the proposed CAP are based on the goals established by EO S-3-15 and SB 32, consistent with the CAP guidelines established in the 2017 Scoping Plan. The CAP would achieve additional longer-term GHG reductions that would contribute towards achievement of the State's long-term 2050 goal. It is not currently possible for the CAP to demonstrate how a local 2050 goal can be achieved because the City does not have jurisdictional control over all activities or emissions sources over all post-2040 activities or sources of emissions. However, the CAP includes specific implementation and monitoring procedures that require the City to achieve increasingly-effective long-term reductions over time and demonstrate substantial progress on the pathway towards the long-term 2050 goal. As discussed in the Implementation, Monitoring, and Reporting chapter of the CAP, the City would identify new or modified local measures to complement future State actions needed to achieve the state's 2050 goal through future CAP updates. Moreover, the City would update the CAP following specific State actions, such as future updates to the Scoping Plan or new interim post-2030 targets, which would be needed to demonstrate how achievement of the State's longer-term 2050 goal would be feasible and, in turn, the role of local government agencies in complementing the State's regulatory actions. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. This impact would be less than significant.

#### **4.8.6 Cumulative Analysis**

The issue of global climate change is inherently a cumulative issue, as GHG emissions of individual projects cannot be shown to have a material effect on global climate change. Impacts would be cumulative in nature if they lead to a substantial increase in GHG emissions, when combined with other development. As discussed, the framework for assessing GHG emissions in the state has been created through AB 32, SB 32, EO S-3-05, and the 2017 Scoping Plan. If a project demonstrates that it is sufficiently reducing its overall GHG emissions consistent with statewide goals, the project's impact can be determined not to be cumulatively considerable as it would contribute to the State's GHG emission reduction targets. As discussed in Section 4.8.5.1 above, with implementation of the CAP, the City

would reduce its GHG emissions consistent with the 2017 Scoping Plan GHG emission reduction targets. The City would update GHG inventories, evaluate the performance of individual strategies, evaluate progress toward the City's reduction targets, and make revisions to strategies, as necessary, to ensure that the City will achieve its targets. Therefore, implementation of the CAP would ensure that the project would not contribute to a cumulative impact related to GHG.

### **4.8.7 Significance of Impacts before Mitigation**

The proposed CAP identifies strategies, measures, and actions that would be implemented to reduce GHG emissions consistent with State legislative requirements. Therefore, with the adoption and implementation of the proposed CAP, GHG emissions generated by the 2021 GPU would be reduced to meet State GHG reduction targets. Therefore, the project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs, and impacts would be less than significant.

### **4.8.8 Mitigation**

Impacts would be less than significant. No mitigation is required.

### **4.8.9 Significance of Impacts after Mitigation**

Impacts would be less than significant. No mitigation is required.

## **4.9 Hazards and Hazardous Materials**

This section analyzes potentially significant impacts related to hazards and hazardous materials that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the entire city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area. This analysis relies on secondary source information including but not limited to federal, regional, and city planning documents, and hazardous material databases.

### **4.9.1 Existing Conditions**

#### **4.9.1.1 Emergency Response**

The Moreno Valley Emergency Operations Plan (2009) establishes a comprehensive, all-hazards approach to natural, man-made and technological disasters. The plan states the Moreno Valley Fire Department (MVFD) as the primary response agency for fires, emergency medical service, hazardous materials incidents, traffic accidents, terrorist acts, catastrophic weather events, and technical rescues throughout the Planning Area. The MVFD also provides a full range of fire prevention services including public education, code enforcement, plan check and inspection services for new and existing construction, and fire investigation. Additionally, the City's Office of Emergency Management is located within the fire department allowing for coordinated responses to both natural and human-made disasters. The MVFD is part of the California Department of Forestry and Fire Protection (CAL FIRE)/Riverside County Fire Department's regional, integrated, cooperative fire protection organization.

#### **4.9.1.2 Hazardous Materials**

Hazardous materials are used throughout the Planning Area for a variety of purposes including manufacturing, service industries, various small businesses, agriculture, medical uses, schools, and households. Accidents can occur in the production, use, transport, and disposal of these hazardous materials. The probability of accidental spills is accentuated by the fact that the region is susceptible to earthquakes.

#### **4.9.1.3 Hazardous Materials Sites**

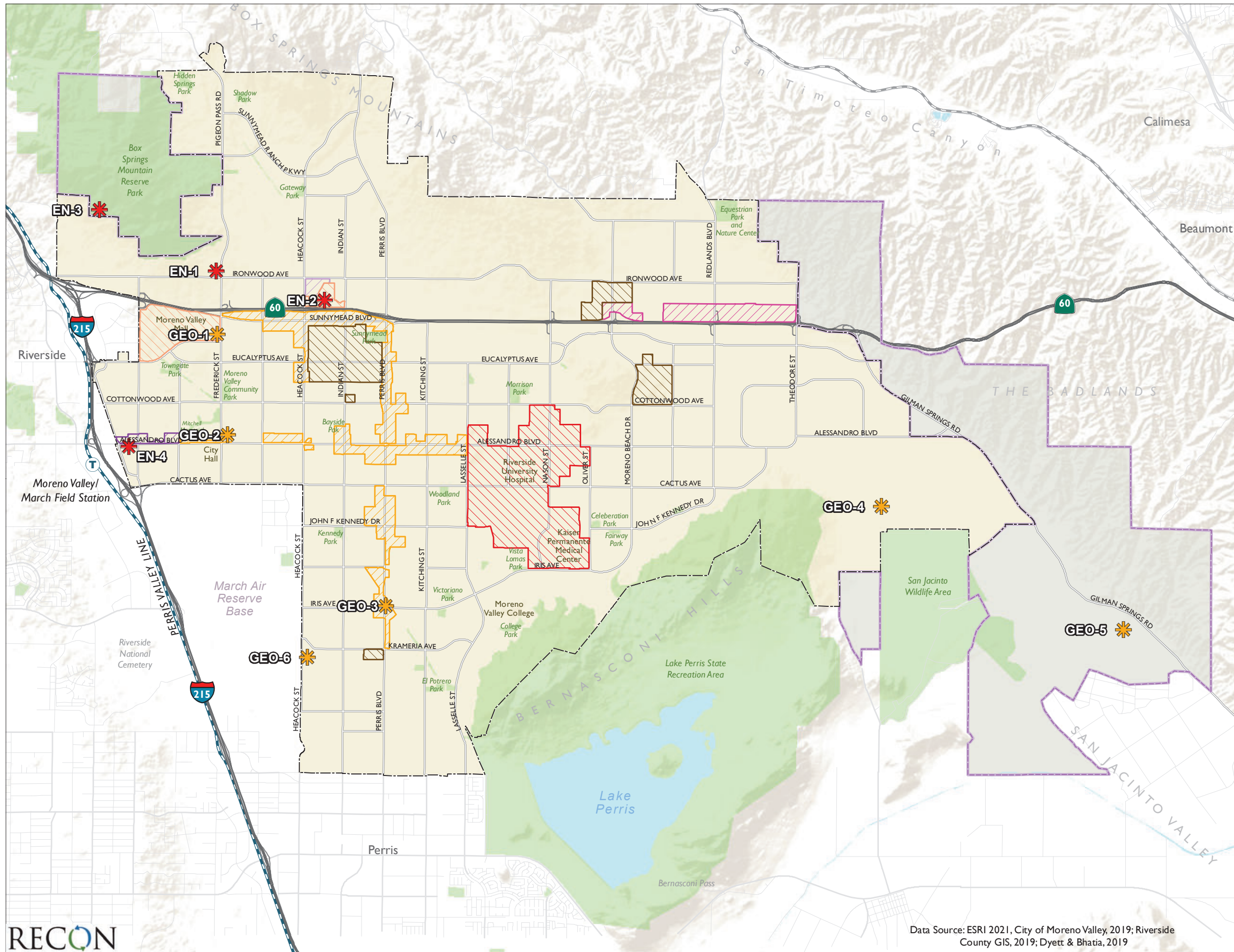
The Hazardous Waste and Substances Sites (Cortese) List is a planning document that provides information about the location of hazardous materials release sites in the state. Government Code Section 65962.5 requires the California Environmental Protection Agency

(CalEPA) to develop, at least annually, an updated Cortese List. The California Department of Toxic Substances Control (DTSC) is responsible for a portion of the information contained in the Cortese List that is contained in their Envirostor database (2019).

The other main source of information for sites in the Cortese List is the California State Water Resources Control Board's (State Water Board) Geotracker Database (Geotracker; 2021). "Geotracker" is the State Water Board's Internet-accessible database system used by the state board, regional boards, and local agencies to track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks. This system consists of a relational database, online compliance reporting features, a geographical information system (GIS) interface, and other features that are utilized by the state0020board, regional boards, local agencies, regulated industry and the public to input, manage, or access compliance and regulatory tracking data.

Figure 4.9-1 depicts the location of active Envirostor and Geotracker hazardous materials sites. As shown on Figure 4.9-1, there are four active Envirostor sites and six active Geotracker hazardous materials sites within the Planning Area. Table 4.9-1 lists each site location and describes the site listing.

The majority of active sites involve dry cleaners and gas stations. GEO-4 consists of groundwater monitoring of a San Diego Gas & Electric site. At this time, there are no indications of impacts to groundwater beneath the site. GEO-6 involves the cleanup of substances/contaminants of concern within an off-site groundwater plume associated with March Air Reserve Base/Inland Port Airport (MARB/IPA) located within the Planning Area. These include benzene, chlorinated hydrocarbons, tetrachloroethylene (PCE), and trichloroethylene (TCE) within the aquifer used for drinking water. Issuance of an Annual Groundwater Monitoring Report on the MARB site began in 1996. Monitoring wells have been added to the monitoring network over time as required and decommissioned as appropriately. Cleanup of the groundwater plume is the responsibility of MARB/IPA.



- City of Moreno Valley
- Sphere of Influence
- \* EnviroStor Cleanup Sites
- \* GeoTracker Sites
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes



**FIGURE 4.9-1**  
Hazardous Materials Sites

<b>Table 4.9-1</b>		
<b>Active Envirostor and Geotracker Hazardous Materials Sites</b>		
Sites	Description	Location
<b>Envirostor</b>		
EN-1 Best Cleaners	Site Type: Voluntary Cleanup Status: Active	11875 Pigeon Pass Road Moreno Valley, CA 92557
EN-2 The Festival in Moreno Valley	Site Type: Voluntary Cleanup Status: Inactive, Action Required	24318 Hemlock Avenue Moreno Valley, CA 92557
EN-3 March Air Reserve Base Rifle Range	Status: Inactive - Needs Evaluation	No Address Given
EN-4 Alessandro Properties	Site Type: Voluntary Cleanup Status: Active	14044 Old 215 Frontage Road, 21839 Alessandro Boulevard, and 21921 Alessandro Boulevard Moreno Valley, CA 92553
<b>Geotracker Sites</b>		
GEO-1 Towngate Cleaners	Cleanup Status: Open – Site Assessment Loc Case #: 60001956	12625 Frederick Street Moreno Valley, CA 92553
GEO-2 M&M Dry Cleaners	Cleanup Status: Open - Remediation RB Case #: 2080099	23080 Alessandro Blvd. Unit 220 Moreno Valley, CA 92553
GEO-3 Shell Perris Boulevard	Cleanup Status: Open - Verification Monitoring Loc Case #: 200420313	15980 Perris Boulevard Moreno Valley, CA 92551
GEO-4 San Diego Gas & Electric	Cleanup Status: Open – Operating Regional Board Case #: 8 332020001	14601 Virginia Moreno Valley, CA 92555
GEO-5 Recycled Wood Products (RWP) Moreno Valley	Case #: 8 332875001	34005 Gilman Springs Drive Moreno Valley, CA 92583
GEO-6 Off-Base Groundwater Plume	Cleanup Status: Open - Remediation RB Case #: 166-72 -- 23 Loc Case #: 400090 -- 23	Heacock Street Riverside CA, 92518

#### 4.9.1.4 Airport Hazards

The Riverside County Airport Land Use Commission adopts plans to protect and promote the safety and welfare of airport users and residents in the airport vicinity. Specifically, these plans seek to protect the public from the adverse effects of aircraft noise, to ensure that people and facilities are not concentrated in areas susceptible to aircraft accidents, and to ensure that no structures or activities encroach upon or adversely affect the use of navigable airspace.

##### a. March Air Reserve Base/Inland Port Airport

The compatibility zones and associated criteria set forth in the MARB/IPA Compatibility Plan provide noise and safety compatibility protection equivalent to or greater than the U.S. Air Force recommended criteria presented in the Air Installation Compatibility Use Zones

(AICUZ) study. Figure 4.9-2 shows a map of the compatibility zones and Figure 4.9-3 explains the necessary factors for each compatibility zone.

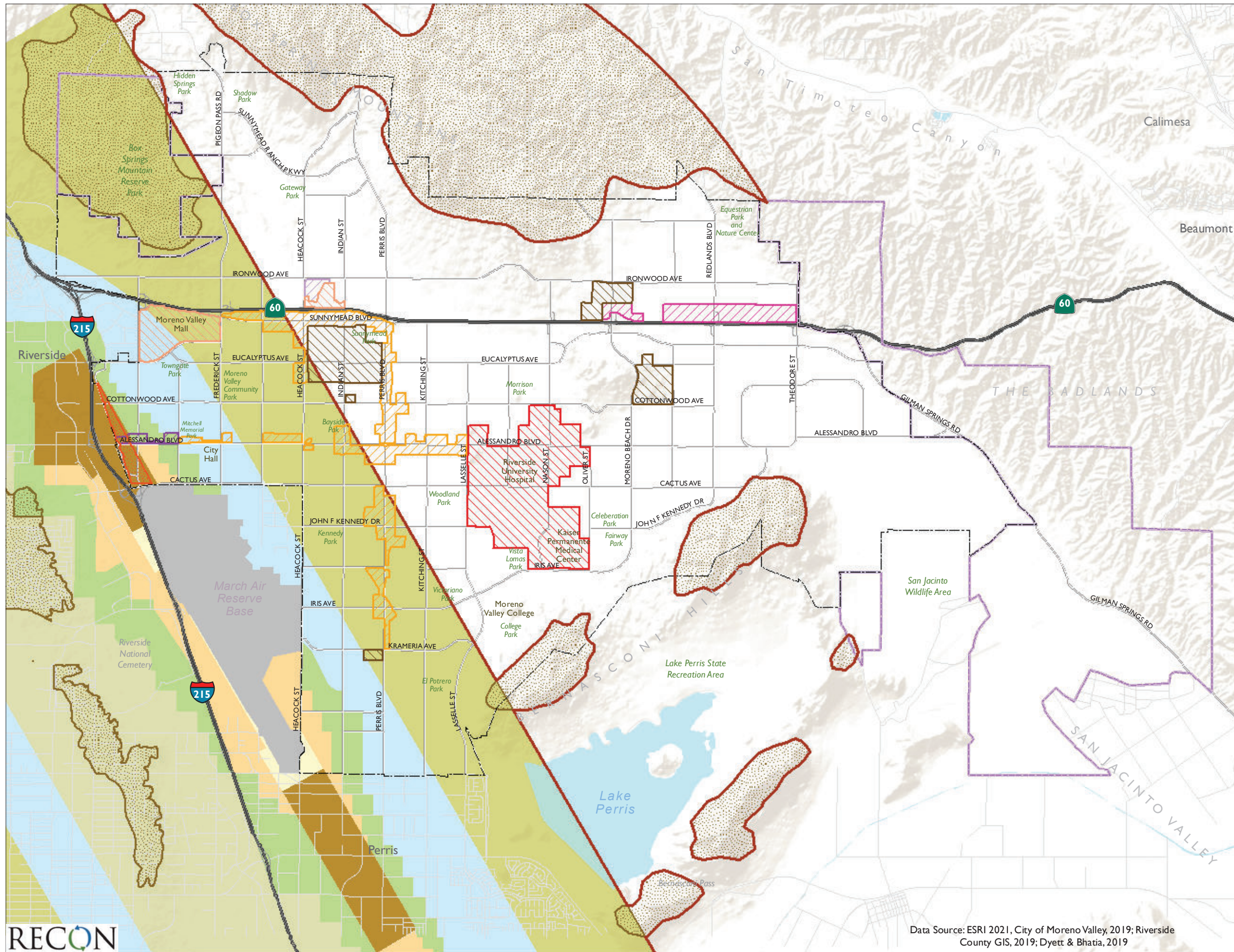
#### **4.9.1.5 Transportation of Hazardous Materials**

Hazardous materials pass through the Planning Area via the freeway, rail, and surface street system. Interstate 215 (I-215) is near the western boundary of the city limits. The nearest railway is the Burlington Northern and Santa Fe railway which runs parallel to I-215. While train derailment can occur at anytime, it is during an earthquake that a derailment and hazardous materials release would pose the greatest risk. The major automotive transportation routes through the city include State Route 60 (SR-60), Alessandro Boulevard, Perris Boulevard, and Cactus Avenue.

The city has no direct authority to regulate the transport of hazardous materials on state highways or rail lines. Transportation of hazardous materials by truck and rail is regulated by the U.S. Department of Transportation (DOT). DOT regulations establish criteria for safe handling procedures. Federal safety standards are also included in the California Administrative Code. The California Health Services Department regulates the haulers of hazardous waste (City of Moreno Valley 2006b).

#### **4.9.1.6 Pipeline Hazards**

The Planning Area has a history of pipeline ruptures, spillage, and vandalism to natural gas and sewer lines. According to the City's Local Hazard Mitigation Plan (LHMP; 2017), the probability for this hazard is a 2, which means that there is between a 1 percent and 10 percent chance that it will occur within the next year. The severity rating for this hazard is a 2, which means that there is a potential for limited damage, causing injuries and/or illnesses, complete shutdown of critical facilities for more than one week and/or 10 percent of property is severely damaged. Pipeline incidents could cause cascading hazards such as flooding, transportation and hazardous materials incidents, civil unrest, and pandemic flu or disease.



- City of Moreno Valley
- Sphere of Influence
- Airport Influence Area Boundary
- Airport Compatibility Zones**
- Zone A
- Zone B1
- Zone B2
- Zone C1
- Zone C2
- Zone D
- Zone E
- Zone M
- High Terrain Zones
- AICUZ
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes



FIGURE 4.9-2

Airport Compatibility Zones




Zone	Noise and Overflight Factors	Safety and Airspace Protection Factors
<b>M</b> (Military)	<i>Federal Lands</i> ▶ No ALUC authority	<i>Federal Lands</i> ▶ No ALUC authority
<b>A</b> Clear Zone (if not on base)	<i>Noise Impact: Very High</i> ▶ High CNEL and single-event noise levels	<i>Risk Level: Very High</i> ▶ Dimensions set to include Clear Zone as indicated in Air Installation Compatible Use Zone (AICUZ) study for airport ▶ Generally on air base property or controlled by easements
<b>B1</b> Inner Approach/Departure Zone	<i>Noise Impact: High</i> ▶ Within or near 65-CNEL contour ▶ Single-event noise sufficient to disrupt many land use activities including indoors if windows open	<i>Risk Level: High</i> ▶ Within Accident Potential Zone I or II ▶ Additionally, zone boundary to north reflects turning flight tracks
<b>B2</b> High Noise Zone	<i>Noise Impact: High</i> ▶ Within or near 65-CNEL contour ▶ Single-event noise sufficient to disrupt many land use activities including indoors if windows open	<i>Risk Level: Moderate</i> ▶ Beneath or adjacent to final approach and initial departure flight corridors or adjacent to runway ▶ Not within Accident Potential Zones
<b>C1</b> Primary Approach/Departure Zone	<i>Noise Impact: Moderate to High</i> ▶ Within or near 60-CNEL contour ▶ Single-event noise may be disruptive to noise-sensitive land use activities; aircraft <2,000 feet above runway elevation on arrival and generally <3,000 feet above runway elevation on departure	<i>Risk Level: Moderate</i> ▶ Beneath or adjacent to low altitude overflight corridors
<b>C2</b> Flight Corridor Zone	<i>Noise Impact: Moderate</i> ▶ Within 60 CNEL contour, but more than 5 miles from runway end; or ▶ Outside 60-CNEL contour, but regularly overflow in mostly daytime flight training ▶ Single-event noise may be disruptive to noise-sensitive land use activities; aircraft <3,000 feet above runway elevation on arrival	<i>Risk Level: Moderate to Low</i> ▶ Distant (beyond 5 miles) portion of instrument arrival corridor; or ▶ Closed-circuit flight training activity corridors
<b>D</b> Flight Corridor Buffer	<i>Noise Impact: Moderate to Low</i> ▶ Mostly within 55-CNEL contour ▶ More concern with respect to individual loud events than with cumulative noise contours	<i>Risk Level: Low</i> ▶ On periphery of flight corridors ▶ Risk concern primarily with uses for which potential consequences are severe (e.g. very-high-intensity activities in a confined area)
<b>E</b> Other Airport Environs	<i>Noise Impact: Low</i> ▶ Beyond 55-CNEL contour ▶ Occasional overflights intrusive to some outdoor activities	<i>Risk Level: Low</i> ▶ Within outer or occasionally used portions of flight corridors
 High Terrain Zone	<i>Noise Impact: Low</i> ▶ Individual noise events slightly louder because high terrain reduces altitude of overflights	<i>Risk Level: Moderate</i> ▶ Moderate risk because high terrain constitutes air-space obstruction ▶ Concern is tall single objects (e.g., antennas)

FIGURE 4.9-3  
Compatibility Zone Factors

## **4.9.2 Applicable Regulatory Requirements**

### **4.9.2.1 Federal Regulations**

#### **a. Comprehensive Environmental Response, Compensation, and Liability Act**

Discovery of environmental health damage from disposal sites prompted the U.S. Congress to pass the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund). The purpose of the CERCLA is to identify and clean up chemically contaminated sites that pose a significant environmental health threat. The Hazard Ranking System is used to determine whether a site should be placed on the National Priorities List for cleanup activities.

#### **b. Superfund Amendments and Reauthorization Act**

The Superfund Amendments and Reauthorization Act (SARA) pertain primarily to emergency management of accidental releases. It requires formation of state and local emergency planning committees, which are responsible for collecting, material handling, and transportation data for use as a basis for planning. Chemical inventory data are made available to the community at large under the “right-to-know” provision of the law. In addition, SARA also requires annual reporting of continuous emissions and accidental releases of specified compounds. These annual submissions are compiled into a nationwide Toxics Release Inventory (TRI).

#### **c. Resource Conservation and Recovery Act**

The Resource Conservation and Recovery Act (RCRA) Subtitle C addresses hazardous waste generation, handling, transportation, storage, treatment, and disposal. It includes requirements for a system that uses hazardous waste manifests to track the movement of waste from its site of generation to its ultimate disposition. The 1984 amendments to the RCRA created a national priority for waste minimization. Subtitle D establishes national minimum requirements for solid waste disposal sites and practices. It requires states to develop plans for the management of wastes within their jurisdictions. Subtitle I requires monitoring and containment systems for underground storage tanks that hold hazardous materials. Owners of tanks must demonstrate financial assurance for the cleanup of a potential leaking tank.

#### **d. Hazardous Materials Transportation Act**

The Hazardous Materials Transportation Act is the statutory basis for the extensive body of regulations aimed at ensuring the safe transport of hazardous materials on water, rail, highways, in the sky, or in pipelines. It includes provisions for materials classification, packaging, marking, labeling, placarding, and shipping documentation.

## 4.9.2.2 State Regulations

### a. California Code of Regulations

Most state and federal regulations and requirements that apply to generators of hazardous waste are spelled out in California Code of Regulations (CCR), Title 22, Division 4.5. Title 22 contains the detailed compliance requirements for hazardous waste generators, transporters, treatment, storage, and disposal facilities. Because California is a fully authorized state according to RCRA, most RCRA regulations (those contained in 40 Code of Federal Regulations [CFR] 260, et seq.) have been duplicated and integrated into Title 22. However, because the DTSC regulates hazardous waste more stringently than the U.S. Environmental Protection Agency (EPA), the integration of California and federal hazardous waste regulations that make up Title 22 do not contain as many exemptions or exclusions as does 40 CFR 260. As with the California Health and Safety Code, Title 22 also regulates a wider range of waste types and waste management activities than do the RCRA regulations in 40 CFR 260. To aid the regulated community, California compiled the hazardous materials, waste and toxics-related regulations contained in CCR, Titles 3, 8, 13, 17, 19, 22, 23, 24, and 27 into one consolidated CCR, Title 26 “Toxics.” However, the California hazardous waste regulations are still commonly referred to as Title 22. For the purposes of clarity, because of the extensive reach of Title 22 and Title 26, many common household products sold in grocery stores and home improvement warehouses qualify as hazardous materials. These items include household cleaners, detergents, paint, motor oil, lubricants, glues, pesticides, etc. The term “hazardous materials” is also defined to include many on-site materials as well, such as lubricants, fuel, etc.

### b. Cortese List: Section 65962.5(a)

Government Code Section 65962.5 requires the CalEPA to develop, at least annually, an updated Hazardous Waste and Substances Sites list (Cortese List). The Cortese List is a planning document used by the state, local agencies, and developers to comply with California Environmental Quality Act (CEQA) requirements in providing information about the location of hazardous materials release sites. Release sites include or hazardous materials release sites may include the following:

- All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.
- All land designated as hazardous waste property or border zone property pursuant to Article 11 (commencing with Section 25220) of Chapter 6.5 of Division 20 of the Health and Safety Code.
- All information received by the DTSC pursuant to Section 25242 of the Health and Safety Code on hazardous waste disposals on public land.
- All sites listed pursuant to Section 25356 of the Health and Safety Code.
- All sites included in the Abandoned Site Assessment Program.

The California DTSC is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

### **c. The California Hazardous Material Management Act**

The Hazardous Materials Management Act (HMMA) requires that businesses handling or storing certain amounts of hazardous materials prepare a Hazardous Materials Business Emergency Plan (HMBEP), which includes an inventory of hazardous materials stored on-site (above specified quantities), an emergency response plan, and an employee training program. An HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is to satisfy federal and state community right-to-know laws and to provide detailed information for use by emergency responders.

Per the California Health and Safety Code, Chapter 6.95, Section 25500–25532, an HMBEP must be submitted by any business that handles a hazardous material or a mixture containing a hazardous material in quantities equal to, or greater than:

- A total weight of 500 pounds or a total volume of 55 gallons;
- 200 cubic feet of a compressed gas at standard temperature and pressure; and/or
- A radioactive material handled in quantities for which an emergency plan is required pursuant to Parts 30, 40, or 70 of Chapter 10, Title 10, CFR, or equal to or greater than the amounts specified above, whichever amount is less.

An HMBEP must be prepared prior to facility operation. Any business subject to HMBEP requirements shall submit an amendment of its HMBEP to the local implementing agency when there is:

- A 100 percent or more increase in the quantity of a previously disclosed hazardous material;
- Any handling of a previously undisclosed hazardous material subject to the inventory requirements;
- Change of business address;
- Change of ownership;
- Change of business name; and/or
- Change of contact information.

In addition, any business subject to HMBEP requirements is also required to certify the inventory of hazardous materials handled at the business every year. Businesses are also required to review their HMBEP at least once every three years to determine if a revision is

necessary. Once the review has been conducted, the business must certify in writing to the local implementing agency that a review has been completed and necessary changes were made. For businesses within the city, HMBEPs are submitted to and approved by the County of Riverside Community Health Agency, Department of Environmental Health.

#### **d. The California Hazardous Waste Control Law**

The Hazardous Waste Control Law (HWCL) is the primary hazardous waste statute in the state of California. The HWCL requires a hazardous waste generator, which stores or accumulates hazardous waste for periods greater than 90 days at an on-site facility or for periods greater than 144 hours at an off-site or transfer facility, which treats, or transports hazardous waste, to obtain a permit to conduct such activities. The HWCL implements RCRA as a “cradle-to-grave” waste management system in the state of California. HWCL specifies that generators have the primary duty to determine whether their wastes are hazardous and to ensure their proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous wastes used or reused as raw materials. The HWCL exceeds federal requirements by mandating source reduction planning and a much broader requirement for permitting facilities that treat hazardous waste. It also regulates the number of types of wastes and waste management activities that are not covered by federal law with RCRA.

#### **e. State Aeronautics Act (Public Utilities Code Section 21670, et seq.)**

The Public Utilities Code establishes the requirement for the creation of airport land use commissions for every county in which there is located an airport that is served by a scheduled airline. Additionally, these sections of the Public Utilities Code mandate the preparation of Comprehensive Land Use Plans (CLUP) to provide for the orderly growth of each public airport and the area surrounding the airport. The purpose of CLUPs includes the protection of the general welfare of inhabitants within the vicinity of the airport and the general public.

#### **f. California Emergency Services Act**

Government Code 8550–8692 provides for the assignment of functions to be performed by various agencies during an emergency so that the most effective use may be made of all manpower, resources, and facilities for dealing with any emergency that may occur. The coordination of all emergency services is recognized by the state to mitigate the effects of natural, manmade, or war-caused emergencies which result in conditions of disaster or extreme peril to life, property, and the resources of the state, and generally, to protect the health and safety and preserve the lives and property of the people of the state.

#### **g. State Fire Plan**

The state Board of Forestry and the California Department of Forestry and Fire Protection have drafted a comprehensive update of the State Fire Plan for wildland fire protection in California. The planning process defines a level of service measurement, considers assets at risk, incorporates the cooperative interdependent relationships of wildland fire protection

providers, provides for public stakeholder involvement, and creates a fiscal framework for policy analysis.

### **4.9.2.3 Regional Regulations**

#### **a. Riverside County Area Plan**

The County of Riverside, Health Services Agency, Department of Environmental Health, Hazardous Materials Division established the Riverside County Area Plan based on requirements of Chapter 6.95 of the California Health and Safety Code, Title 19 of the CCR and the U.S. EPA SARA Title III for emergency response to a release or threatened release of a hazardous material within the county. The Hazardous Materials Program and Response Plan contained in the Riverside County Area Plan serves the majority of the cities in Riverside County, including Moreno Valley.

As part of the Riverside County Area Plan, the federal Risk Management Plan (RMP), as incorporated and modified by the State of California Accidental Release Prevention (CalARP) Program, is designed to prevent harm to people and the surrounding environment by the use of various organized systems to identify and manage hazards. The goal of the CalARP Program is to make all facilities that handle regulated substances free of catastrophic incidents.

Any stationary source (business) that exceeds the threshold quantities of regulated substances shall submit a RMP under the CalARP Program. A Business Emergency Plan (BEP) must be submitted by all businesses that handle hazardous materials over a designated threshold quantity. Upon completion of a BEP, the BEP is submitted to Moreno Valley's local Certified Unified Program Agency (CUPA). The CUPA with responsibility for the city is the County of Riverside Health Department, Environmental Health Division. A BEP contains vital information that may be utilized to minimize the effects and extent of a threatened release of hazardous materials. In addition, this information allows emergency response personnel to determine potential risks and hazards while developing a strategy for handling an emergency involving hazardous materials. Annually submitted RMPs are currently reviewed by the County Environmental Health Division.

If a hazardous materials emergency occurred within the city, the first response would be from the MVFD and from the CAL FIRE/Riverside County Fire Department Hazardous Materials Response Team (HMERT). The HMERT is stationed at the Beaumont Fire Station 20 in Beaumont.

#### ***Riverside County Airport Land Use Plan***

The Riverside County Airport Land Use Commission (ALUC) assists local agencies by ensuring the development of compatible land uses in the vicinity of existing airports. Beginning in 2004, the Riverside County ALUC began adopting new versions of the airport land use compatibility plan (ALUCPs) for most Riverside County airports that are contained within a single, countywide document entitled Riverside County ALUCP. The ALUCP for each airport consists of the policies in Chapter 2 of that document that are applicable to all

of the airports in the County together with the airport-specific policies and maps contained within individual airport ALUCPs.

### ***March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan***

The MARB/IPA Land Use Compatibility Plan (2014) was adopted by the Riverside County ALUC on November 13, 2014. The plan is primarily based on the U.S. Air Force's AICUZ dated August 2005. The compatibility zones and associated criteria set forth in the March ARB/IPA Land Use Compatibility Plan provide noise and safety compatibility protection equivalent or greater than the U.S. Air Force recommended criteria presented in the AICUZ.

### ***Air Installation Compatible Use Zone Study***

MARB/IPA is a joint-use airport, used for both military and civilian purposes. The airport is owned and regulated by the military. Military installations prepare AICUZ studies to protect vicinity land uses from hazard and noise impacts associated with military airports. The Air Force Reserve completed a new AICUZ study in 2018 for the MARB as an update of the AICUZ study completed in 2005. The AICUZ delineates the clear zones and accident potential zones for the joint use airfield, as well as the noise contours based upon the project flight operations and use of the aviation field. The noise contours include both military and civilian use, as projected in the Federal Aviation Administration (FAA) conformity determination.

## **4.9.2.4 Local Regulations**

### **a. Local Hazard Mitigation Plan**

The City's LHMP (2017) is designed to identify the city's hazards, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term natural or man-made hazard risks to human life and property for the city and its residents. The 2017 LHMP is an update to Moreno Valley's 2011 LHMP which the Moreno Valley City Council adopted on October 25, 2011 (Resolution No. 2011-102).

### **b. Emergency Operations Plan**

The purpose of the City's Emergency Operations Plan (2009) is to establish a comprehensive, all-hazards approach to natural, man-made and technological disasters. The plan provides an overview of operational concepts; identifies the components of the City's Emergency Management Organization; and describes overall responsibilities of federal, state, and local agencies. Overall, the plan establishes a system for coordinating the prevention, preparedness, response, recovery and mitigation phases of emergency management in the city.

### **c. City of Moreno Valley Municipal Code**

Title 8 of the City of Moreno Valley Municipal Code contains Chapter 8.36 California Fire Code which states that except as expressly excluded, the California Fire Code is adopted by the city. Section 8.36.050 provides fuel modification requirements for new construction.

Title 9 of the Municipal Code contains Chapter 9.07 Special Districts which addresses development's compatibility with the city's AICUZ. The AICUZ overlay district applies along the southwestern boundary of the Planning Area, adjacent to MARB. Development within the AICUZ is subject to specific development standards. Specifically, development within the AICUZ overlay district "shall avoid uses which concentrate large numbers of people; are noise sensitive; create hazards to aircraft operations; pose special health and safety hazards in the event of an aircraft accident; or involve public facilities and utilities for which disruption would have an adverse impact on large numbers of people" (Municipal Code Section 9.07.060(E)(1)).

### **4.9.3 Methodologies for Determining Impacts**

The potential for significant hazards and hazardous materials impacts associated with the project has been evaluated based upon review of existing secondary source information and data relative to hazardous or potentially hazardous materials within the Planning Area.

### **4.9.4 Basis for Determining Significance**

Thresholds used to evaluate impacts related to hazards and hazardous materials are based on applicable criteria in the CEQA Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact related to hazards and hazardous materials would occur if the project would:

- 1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 2) 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;
- 3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- 4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment;
- 5) Be 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, result in a safety hazard or excessive noise for people residing or working in the project area;
- 6) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- 7) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.



## 4.9.5 Impact Analysis

### 4.9.5.1 Topic 1: Transport, Use, or Disposal of Hazardous Materials

*Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Hazardous materials are any substance or combination of substances that may pose a risk to human health and safety or to the environment. Hazardous materials include toxic, corrosive, infectious, flammable, explosive and radioactive materials. Businesses, public or private institutions and private households all use or generate hazardous materials to some extent. Hazardous materials are routinely manufactured, used, stored or transported in nearly every community and therefore risk of upset or discharge could occur within the Planning Area.

The city has no direct authority to regulate the transport of hazardous materials on state highways. This activity is governed by the U.S. DOT, as described in Title 49 of the CFR and by Title 13 of the CCRs. The state Office of Hazardous Materials Safety enforces regulations for the safe transportation of hazardous materials. New development or redevelopment under the project could result in the need to transport hazardous materials to and from a specific project site. Future projects would be required to ascertain appropriate documentation for all hazardous waste that is transported in connection with project site activities and would be provided as required by hazardous materials regulations. Hazardous waste produced on-site would be subject to regulatory requirements associated with accumulation, time limits, proper storage locations and containers, and proper labeling. Additionally, for removal of hazardous waste from a particular site, hazardous waste generators would be required to use a certified hazardous waste transportation company, which must ship hazardous waste to a permitted facility for treatment, storage, recycling, or disposal. Specifically, the California Hazardous Materials Management Act requires that businesses handling or storing certain amounts of hazardous materials prepare a Hazardous Materials Business Emergency Plan, which includes an inventory of hazardous materials stored on site (above specified quantities), an emergency response plan, and an employee training program. Additionally, future development would be required to adhere to the following goals and policies included in the 2021 GPU Safety Element related to hazardous materials.

#### ***Goal***

S-1: Protect life and property from natural and human made hazards.

#### ***Policies***

S.1.33 Continue to require remediation of hazardous material releases from previous land uses as part of any redevelopment activities.

S.1.34 Regulate development on sites with known contamination of soil or groundwater to ensure that construction workers, future occupants, adjacent residents, and the

environment are adequately protected from hazards associated with contamination.

- S.1-35 Consistent with State regulations, require proper storage and disposal of hazardous materials to reduce the likelihood of leakage, explosions, or fire, and to properly contain potential spills from leaving the site.

### ***Emergency Response***

The 2021 GPU provides an overarching framework for addressing hazardous materials within the Planning Area. The 2021 GPU Safety Element contains the following goals, policies, and actions:

Therefore, adherence with applicable federal, state, regional, and local plans and regulations, as well as 2021 GPU policies would ensure that the project would not result in potential hazards associated with the use, transport, storage, and sale of hazardous materials, and impacts would be less than significant.

#### **4.9.5.2 Topic 2: Accidental Release of Hazardous Materials**

*Would the project 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?*

Implementation of the project would result in an increase in residential units and an increase in business park, industrial, office, commercial, and civic and institutional uses throughout the Planning Area, particularly within the Concept Areas (see Figure 3-1). As noted above, implementation of the project could increase the use and transport of hazardous materials throughout the Planning Area, which could in turn, increase the potential for accidental releases of hazardous materials, which poses a threat to the health and safety of residents. Accidental releases would most likely occur in the commercial and industrial areas and along transportation routes leading to and from these areas. The major transportation corridors in the Planning Area include I-215 and SR-60. Along these roads, as well as in proximity to the Moreno Valley Industrial Area, are where most of the businesses that are likely to use, transport, dispose of, or create hazardous materials are located.

In addition to potential accidents during transport, accidental release of hazardous materials could result from leaking underground storage tanks, accidents causing a “spill” of a hazardous materials, and/or natural disasters causing the unauthorized release of a substance. If not cleaned up immediately and completely, accidental release of hazardous materials could cause contamination of soil, surface water and groundwater, in addition to any toxic fumes that might be generated. Depending on the nature and extent of the contamination, groundwater supplies could become unsuitable for use as a domestic water source. Human exposure to contaminated soil or water could have potential health effects depending on a variety of factors, including the nature of the contaminant and the degree of exposure.

Future development and redevelopment projects implemented under the project would be required to adhere to applicable federal, state, regional, and local regulations focused on preventing release of hazardous materials. Specifically, any projects within the Planning Area that propose a stationary source (business) would be regulated by the Riverside County CalARP Program. Any proposed project that would exceed the threshold quantities of a regulated substance would be required to submit a RMP under the CalARP Program. Also, those proposed projects would be required to prepare a BEP which would be submitted to Moreno Valley's local CUPA. The CUPA with responsibility for the city is the County of Riverside Health Department, Environmental Health Division. The BEP would be required to contain all information necessary to ensure that the proposed business is taking those steps necessary to minimize the effects and extent of a threatened release of hazardous materials. In addition, this information would allow emergency response personnel to determine potential risks and hazards while developing a strategy for handling an emergency involving hazardous materials. Annually submitted RMPs are currently reviewed by the County Environmental Health Division.

If a hazardous materials emergency occurred within the Planning Area, the first response would be from the MVFD and CAL FIRE/Riverside County Fire Department HMERT. The HMERT is stationed at the Beaumont Fire Station 20. While there have been minimal disasters relating to hazardous material releases, the Emergency Operation Plan does recognize that due to the existence of many industrial business, the release of hazardous materials does pose a serious threat to the Planning Area (City of Moreno Valley 2009). Increases in industrial use as allowed under the 2021 GPU would further the potential threat. Oversight by the appropriate agencies and compliance with applicable regulations would ensure that risk are minimized. Additionally, future development would be required to adhere to the policies included in the 2021 GPU Safety Element, which includes policies that require both prevention and remediation of hazardous materials release. Therefore, adherence with applicable federal, state, regional, and local plans and regulations, as well as 2021 GPU policies would ensure that the project would not result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and impacts would be less than significant.

#### **4.9.5.3 Topic 3: Existing or Proposed Schools**

*Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Elementary, middle, and high schools are currently located within the Planning Area and could be located within a one-quarter mile of businesses utilizing, storing, or transporting hazardous materials. Implementation of the Concept Areas could result in an increase in business park uses within the Business Flex area; however, under the 2021 GPU, remaining areas throughout the city would develop consistent with the existing General Plan resulting in industrial uses placed in proximity to existing school sites.

As discussed above, all businesses which exceed the threshold quantities of a regulated substance would be required to submit a RMP and BEP under the CalARP Program. Each

BEP would include required information necessary to minimize potential release of hazardous materials. Therefore, adherence with applicable federal, state, regional, and local plans and regulations, as well as 2021 GPU policies, would ensure that the project would not result in an accidental release of hazardous materials or emissions of hazardous substance near existing or proposed schools, and impacts would be less than significant.

#### **4.9.5.4 Topic 4: Hazardous Materials Sites**

*Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?*

According to the Cortese List (DTSC, EnviroStor 2019), there are a total of 10 hazardous materials sites located throughout the Planning Area (see Figure 4.9-1 and Table 4.9-1). A number of these sites are located within the proposed Concept Areas (see Figure 3-1). In accordance with federal, state, regional, and local requirements, any new development or redevelopment that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted at such locations until a “no further action” clearance letter from the responsible agency. Therefore, adherence to applicable clean-up and/or remediation requirements and regulations would ensure that the project would not create a significant hazard associated with known hazardous materials sites, and impacts would be less than significant.

#### **4.9.5.5: Topic 5: Airport Hazards**

*Would the project be 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, result in a safety hazard or excessive noise for people residing or working in the project area?*

The nearest airport is MARB, located southwest of the Planning Area. The airfield is operated by two entities, March Air Reserve Base (military) and March Inland Port Airport Authority (quasi-governmental/private). In addition, Perris Valley Airport is located approximately nine miles south of the Planning Area. Perris Valley Airport is a private airport that is open to the public and is utilized for skydiving and ballooning activities. Therefore, implementation of the project could result in new residential uses within the airport safety zones.

The Riverside County ALUC has established compatibility zones. As shown in Figure 4.9-2, parts of the Planning Area are located within the airport compatibility zones B1-APZ II, C1, and D. Several of the proposed Concept Areas lie within these zones. The land use restrictions for each of the compatibility zones provides limitations to development to minimize potential incidents of off-airport accidents to persons and property on the ground. Safety and airspace protection factors that are applicable to each zone is shown in Figure 4.9-3. In addition, a single Concept Area allowing Business Flex is located within the city’s AICUZ.

**Goal**

- S-4: Minimize airport safety hazards and promote compatibility with airport operations.

**Policies**

- S.4-1 Limit hazards from flight operations in Moreno Valley through consistency with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (March ALUC Plan).
- S.4-2 Review all projects within the March Air Reserve Base/Inland Port Airport Influence Area for conformance with the compatibility criteria outlined in the March ALUC Plan.
- S.4-3 Minimize the potential for development adjacent to the March Air Reserve Base/Inland Port Airport to adversely affect airport operations such as by reducing the potential for bird strikes and electromagnetic interference.
- S.4-4 Coordinate with the March Air Reserve Base, the March Joint Powers Authority, and the March Inland Port Airport Authority to ensure that roadways are designed to safely accommodate airport vehicles and that airport-related traffic is routed to minimize hazards to or conflicts with Moreno Valley residents and businesses.
- S.4-5 Use education and practical ways of reducing exposure to electromagnetic fields (EMFs) near transmission lines and other sources.

**Actions**

- S.4-A Update applicable site development standards in the Development Code to incorporate measures for landscape design and maintenance on properties immediately adjacent to MARB, so as to reduce the potential for bird strikes. Standards should address planting palette, water features and maintenance practices.

Development within the AICUZ is subject to development standards and restrictions as set forth in Municipal Code Section 9.07.060. Future development that would be located within the city's special zone and/or within the ALUC compatibility zones would be required to adhere to all special regulations, including Municipal Code development standards and specific land use regulations regarding FAA notification imaginary surfaces, aircraft noise, and building heights. Consequently, the project would be consistent with adopted ALUCPs, as future development would be required to show compatibility with the requirements of the ALUCPs, the Municipal Code, and associated FAA requirements. Therefore, the project would not result in a safety hazard or excessive noise for people residing or working in the project area, and impacts would be less than significant.

### 4.9.5.6 Topic 6: Emergency Response

*Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The City adopted its LHMP on October 4, 2011 (revised 2017). The LHMP contains a map of emergency evacuation routes in the community that includes I-215, SR-60 and major roadways through the city. The evaluation network consists of 129 miles of roadway designated as potential evacuation routes in the event of disaster, including 34 bridges and 127 water crossings.

An analysis of development patterns and roadway connectivity indicates that some residential areas in the northern and southeastern portions of the city have constrained emergency access. These include developments in Sunnymead Ranch, Moreno Valley Ranch, and Hidden Springs. These are typically locations where residential development pre-dates incorporation into the City, and where homes are constructed on cul-de-sacs with a single point of connection to the municipal roadway network. Approval of new development in these areas would be conditioned on review by MVFD and the Moreno Valley Public Works Department to ensure adequate emergency access. Additionally, the 2021 GPU includes policies that provide for use of the City's early warning notification system to proactively alert residents of areas with constrained access in the event of a disaster requiring emergency evacuation.

Evacuation times could be improved with the implementation of technological and design strategies. For example, where appropriate, the use of painted medians instead of raised medians on roadways in areas of highest risk would effectively allow for reversible lanes that create additional outbound capacity. Application of this strategy would approximately double evacuation capacity in the northwestern portion of the city. Further, remote control of signal timing from the City's Traffic Management Center (TMC) allows for real-time modifications to signal timing that can speed evacuation in the event of emergency. Approximately half of the traffic signals in the city are currently connected to the TMC, and the 2021 GPU provides for the implementation of this technology in vulnerable areas as a priority going forward. The 2021 GPU also includes policies that provide for exploration of additional actions to facilitate emergency evacuation, including the study of improved roadway connections, including Morton Road/Gernert Road in unincorporated Riverside County to the west of Moreno Valley.

Future development would be designed, constructed, and maintained in accordance with applicable standards associated with the LHMP, including vehicular access to ensure that adequate emergency access and evacuation would be maintained. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. Moreover, future development would be required to adhere to the policies included in the 2021 GPU Safety Element, which includes the goal to provide effective response to disasters and emergencies, as well as emergency evacuation.

**Goal**

S-2: Provide effective response to disasters and emergencies.

**Policies**

- S.2-1 Use the adopted Local Hazard Mitigation Plan and Emergency Operations Plan to guide actions and investments for emergency preparedness and response.
- S.2-2 Maintain area-wide mutual aid agreements and communication links with partner agencies and other participating jurisdictions.
- S.2-3 Locate critical facilities, such as hospitals and health care facilities, emergency shelters, fire stations, police stations, emergency command centers, and other emergency service facilities and utilities so as to minimize exposure to flooding, seismic, geologic, wildfire, and other hazards.
- S.2-4 Maintain and periodically update the Emergency Operations Plan to effectively prepare for, respond to, recover from, and mitigate the effects of natural or human caused disasters that require the planned, coordinated response of multiple agencies or jurisdictions.
- S.2-5 Partner with Caltrans and neighboring jurisdictions on measures to protect critical evacuation routes such as SR-60 and I-215 and work with local agencies to develop contingency plans for operations when these and other roads are inoperable due to flooding or wildfire.
- S.2-A Where possible, avoid the installation of raised and planted medians in areas shown on Map S-6. The use of painted medians in these areas will allow for reversible lanes that create additional outbound capacity to facilitate emergency evacuation.
- S.2-6 Continue to engage the Police and Fire departments in the development review process to ensure that projects are designed and operated in a manner that minimizes the potential for criminal activity and fire hazards and maximizes the potential for responsive police and fire services.
- S.2-7 Promote a greater community awareness and understanding of natural and humanmade hazards and steps that can be taken to reduce personal risk by:
- Continuing FEMA Community Emergency Response Team Training to educate volunteers about disaster preparedness and train them in basic disaster response skills, such as fire safety, light search and rescue, team organization, and disaster medical operations.
  - Providing emergency preparedness presentations to service clubs, homeowner's associations and other organizations to enhance preparedness.

S.2-8 Minimize risk and threat of infection or disease by encouraging and promoting participation in annual/seasonal immunization efforts.

**Actions**

S.2-C Provide information on major evacuation routes and notification systems used for emergency alerts to residents and businesses in Moreno Valley.

S.2-D Use the early warning notification system to notify residents by phone, text, or email of the need to evacuate in the event of emergency and the location of evacuation centers, particularly residents of vulnerable areas and neighborhoods with constrained emergency access.

S.2-E Prioritize the connection of traffic signals in areas shown on Map S-7 to the City's Traffic Management Center to allow for real-time modifications to signal timing that can speed evacuation in the event of emergency.

S.2.F Work with Riverside County, railroad operators, and other emergency response agencies to address disconnected routes and explore roadway improvements that can provide better emergency access under emergency evacuation scenarios.

S.2.G Evaluate options for ensuring emergency power at critical and community facilities, including microgrids, solar capture and storage, distributed energy, and back-up generators. Consider the ability to reduce utility costs and carbon emissions in the assessment.

S.2.H Consider creating neighborhood level plans to improve initial emergency response, subsequent recovery, and ongoing self-sufficiency within the city.

Additionally, the 2021 Circulation Element identifies roadway improvements that would increase traffic capacity, and thereby ensure that the roadway network would be capable of accommodating traffic flows during emergency response and emergency evacuation. Therefore, adherence to applicable LHMP standards and 2021 GPU Safety Element policies, as well as increased traffic capacity in the proposed roadway network, would ensure that the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

### **4.9.5.7 Topic 7: Wildland Fires**

*Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

Threats associated with wildland fires are also addressed in Section 4.18 of this EIR. The potential for wildland fires represents a hazard, particularly within areas adjacent to open space or within close proximity to wildland fuels. As shown in Figures 4.18-1 and 4.18-2 presented in Section 4.18 of this EIR, the proposed Concept Areas have largely avoided areas



identified as having High, Very High, or Extreme CAL FIRE threat designations. The proposed land use changes located near these CAL FIRE threat designations are limited to the Residential Density Change Concept Area located immediately east of Moreno Beach Drive designated with a Very High CALFIRE Fire Hazard Severity Zone (FHSV) (see Figure 4.18-1) and designated as a mix of Extreme, Very High, and High CAL FIRE Threat Areas (see Figure 4.18-2) Additionally, the Residential Density Change Concept Area north of SR-60 is located adjacent to an area designated with a Very High CAL FIRE FHSV, and the Highway Office/Commercial Concept Area is located adjacent to an area designated with a Moderate CAL FIRE FHSV (see Figure 4.18-1). Furthermore, future development and redevelopment outside of the proposed Concept Areas consistent with the existing 2006 General Plan land use designations may also be located within, or adjacent to land identified as having High, Very High, or Extreme CAL FIRE threat designations. For instance, areas along the entire northern perimeter of the Planning Area and areas adjacent to the Bernasconi Hills in the southeastern part of the city are designated Very High FHSZs, as are areas along the eastern perimeter of the Planning Area. There is existing low density single-family residential development in and adjacent to these Very High FHSZs, notably in the vicinity of Petit Hill north of Ironwood and south of Iris and John F. Kennedy, where residential neighborhoods abut the Bernasconi Hills. Prolonged droughts coupled with high winds and dry vegetation create the highest fire risk in these areas, particularly in autumn and winter, when the Santa Ana winds typically blow and wildfire risk increases significantly. In addition to the direct physical threat to life and property, smoke released during an event can have a detrimental effect on air quality and lead to health risks from smoke inhalation. To address this risk, the City cooperates with CAL FIRE and the Riverside County Fire Department through cooperative fire protection agreements. Portions of the planning area within the SOI are designated State Responsibility Areas (SRA), where the state of California is financially responsible for the prevention and suppression of wildfires, while the MVFD has primary responsibility for Local Responsibility Areas (LRA) within the city limit.

Wildland urban interface areas exist on the north, east, and south edges of the planning area, including Box Springs Mountain and San Timoteo Canyon to the north, the “Badlands” to the east, and Lake Perris State Park to the south. Portions of these areas within the city limit are partially developed with low density single-family housing, while portions in the SOI are largely undeveloped. Within the city limit, large tracts of land in wildland urban interface areas are designated Parks/Open Space on the 2021 GPU proposed land use map, which does not permit residential development, and existing development is limited to low density single-family homes. Undeveloped lands in wildland urban interface areas within the city limit are designated Hillside Residential or Rural Residential, which permit only very low density residential development. The City has adopted specific requirements for development in these areas. All new construction in these areas is required to prepare a fuel modification plan before approval of tentative maps and grading permits. The City has also established a weed hazard abatement program, which is overseen by MVFD. This program is designed to create defensible space, or a buffer between a building and the flammable vegetation that surrounds it, in order to stop or slow the spread of wildfire and protect property.

The 2021 GPU would also require preparation of a fire protection plan (FPP) approved by the City prior to approving new development in Very High FHSZs. FPPs must include mitigation measures designed to address the unique problems resulting from the location, topography, geology, flammable vegetation, and climate of the proposed site. They must also consider water supply, access, building ignition and fire resistance, fire protection systems and equipment, defensible space, and vegetation management, and must be consistent with the requirements of California Building Code Chapter 7A, the International Wildland-Urban Interface Code, and the Moreno Valley Municipal Code. Additionally, the 2021 GPU includes policies to provide fire prevention and emergency response services that minimize fire risks and protect life and property, and monitor the pace and location of development within the Planning Area and coordinate the timing of fire station construction or expansion to the rise of service demand in surrounding areas to ensure fire safety. Therefore, compliance with MVFD regulations and 2021 GPU policies would ensure that project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, and impacts would be less than significant.

### **4.9.6 Cumulative Analysis**

Future development could result in increased commercial and industrial uses which require the transport, use, and disposal of hazardous materials. New commercial and industrial could also result in an increase in the amount of truck traffic in the area, as well as the number of trucks potentially transporting hazardous materials. Therefore, the project could contribute to a cumulatively significant impact associated with hazardous materials. However, future development and redevelopment would be required to adhere to all relevant federal, state, regional, and local plans, Municipal Code regulations, and proposed 2021 GPU policies related to hazardous materials. Specifically, future projects would be required to submit RMPs under the CalARP Program and BEPs, if applicable, to provide all required information necessary to ensure that the proposed business is minimizing the potential for accidental release of hazardous materials. Similarly, future development and redevelopment would be required to adhere to applicable regulations relating to clean-up and/or remediation of hazardous materials, emergency access, and airport hazards. Furthermore, future development and redevelopment would be required to adhere to MVFD regulations related to wildfire, and 2021 GPU policies includes policies to provide fire prevention and emergency response services that minimize fire risks and protect life and property, and monitor the pace and location of development within the Planning Area and coordinate the timing of fire station construction or expansion to the rise of service demand in surrounding areas to ensure fire safety. Therefore, the project would not contribute to a cumulative impact related to hazards and hazardous materials.

### **4.9.7 Significance of Impacts before Mitigation**

Impacts would be less than significant. No mitigation is required.

### **4.9.8 Mitigation**

Impacts would be less than significant. No mitigation is required.

### **4.9.9 Significance of Impacts after Mitigation**

Impacts would be less than significant. No mitigation is required.

## 4.10 Hydrology/Water Quality

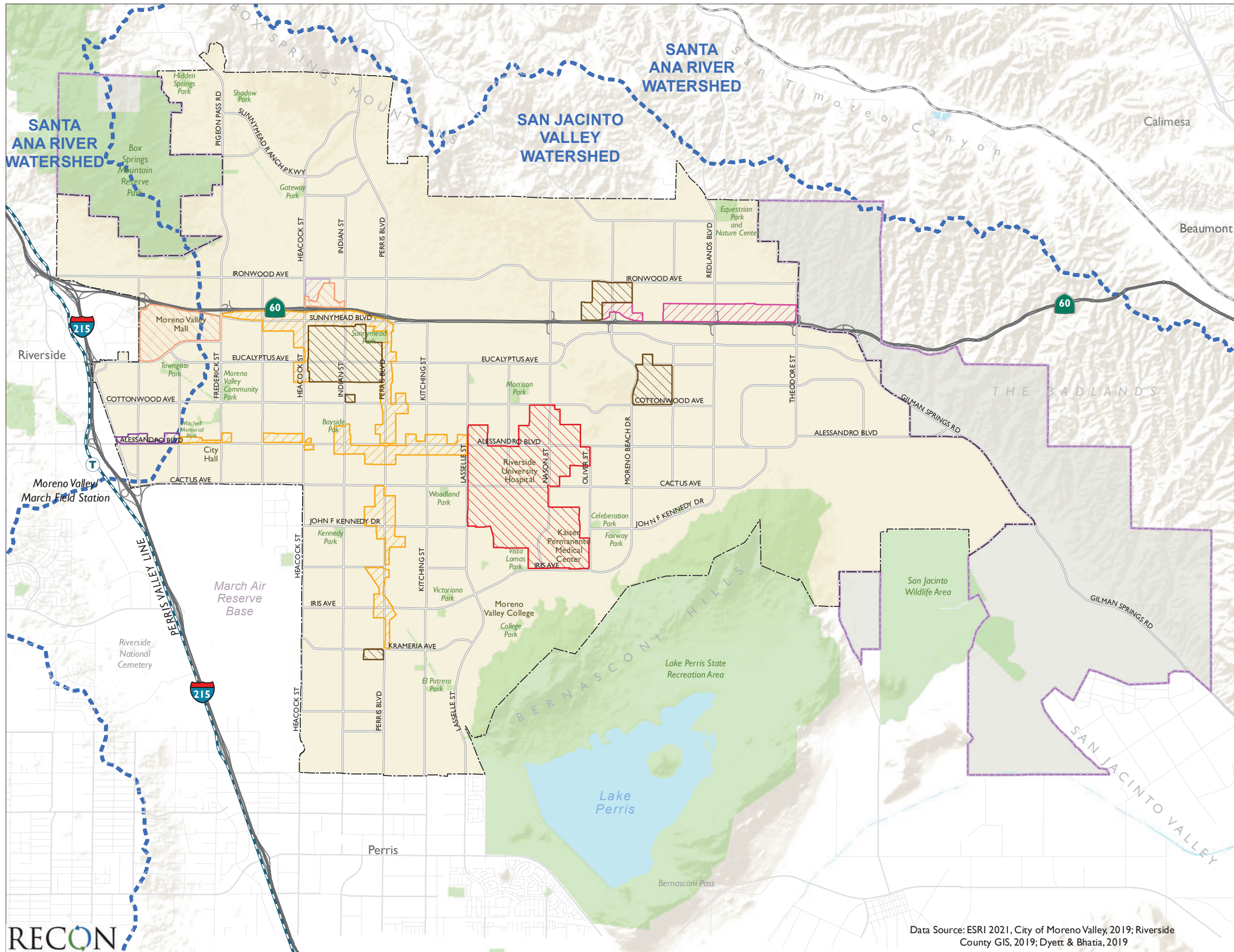
This section analyzes potentially significant impacts related to hydrology and water quality that could result from implementation of the project, which consists of the General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the entire city of Moreno Valley (city) and sphere of influence (SOI), which are collectively referred to as the Planning Area. This analysis relies on secondary source information including, but not limited to, watershed, flooding, and hydrological conditions from geographic information systems (GIS) databases. The analysis also considered City programs and plans, and data available from the California Regional Water Quality Control Board (RWQCB) - Santa Ana Region (SAR).

### 4.10.1 Existing Conditions

#### 4.10.1.1 Watersheds/Water Quality

Surface water quality in the Planning Area is regulated by RWQCB-SAR 8. The RWQCB-SAR Basin Plan (Basin Plan) establishes water quality standards for all the ground and surface waters of the region. As shown in Figure 4.10-1, the SAR includes the upper and lower Santa Ana River watersheds and the San Jacinto River watershed, with several other small drainage areas. Primary waterways within the Planning Area include Santa Ana River, San Jacinto River, Perris Lake, Railroad Canyon Reservoir (Canyon Lake), and Lake Elsinore. Section 303(d) of the federal Clean Water Act (CWA) defines water quality standards as consisting of both the uses of surface waters (beneficial uses) and the water quality criteria applied to protect those uses (water quality objectives). Beneficial uses for these waters, which have been assigned in the Basin Plan, include municipal and domestic supply, agricultural supply, groundwater recharge, industrial service supply, industrial process supply, contact water recreation, non-contact water recreation, warm freshwater habitat, cold freshwater habitat, and rare, threatened, or endangered habitat.

Most of the Planning Area drains into the San Jacinto River. The river exits the San Bernardino Mountains and continues westward to the Prado Dam, through the Santa Ana River Canyon, and then flows to the Pacific Ocean. In addition to being a major flood control facility, the river also serves as a means by which groundwater basins are recharged and is an important wildlife habitat.



- City of Moreno Valley
- Sphere of Influence
- Watershed Boundaries
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes



**FIGURE 4.10-1**  
Watersheds

Data Source: ESRI 2021, City of Moreno Valley, 2019; Riverside County GIS, 2019; Dyett & Bhatia, 2019



A minor topographic divide extending southward from the Box Springs Mountains across the western portion of the Planning Area acts as a drainage divide between the watersheds of the San Jacinto and Santa Ana rivers. All storm water runoff east of the topographic divide generally flows in a southerly direction to the San Jacinto River. Storm water west of the divide flows in a westerly direction to the Santa Ana River. The San Jacinto River drains approximately 540 square miles to the Railroad Canyon Reservoir (Canyon Lake) and the Railroad Canyon Reservoir occasionally discharges into Lake Elsinore. The Santa Ana RWQCB does not identify any water bodies within the Planning Area, or within the area which the Planning Area drains into, as currently listed on the federal CWA 303(d) list.

### 4.10.1.2 Storm Water Drainage Systems

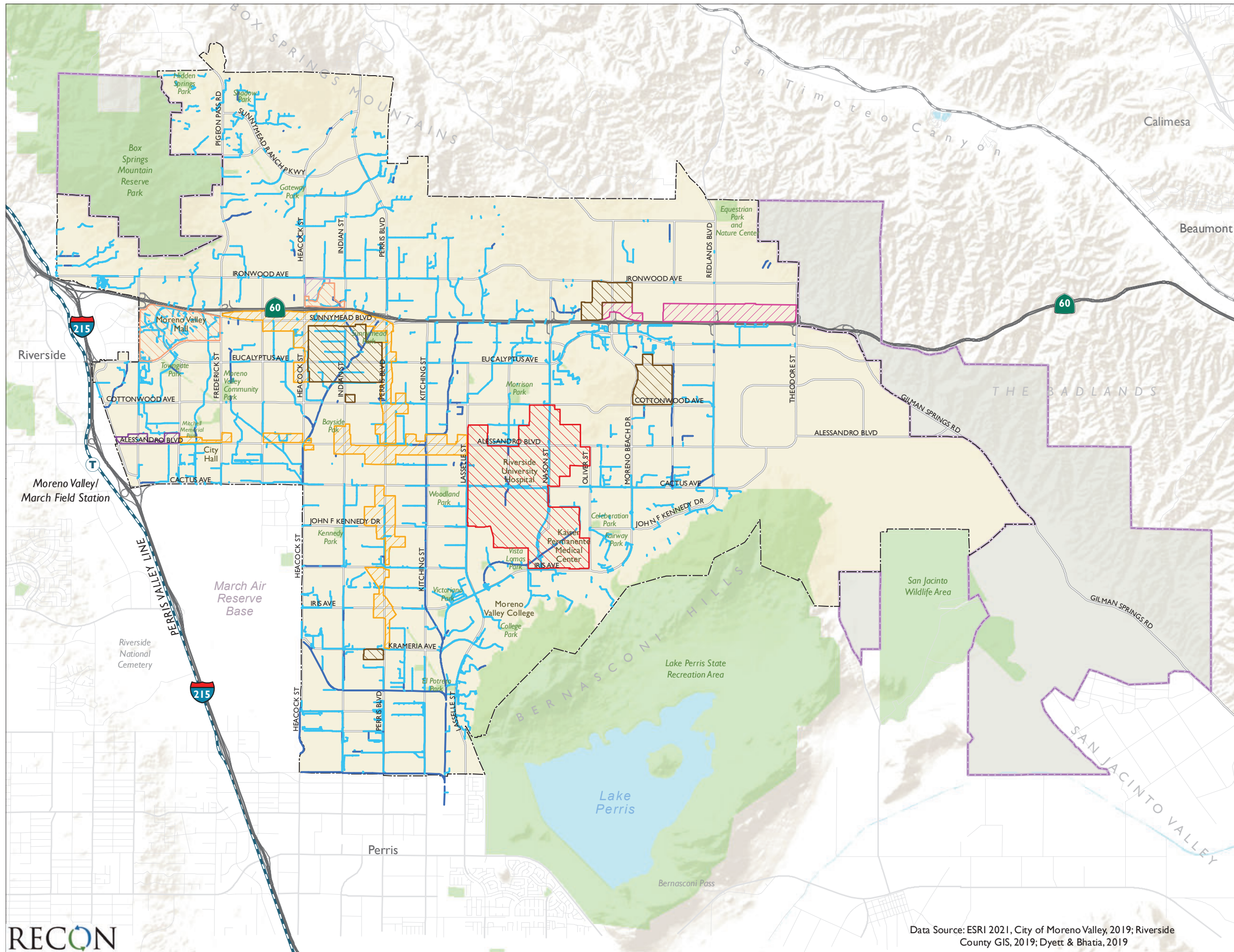
The local storm water conveyance system is designed to prevent flooding by transporting water away from developed areas. Unfiltered and untreated storm water can contain a number of pollutants that may eventually flow to surface waters. The chief cause of urban storm water pollution is the discharge of inadequately treated waste or pollutants into the natural water system. The existing storm drains located throughout the Planning Area are shown in Figure 4-10.2. The Riverside County Flood Control and Water Conservation District (RCFCWCD) has prepared four master drainage plans (Sunnymead Area, West End, Perris Valley, and Moreno), which address the three main storm channels covering different portions of the city.

### 4.10.1.3 Flooding and Dam Inundation

There are four types of flooding conditions that exist within the Planning Area: flooding in defined watercourses; ponding; sheet flow; and dam inundation. Flooding within defined watercourses occurs within drainage channels and immediately adjacent floodplains. Ponding occurs when water flow is obstructed due to manmade obstacles such as the embankments of State Route 60 (SR-60) and other roadways. Sheet flow occurs when capacities of defined watercourses are exceeded and water flows over broad areas (Moreno Valley 2017).

Several portions of the Planning Area are subject to a 100-year flood, meaning a flood with a one percent chance of occurring in any given year. Based on Federal Emergency Management Agency (FEMA) mapping (Riverside County Geographic Information Systems [GIS] 2019), Figure 4.10-3 shows the FEMA floodplains/floodways throughout the Planning Area. Additionally, Table 4-10-1 accounts for the acreage within the Planning Area within each FEMA flood designation.

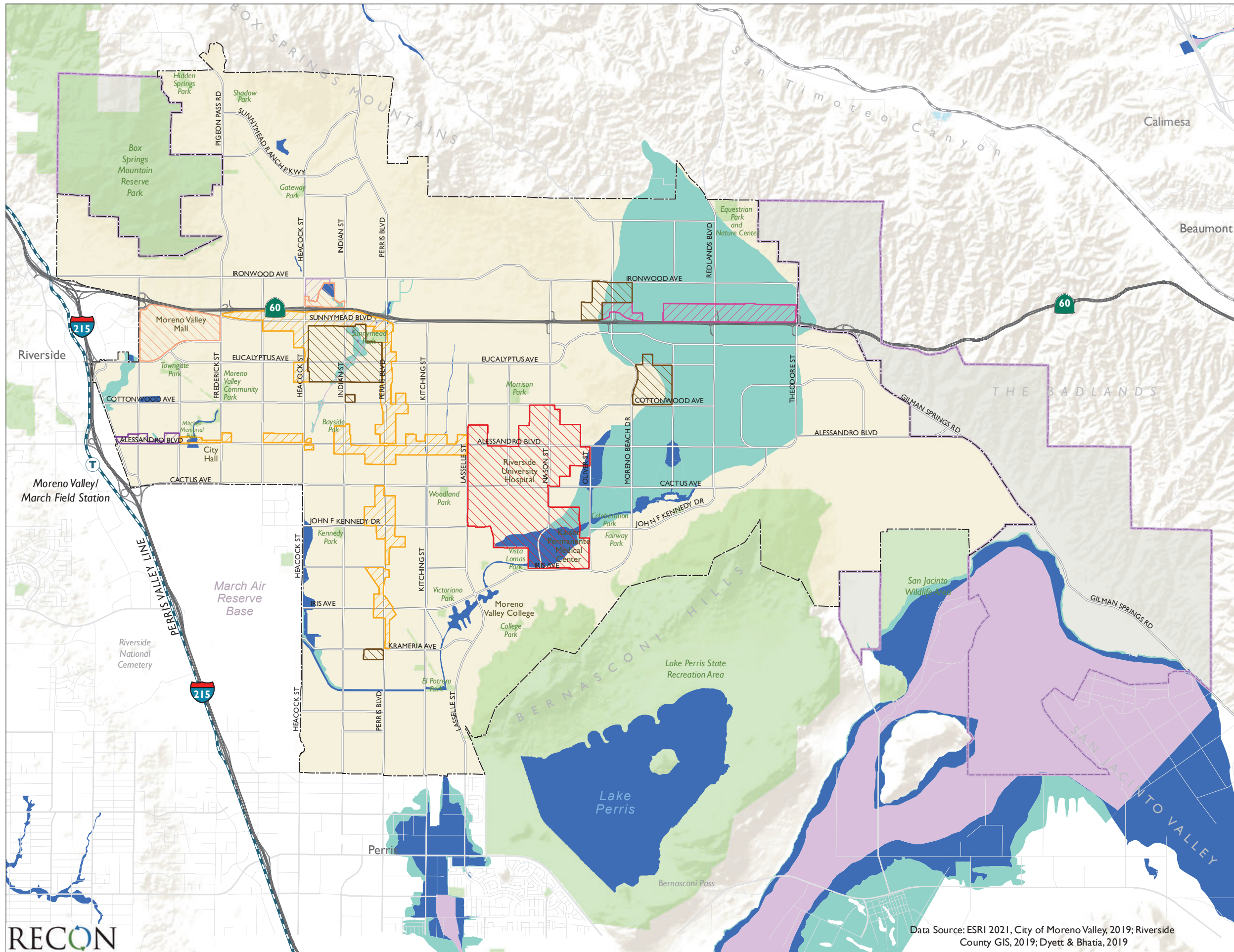
Floodplain/Floodway	Acres
500-year Floodplain	4,804.94
100-year Floodplain	873.93
Floodway	2,124.92
<b>TOTAL</b>	<b>7,803.79</b>
SOURCE: Riverside County GIS 2019.	



- City of Moreno Valley
- Sphere of Influence
- Storm Water Main
- Open Channel
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes



**FIGURE 4.10-2**  
Existing Storm Water Facilities



- City of Moreno Valley
- Sphere of Influence
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes
- FEMA Floodplains and Floodways**
- 500-year Floodplain
- 100-year Floodplain
- Floodway



**FIGURE 4.10-3**  
**FEMA Floodplains and Floodway**

Data Source: ESRI 2021, City of Moreno Valley, 2019; Riverside County GIS, 2019; Dyett & Bhatia, 2019



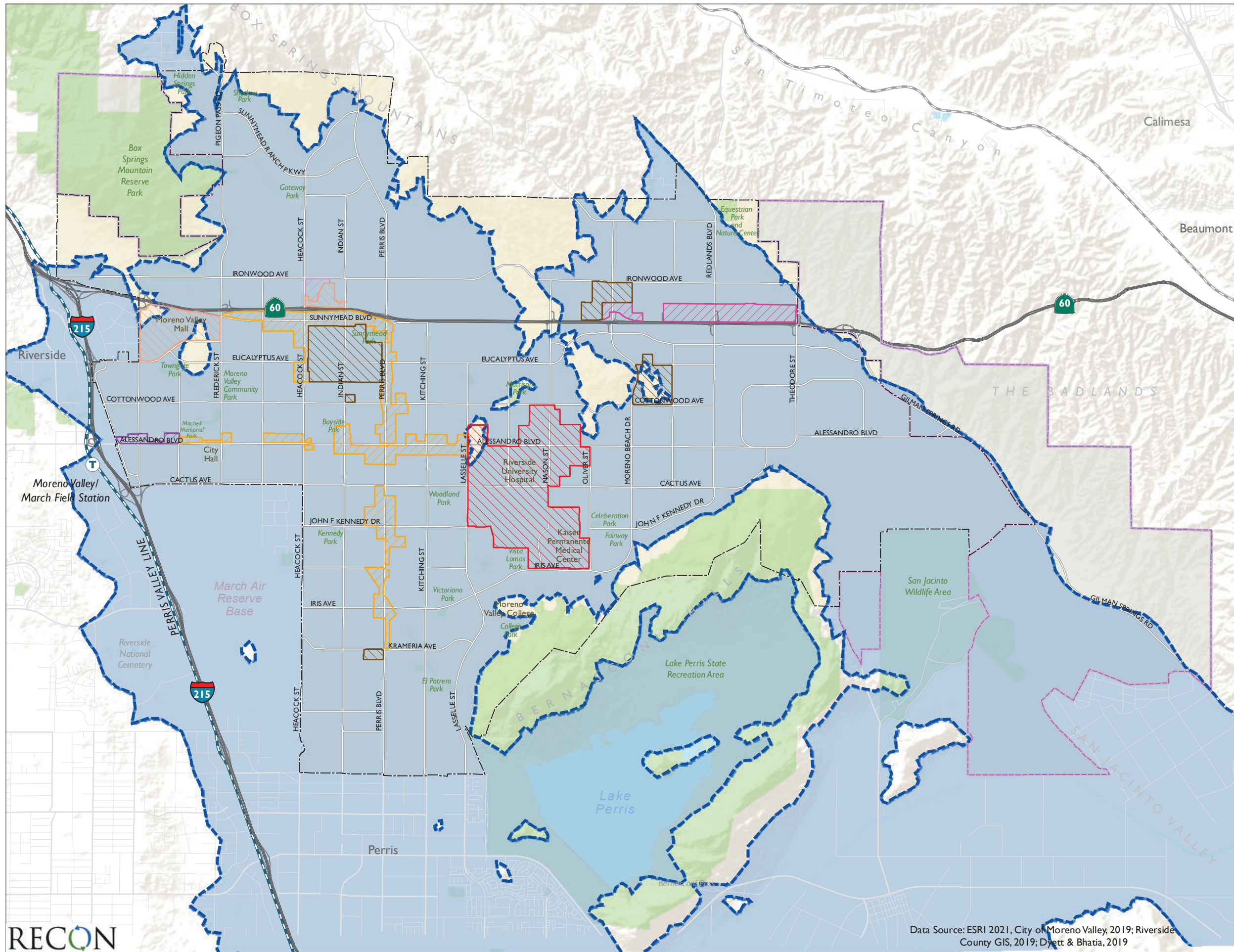


The Planning Area has been susceptible to flooding in the past. Flooding could occur from severe rainfall or from dam failure, seiches, or tsunamis. Dam inundation is flooding caused by the release of impounded water from structural failure or overtopping of a dam. Seiches or tsunamis can result from abrupt movements of large volumes of water due to earthquakes, landslides, volcanic eruptions, meteoric impacts, or onshore slope failure. Portions of the Planning Area are subject to dam inundation from two dams: Pigeon Pass Dam (Poorman's Reservoir) and Perris Dam. Specifically, failure of the Pigeon Pass Dam could result in extensive flooding along the downstream watercourse. The risk of flooding due to dam failure is limited to the period during and immediately after major storms. The reservoir does not retain water throughout the year. Failure of the Perris Dam would only affect a very small area south of Nandina Avenue along the Perris Valley storm drain and the Mystic Lake area in the southeast corner of Moreno Valley (Moreno Valley 2017). Dam remediation has been ongoing to protect against failure during a seismic event (Moreno Valley 2017).

#### **4.10.1.4 Groundwater**

According to the California Natural Resources Agency, the Planning Area lies within the San Jacinto groundwater basin. Figure 4.10-4 depicts the location of the San Jacinto groundwater basin in relation to the Planning Area. The California State Department of Water Resources (DWR) has estimated the groundwater basins in the vicinity of the planning area to have capacity for approximately one million acre-feet of water. It is estimated that the basins store approximately 620,000 acre-feet of water.

Water resources in the Planning Area are supported by potable groundwater wells, treated water from two desalination plants, imported water from Municipal Water District of Southern California (MWD) and water imported from other agencies. While potable ground water well account for similar acre-feet per of gross water use, this amount has reduced as a percentage of gross water use as use has increased and other available water supplies have been available including desalters and water filtration plants, and reliance on imported water from MWD and other agencies (Eastern Municipal Water District [EMWD] 2016)



- City of Moreno Valley
- Sphere of Influence
- San Jacinto Groundwater Basin
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes



**FIGURE 4.10-4**  
Groundwater

## 4.10.2 Applicable Regulatory Requirements

### 4.10.2.1 Federal Regulations

#### a. Federal Water Pollution Control Act (also known as Clean Water Act)

The CWA, enacted in 1972, is intended to restore and maintain the integrity of the nation's water through a system of water quality standards, discharge limitations, and permits. The fundamental purpose of the CWA is the protection of designated beneficial uses of water resources. Section 303(d) of the CWA defines water quality standards as consisting of both the uses of surface waters (beneficial uses) and the water quality criteria applied to protect those uses (water quality objectives). State and regional water quality control boards have been charged with ensuring that beneficial uses and water quality objectives are established for all waters of the state. Development in the Planning Area would be subject to the National Pollutant Discharge Elimination System (NPDES) to protect water resources and control pollutants in runoff. The program requires communities of a certain size to obtain permits from the RWQCB-SAR. Moreno Valley, Riverside County and 23 other cities and agencies obtained a joint NPDES permit from the RWQCB-SAR. As a co-permittee, the City has a number of obligations and responsibilities including maintaining storm drain systems, pursue enforcement for failure to comply with the permit, and respond to emergency situations related to pollution discharge.

The NPDES program also requires operators of construction sites one acre or larger to prepare a Storm Water Pollution Prevention Plan (SWPPP) for construction activities and obtain authorization to discharge storm water under an NPDES construction storm water permit (Moreno Valley 2019). The NPDES program also requires certain land uses (e.g., industrial uses) to prepare a SWPPP for operational activities and to implement a long-term water quality sampling and monitoring program, unless an exemption has been granted.

#### b. Federal Emergency Management Agency

FEMA is the primary agency in charge of administering programs and coordinating with communities to establish effective floodplain management standards. FEMA is responsible for delineating areas of flood hazards. It is then the responsibility of state and local agencies to implement the means of carrying out FEMA requirements. As discussed above, portions of the Planning Area are located within a mapped flood hazard area (see Figure 4.10-3).

### 4.10.2.2 State Regulations

#### a. Porter-Cologne Water Quality Control Act

This act, which is a portion of the State Water Code, establishes responsibilities and authorities of the state's RWQCB. Each RWQCB is directed to adopt water quality control plans for the waters of an area to include identification of beneficial uses, objectives to protect

those uses, and an implementation plan to accomplish the objectives. The Planning Area is under the jurisdiction of the RWQCB-SAR.

## **b. Sustainable Groundwater Management Act**

In 2014, California lawmakers passed the Sustainable Groundwater Management Act (SGMA), which mandates that all groundwater basins within the state be managed to ensure long-term water supply reliability. Under SGMA, each high and medium priority basin, as identified by the California DWR, must have a groundwater sustainability agency that will be responsible for groundwater monitoring and the development of a groundwater sustainability plan to ensure long-term groundwater sustainability and prevent overdraft.

### **4.10.2.3 Regional Regulations**

#### **a. West San Jacinto Groundwater Sustainability Agency**

Under SGMA, each high and medium priority basin, as identified by the California DWR, is required to have a groundwater sustainability agency that will be responsible for groundwater management and development of a groundwater sustainability plan. The EMWD Board of Directors is the groundwater sustainability agency for the West San Jacinto Groundwater Basin and is responsible for development and implementation of a groundwater sustainability plan (EMWD 2020).

#### **b. Regional Water Quality Control Board Requirements for Septic Systems**

All proposed septic systems (subsurface sewage disposal systems) must comply with RWQCB regulations designed to prevent groundwater contamination from septic system effluent.

#### **c. Municipal Storm Water Permit**

The current Municipal Separate Storm Sewer System (MS4) Permit (MS4 Permit) (R8-2010-0033) became effective for listed co-permittees, including the County, on June 27, 2013. The MS4 Permit implements a regional strategy for water quality and related concerns, and mandates a watershed-based approach that often encompasses multiple jurisdictions. MS4 co-permittees; and (2) allowing the co-permittees to focus their efforts and resources on achieving identified goals and improving water quality, rather than just completing individual actions (which may not adequately reflect identified goals). Under this approach, the co-permittees are tasked with prioritizing their individual water quality concerns, as well as providing implementation strategies and schedules to address those priorities.

#### **d. Santa Ana Region of Riverside County Water Quality Management Plan**

The RWQCB-SAR WQMP is a guidance document that helps to design projects in compliance with water quality mitigation requirements for priority development projects. These

requirements are specified in the MS4 Permit issued to the RCFCWCD, County of Riverside, and other cities within the Santa Ana River watershed. The WQMP outlines those categories of projects, called priority development permits, that require project level WQMPs. Examples of projects that require a WQMP include:

- New development that creates 10,000 square feet or more of impervious surface (collectively over the entire project site), including commercial and industrial projects and residential housing subdivisions requiring a Final Map (i.e., detached single-family home subdivisions, multi-family attached subdivisions, condominiums, apartments, etc.); mixed use and public projects (excluding road projects).
- Hillside developments disturbing 5,000 square feet or more which are located on areas with known erosive soil conditions or where the natural slope is 25 percent or more.
- Developments of 2,500 square feet of impervious surface or more adjacent to (within 200 feet) or discharging directly into environmentally sensitive areas.
- The addition or replacement of 5,000 square feet of impervious surface on an already developed site.

Project-specific WQMPs are required to include storm water best management practices (BMPs) addressing post-construction activities. WQMPs could include the requirement for low impact development (LID) BMPs and hydromodification BMPs, as necessary, to address water quality concerns. LID comprises a set of technologically feasible and cost-effective approaches to stormwater management and land development that combine a hydrologically functional site design with pollution prevention measures to compensate for land development impacts on hydrology and water quality. LID techniques mimic the site's predevelopment hydrology by using site design techniques that store, infiltrate, evapotranspire, bio-treat, bio-filter, bio-retain, or detain runoff close to its source.

#### **e. Santa Ana River Basin Water Quality Control Plan**

As mentioned above, the State Water Resources Control Board adopts statewide water quality control plans and its nine RWQCBs are required to develop and adopt regional water quality control plans that conform to state water quality policy. The city is subject to the RWQCB-SAR's Santa Ana River Basin Water Quality Control Plan, which designates beneficial uses of water bodies to be protected and establishes water quality objectives.

#### **f. Riverside County Flood Control and Water Conservation District**

The RCFCWCD is the regional flood management authority for the western part of Riverside County, including the city. The purpose of the RCFCWCD is to identify flood hazards and problems, regulate floodplains and development, regulate drainage and development, construct and maintain flood control structures and facilities, and complete County watercourse and drainage planning. The RCFCWCD is funded through a share of property taxes in addition to other funding sources. As a special district, the RCFCWCD's jurisdiction extends over the western 40 percent of Riverside County.

## **g. Eastern Municipal Water District 2015 Urban Water Management Plan**

The EMWD 2015 Urban Water Management Plan (UWMP) provides an overview of the EMWD's long-term water supplies and demands and reports on the District's progress towards meeting the water use efficiency targets. The plan includes demand management measures that the EMWD has agreed to implement to achieve water supply savings.

### **4.10.2.4 Local Regulations**

#### **a. Master Drainage Plans**

Master Drainage Plans (MDPs), as administered by the RCFCWCD, identifies a conceptual network of drainage facilities needed to properly convey water at a regional level throughout portions of the city. There are four MDPs, managed by the RCFCWCD, that cover the majority of the Planning Area, namely they are the Moreno MDP, the West End MDP, the Sunnymead MDP, and the Perris Valley MDP. The MDPs address regional level facilities in Moreno Valley and provide a network of drainage facilities which, when implemented, will provide proper water conveyance to the community as development continues. The fully implemented MDPs should, in conjunction with ultimate street improvements for the area within the plan boundaries, contain the 100-year frequency flows. The MDPs identify preferred facility alignments, sizing, and right-of-way required for the future construction of MDP facilities to protect existing and future development. The MDPs are intended to be used as a guide for future developments and that such developments be required to conform to the MDPs.

#### **b. Local Hazard Mitigation Plan**

The Local Hazard Mitigation Plan (LHMP) is designed to identify the city's hazards, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term natural or made-made hazard risks to life and property. The LHMP identifies specific hazards related to flooding and erosion that could result in damage to life and/or property. The LHMP also establishes hazard priority and identifies mitigation strategies for reducing losses associated with these hazards.

#### **c. City of Moreno Valley Municipal Code**

Title 8 of the City of Moreno Valley Municipal Code (Municipal Code) contains a number of regulations that address hydrology and water quality.

Chapter 8.10 Stormwater/Urban Runoff Management and Discharge Controls contains requirements that address reducing pollutants in storm water discharges to protect and enhance the water quality of local watercourses. In addition to requiring a NPDES permit, Municipal Code Section 8.10.050 specifies that new development and significant redevelopment control stormwater runoff so as to prevent any deterioration of water quality

through the identification of BMPs. The BMPs may include, but are not limited to, the following:

1. Increase permeable areas by leaving highly porous soil and low-lying areas undisturbed; by incorporating landscaping, green roofs and open space into the project design; by using porous materials for or near driveways, drive aisles, parking stalls and low volume roads and walkways; and by incorporating detention ponds and infiltration pits into the project design.
2. Direct runoff to permeable areas by orienting it away from impermeable areas to swales, berms, green strip filters, gravel beds, rain gardens, pervious pavement or other approved green infrastructure and French drains; by installing rain gutters oriented towards permeable areas; by modifying the grade of the property to divert flow to permeable areas and minimize the amount of stormwater runoff leaving the property; and by designing curbs, berms or other structures such that they do not isolate permeable or landscaped areas.
3. Maximize stormwater storage for reuse by using retention structures, subsurface areas, cisterns, or other structures to store stormwater runoff for reuse or slow release.
4. Rain gardens may be proposed in-lieu of a water quality basin when applicable and approved by the city engineer.

Chapter 8.12 Floodplain Ordinance provides regulations to minimize public and private losses due to flood conditions. Projects located within special flood hazard areas as identified by FEMA are required to obtain development permits. Construction within the special flood hazards areas is required to use standards of constructions set forth in Municipal Code Section 8.12.170, including:

1. Anchoring measures.
2. Flood resistant construction materials.
3. Adequate elevation and flood proofing.

Chapter 8.21 Grading Regulations includes the requirement for all project's that require a grading plan to also submit an erosion control plan. Pursuant to Municipal Code Section 8.21.160(B) erosion control plans are required to include details of protective measures, including desiltation basins or other temporary drainage or control measures or both, as may be necessary to protect adjoining public or private property from damage by erosion, flooding, or mud and/or debris deposits which may originate from the site or result from the grading operations. Additionally, Municipal Code Section 8.21.160(E) requires the containment of all sediment stating that runoff from disturbed areas is required to be detained or filtered by berms, swales, ditches, filter strips or other means as necessary to prevent the escape of sediment from the site.

## **d. Moreno Valley Capital Improvement Plan**

The City's Capital Improvement Plan (CIP) (2020c) is an important planning and managing tool for the city's growth and development as well as a strategy for the maintenance of existing infrastructure. The CIP identifies projects required through the ultimate General Plan build-out of the city, which includes approximately \$1.53 billion for 317 projects to improve and maintain the city's infrastructure.

### **4.10.3 Methodologies for Determining Impacts**

The potential for significant impacts associated with the project has been determined based upon review of existing secondary source information and data relative to the hydrology and water quality resources available for the Planning Area.

### **4.10.4 Basis for Determining Significance**

Thresholds used to evaluate impacts to hydrology and water quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact would occur if the project would:

- 1) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;
- 2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
- 3) 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 a substantial erosion or siltation on- or off-site;
  - ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
  - 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; or
  - iv) impede or redirect flood flows;
- 4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or



- 5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

## 4.10.5 Impact Analysis

### 4.10.5.1 Topic 1: Violate Water Quality Standards/Degrade Water Quality

*Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The project would result in development of new uses throughout the Planning Area, as shown in Figure 3-1. Additionally, currently developed but under-developed parcels could also be redeveloped with more intensive uses, especially to meet the City's Housing Element Regional Housing Needs Assessment, and land uses outside the proposed Concept Areas would be developed consistent with the existing 2006 General Plan. Both construction and operational activities associated with new development (and redevelopment) could contribute to a degradation of water quality.

#### a. Construction-Related Water Quality Impacts

Future construction would involve grading, paving, utility installation, building construction, and landscaping installation, which could result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other pollutants with the potential to affect water quality.

Pursuant to the requirements of the RWQCB-SAR and Municipal Code Chapter 8.10, future development would be required to obtain a Construction General Permit (CGP) Permit for construction activities. The CGP permit is required for all projects that include construction activities, such as clearing, soil stockpiling, grading, and/or excavation that disturb at least one acre of total land area. Additionally, all future development would be required to comply with the SAR Basin Water Quality Control Program. Compliance with the CGP Permit and the SAR Basin Water Quality Control Plan requires completion and submittal of a SWPPP for construction-related activities. The SWPPP would identify potential runoff that could result from the proposed construction and specify the BMPs that would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged. Therefore, adherence to relevant plans and programs, as well as Municipal Code requirements would ensure that future development would not violate any water quality standards or degrade surface or ground water quality, and construction-related impacts would be less than significant.

#### b. Post-Development Water Quality Impacts

Storm water pollutants commonly associated with the land uses proposed by the project include bacterial indicators, metals, nutrients, pesticides, toxic organic compounds,

sediments, trash and debris, and oil and grease. Pursuant to the Municipal Code Chapter 8.10, future development would be required to implement a WQMP to demonstrate compliance with the City's MS4 Permit and to minimize the release of potential waterborne pollutants. Each site-specific WQMP would include post-construction BMPs that would be permanent design features to address the reduction of storm water runoff. In addition to the WQMP, future industrial development would be governed by the Industrial General Permit (IGP), which requires the preparation of a SWPPP for operational activities. Moreover, future development would be required to adhere to the GPU Open Space and Resource Conservation (OSRC) Element, which includes the goal to minimize water pollution, and policies that require storm water pollution prevention. Therefore, adherence to relevant plans and programs, including the IGP, as well as Municipal Code requirements for preparation of a WQMP and applicable GPU policies, would ensure that future development would not violate any water quality standards or degrade surface or ground water quality, and long-term operational impacts would be less than significant.

#### **4.10.5.2 Topic 2: Deplete Groundwater Supplies**

*Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Future development would increase in the amount of impervious surfaces within the Planning Area, which would reduce the amount of rainwater that would infiltrate the soil and incrementally reduce groundwater recharge rates over time. However, as described in Section 4.10.1.4 above, domestic water supplies throughout the Planning Area are not primarily reliant on groundwater. Additionally, the framework of the SGMA requires that groundwater basins within the state are managed to ensure long-term water supply reliability. Furthermore, the project has been designed to minimize the increase in impervious surfaces by primarily focusing on future development and redevelopment within the proposed Concept Areas that consist of clusters of vacant and underutilized land within the city limit that would allow for continued groundwater recharge in substantial portions of the Planning Area. Additionally, the OSRC Element includes goals to preserve and protect natural resources, and identifies policies to ensure groundwater protection and improve groundwater infiltration measures. Therefore, adherence to applicable GPU policies would ensure that future development would neither substantially deplete groundwater supplies nor interfere substantially with groundwater recharge, and impacts would be less than significant.

#### **4.10.5.3 Topic 3: Drainage Patterns**

*Would the project 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 a substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (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; or iv) impede or redirect flood flows?*

### **a. Erosion or Siltation**

Future development and redevelopment could alter drainage patterns by increasing the amount of impervious surfaces (e.g., streets, sidewalks and parking lots), which have a lower absorption rate for rainfall than that of vacant natural lands. However, future development would be required to construct storm drain infrastructure as necessitated in the City's MDPs, and on-site drainage facilities to ensure adequate water quality/detention basins to capture and convey storm water run-off consistent with or less than existing patterns. Individual WQMPs would include project-specific BMPs aimed at minimizing erosion and removing sedimentation from surface runoff. Future development would adhere to Municipal Code Chapters 9.17.110 and 8.10.050 requiring erosion control landscape plans, and erosion and sediment control in construction activity, respectively. Specifically, erosion control measures would ensure that surface water runoff flows leaving future development sites would not carry substantial amounts of sediment. Moreover, the GPU includes goals and policies intended to minimize water pollution through storm water pollution protection. Therefore, adherence to Municipal Code requirements and applicable GPU goals and policies would ensure that future development would not result in a substantial erosion or siltation on- or off-site, and impacts would be less than significant.

### **b. Increase Surface Runoff**

The construction of new development and redevelopment throughout the Planning Area could result in a change of drainage patterns or increase velocity of run-off which could lead of off-site flooding. Pursuant to the SAR WQMP, some future development may be required to include BMPs to reduce flow velocity of storm water runoff. Such BMPs could include on-site drainage swales, bioretention features, use of permeable pavers in parking areas and streets, or infiltration basins which also serve as a means for pollutant removal. Additionally, applicable Priority Development Projects would be required to include LID BMPS to treat potentially polluted runoff prior to entering the public storm drain system. Project-specific studies would be required to ensure that volume-based treatment LID BMPs are properly sized to infiltrate, filter, or treat the remaining portion of the runoff volume that was not retained or treated by other BMPs. Future development would also be required to adhere to Municipal Code Chapter 9.14.110, which requires flood control measures to be included in development plans. Therefore, adherence to Municipal Code requirements and applicable GPU goals and policies would ensure that future development would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, and impacts would be less than significant.

### **c. Exceed Capacity of Stormwater System**

Future development could result in increased volumes of storm water runoff affecting the existing storm water drainage system. As discussed above, future development would be required to ensure surface water runoff rates and volumes closely resemble those that occur

under existing conditions. Additionally, the City's MDPs identifies facility upgrades that could apply future development. While some infrastructure improvements are included in the City's CIP, some could be carried by developers to ensure that new runoff volumes, added to existing conditions, would not exceed the capacity of the City's system. As described in Section 4.10.5.1 above, future development would be required to comply with future SWPPPs and the project-specific WQMP, which would identify BMPs to be incorporated into development plans to ensure that near-term construction activities and long-term post-development activities would not result in substantial amounts of polluted runoff. Therefore, adherence to regional and local plans and regulations would ensure that future development would not create or contribute substantial additional sources of polluted runoff that would exceed the capacity of existing or planned stormwater drainage systems, and impacts would be less than significant.

#### **d. Flood Flows**

Future development could increase volumes of stormwater runoff resulting in the impediment or redirection of flood flows. As described in Sections 4.10.5.1 and 5.10.5.3(a-c) above, future development would be required to adhere to regional and local plans, programs and regulations relating to storm water runoff and volume flow. All future development would include BMPs to manage polluted runoff and minimize flow volume and velocity. Therefore, adherence to Municipal Code requirements and applicable GPU goals and policies would ensure that future development would not substantially impede or redirect flood flows, and impacts would be less than significant.

#### **4.10.5.4 Topic 4: Flood hazard, Tsunami, or Seiche**

*In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

The Pacific Ocean is located more than 40 miles from the city. Therefore, there is no potential for tsunamis to impact the Planning Area. As shown in Figure 4-10.3, a portion of the Planning Area is located within a 500-year floodplain, and a small portion within a 100-year floodplain. Specifically, the Highway Office/Commercial Concept Area, both Residential Density Change Concept Areas along Moreno Beach Drive, and a small portion of the Downtown Center within areas designated as 500-year and 100-year floodplains. Future development within these areas, as well as the rest of the Planning Area would be required to comply with Municipal Code Chapter 8.12, Floodplain Ordinance, which requires flood safe measures be included in development plans. Specifically, future development may require elevated building pads, and/or other compliance measures as specified by FEMA. For example, future development within the 100-year floodplain would be required to secure a Conditional Letter of Map Revision and Permanent Letter of Map Revision from FEMA to demonstrate that proposed structures would be located outside of a 100-year flood hazard area. Moreover, future development would be required to adhere to the GPU Safety Element goal to protect life and property from natural and manmade hazards, as well as policies requiring flood protection. Therefore, adherence to FEMA processes and Municipal Code requirements for flood safe measures, and GPU policies would ensure that future

development would not result in risks associated with flooding and would be less than significant.

Portions of the Planning Area are subject to inundation from two dams: Pigeon Pass Dam (Poorman's Reservoir) and Perris Dam. As described in Section 4.10.1.3 above, risk associated with flooding due to dam failure at Pigeon Pass Dam (Poorman's Reservoir) is limited to the period during and immediately after major storms. The reservoir does not retain water throughout the year. As described above, future development surrounding Pigeon Pass Dam (Poorman's Reservoir) would be required to comply with Municipal Code Chapter 8.12, Floodplain Ordinance, which requires flood safe measures be included in development plans. Furthermore, future development would be required to adhere to the GPU Safety Element goal to protect life and property from natural and manmade hazards, as well as policies requiring flood protection. Perris Dam was identified as a high priority state-owned dam due to its proximity to nearby faults and large downstream communities. In 2018, a major retrofit to Perris Dam was completed as a statewide effort to reduce seismic risks to dams (DWR 2019). Upgrades to the dam include a reinforced foundation, construction on the Outlet Tower Bridge (planned to be complete in 2020), and improvements to the Emergency Release Facility that would direct the flow of water in an emergency requiring the dewatering of the reservoir (planned for completion 2023). Implementation of these remediation measures at Perris Dam would ensure that impacts related to flooding due to dam failure would be less than significant. Lake Perris, located approximately one mile south of the Planning Area, is the only large water body that could cause a seiche. The remediation measures for Perris Dam described above would also serve to protect against a seiche. Mystic Lake is a season water body that is dry for substantial periods of time located in the southeastern portion of the SOI. Land surrounding Mystic Lake is currently undeveloped and is designated as Floodplain in the 2021 GPU. Therefore, impacts associated with flooding due to dam failure and seiche would be less than significant.

#### **4.10.5.5 Topic 5: Water Quality Plans**

*Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

As described in Section 4.10.5.1 above, future development would be required to comply with the SAR Basin Water Quality Control Program, which includes the requirement to complete and submit of a SWPPP for construction-related activities. Future development would also be required to implement a WQMP to demonstrate compliance with the City's MS4 permit and to minimize the release of potential waterborne pollutants. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan, and impacts would be less than significant.

As described in Section 4.10.1.4 above, domestic water supplies throughout the Planning Area are not reliant on groundwater as a primary source. Additionally, the framework of the SGMA ensures that groundwater basins within the state are managed to ensure long-term water supply reliability. Furthermore, the OSRC Element includes the goals to preserve and protect natural resources, and policies are identified to ensure groundwater protection and

improve groundwater infiltration measures. Therefore, the project would not conflict with or obstruct implementation of a groundwater management plan, and impacts would be less than significant.

### **4.10.6 Cumulative Analysis**

Future development could increase the total amount of pollutants entering downstream rivers and water bodies, and could increase rates and volumes of storm water runoff due to new impermeable surfaces. However, future development would be required to adhere to all relevant regional and local plans, Municipal Code regulations, and proposed policies contained in the updated elements of the GPU. Specifically, future development would be required to submit WQMPs to identify BMPs directed at pollution reduction and the maintenance of on-site drainage patterns. Additionally, the project's incremental contribution to the drainage system and water quality impacts would not be cumulatively considerable due to compliance with the requirements of the joint NPDES permit from the RWQCB, which includes specific requirements to substantially reduce the potential for impacts. The project would achieve flood control and infrastructure maintenance needs through implementation of the City's MDPs and/or CIP. Moreover, the project would not result in flood hazards related to tsunami or seiche. Therefore, the project would not contribute to cumulative impact related to hydrology and water quality.

### **4.10.7 Significance of Impacts before Mitigation**

With respect to all issues discussed under Section 4.10.5, future development would be required to comply with GPU OSCR Element policies supporting the protection of water quality, thereby minimizing potential adverse impacts. Additionally, future development would also be required to comply with regional and local plans, the City's Municipal Code requiring project-specific BMPs to reduce polluted runoff, maintain drainage patterns, and minimize runoff flows and volumes. Consistent with General Plan OSCR Element policies, future development would submit a SWPPP, if necessary, and adhere to Municipal Code requirements for WQMPs. Therefore, impacts related to hydrology and water quality would be less than significant.

### **4.10.8 Mitigation**

Impacts associated with hydrology and water quality would be less than significant. No mitigation is required.

### **4.10.9 Significance of Impacts after Mitigation**

Impacts associated with hydrology and water quality would be less than significant. No mitigation is required.

## 4.11 Land Use/Planning

This section analyzes potentially significant impacts related to land use and planning that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the entire city of Moreno Valley (city) and the sphere of influence (SOI), which are collectively referred to as the Planning Area. Within the analysis, Concept Areas refer to those areas where the GPU proposes land use changes as shown on Figure 3-1.

### 4.11.1 Existing Conditions

#### 4.11.1.1 Existing Land Uses

The total area of land in the Planning Area is approximately 42,900 acres or 67 square miles, of which 33,000 acres are within the city limit. Land outside of the city limit but within the SOI is largely undeveloped natural open space or in use for agricultural purposes. A summary of existing land uses based on data from the city and Riverside County is provided in Chapter 2.0, Table 2-1. Existing land uses shown on Figure 4.11-1.

Residential land uses account for nearly 32 percent of land (10,479 acres) within the city limit, concentrated primarily in the western and central portions of the city where most development has historically occurred. Single-family housing accounts for the bulk of all residential uses within the city, while multi-family housing accounts for less than 3 percent of citywide land use. Established single-family neighborhoods include Hidden Springs, Sunnymead Ranch, and Moreno Valley Ranch. Single-family attached and multi-family housing is generally present in all residential neighborhoods, with the highest concentrations just south of the commercial stretch of Sunnymead Boulevard between Heacock Street and Perris Boulevard.

Commercial land uses, including retail, office, and lodging, account for 2.3 percent of the land within the Planning Area. Within the city limit, commercial land uses account for 3 percent of citywide land use (994 acres). Commercial uses are primarily concentrated in shopping centers such as the Moreno Valley Mall, TownGate, Moreno Valley Plaza, The District, Stoneridge Towne Center, Moreno Valley Auto Mall, Moreno Beach Plaza, Alessandro Plaza, and Sunnymead Towne Center. These areas include a mix of restaurants, retail stores, hotels, and personal services depending on the location. The Moreno Valley Mall and TownGate Highlands, Crossing, and Promenade at the western end of the city have the largest concentrations of commercial development.

Map Source: Dyett & Bhatia

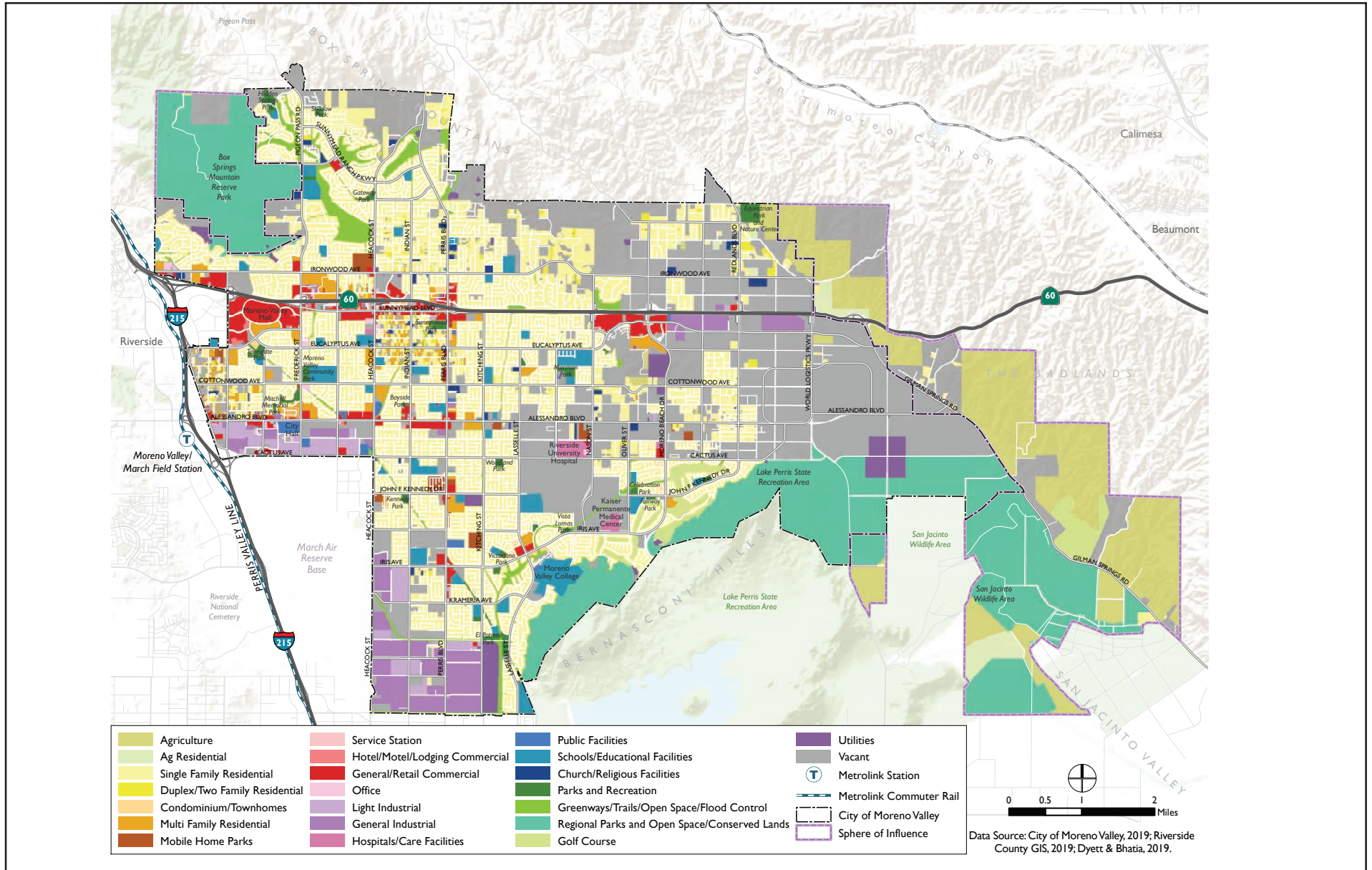


FIGURE 4.11-1  
Existing Land Use



Industrial land uses, including light industrial and general industrial, represent 3.7 percent (1,584 acres) of the Planning Area. Within the city limit, industrial land uses account for 4.8 percent of citywide land use (1,584 acres). Industrial land uses in Moreno Valley are clustered around three main areas:

- Between Alessandro Boulevard and Cactus Avenue, and Heacock Street and Elsworth Street (including the area formerly known as Centerpointe Business Park), as well as a number of larger warehouses extending toward the I-215 Frontage Road,
- Moreno Valley Industrial Area, and
- State Route 60 (SR-60) Business Park Area.

These existing industrial land uses are sited near the periphery of the city, proximate to freeway network access.

Public and Community Facilities land uses occupy 1,756 acres or approximately 4.1 percent of the Planning Area. Within the city limits, public and community facilities land uses account for 5.3 percent of citywide land use (1,752 acres). This includes a variety of public or semi-public lands, such as hospitals/care facilities, churches/religious facilities, schools/educational facilities, branches of government, and utilities. Schools/education facilities comprise the majority of this existing land use category with 866 acres of land, followed by utilities with 505 acres of land. The varied land uses of this category are dispersed throughout the city with more locations in the western and southern portions of the city.

Parks and Recreation land uses, including parks and recreation spaces, greenways and open space, conserved lands, and golf courses, comprise 8,317 acres or approximately 19.4 percent of the Planning Area. In the city, parks and recreation land uses account for about 12.54 percent of citywide land (4,100 acres), mostly conserved lands and greenways/open space. Moreno Valley has many parks such as Gateway Park, Sunnymead Park, Woodland Park, Kennedy Park, the Equestrian Park and Nature Center, and the Hound Town Dog Park. These parks and other recreation areas are dispersed throughout the city. Agriculture land accounts for approximately 3,969 acres or 9.2 percent of Planning Area. Almost all of the agriculture lands in the Planning Area are located to the east within the SOI, although there is very limited active agricultural production within the SOI. Agriculture accounts for less than 1 percent of land within the City, located primarily in the northern portion of the city above SR-60.

Vacant land accounts for 27 percent of the land within the city (8,902 acres). Vacant land is primarily located in the eastern part of the city, both north and south of SR-60; however, the following major approved/in-progress that are either partially constructed or as-yet unconstructed:

- Aquabella is a gated active-adult community approved for 2,900 dwelling units on 685 acres between Brodiaea Avenue and Iris Avenue, part of the Rancho Belago neighborhood. The Aquabella Specific Plan was adopted in 2005.

- The World Logistics Center (WLC) is a master-planned development encompassing up to 40.6 million square feet of building area specifically designed to support large-scale logistics operations. The WLC Specific Plan covers 2,610 acres (7.9 percent of citywide land) in the eastern portion of the city, south of SR-60.
- The partially constructed Moreno Valley Logistics Center is located in the southern portion of the city, south of Krameria Avenue, north of Cardinal Avenue, east of Heacock Street, and west of Indian Street. The Moreno Valley Logistics Center includes four buildings providing 1.7 million total square feet of building space on approximately 89 acres of land.
- The partially constructed Brodiaea Commerce Center is located in the central-western portion of the city north of Brodiaea Avenue, west of Heacock Street, and south of Alessandro Boulevard. The Brodiaea Commerce Center includes one industrial warehouse with approximately 262,000 square feet of building space on 12 acres of land.

### 4.11.1.2 Neighborhood Character

#### a. Topography and Views

Moreno Valley is located in Riverside County in an east-west oriented valley bordered by the Box Spring Mountain Range to the north, the Badlands Mountain Range, also known as San Timoteo Badlands, to the northeast, and the Bernasconi Hills with Lake Perris to the southeast. Moreno Valley connects to the San Jacinto Valley in the southeast between the Badlands Mountain Range and Bernasconi Hills. To the west, lower hill ranges including Sycamore Canyon are located between the cities of Riverside and Perris, and the Saddleback formation, which is part of the Santa Ana Mountain Range, lies further in the west beyond Lake Mathews. These topographic features provide numerous scenic vistas within the Planning Area.

Within the city, several hills and rock formations present natural landmarks, particularly on the eastern part of the city between Moreno Beach Drive and Nason Street, just south of the SR-60, at Alessandro Boulevard and Lasselle Street, and along the northern edge of the city near Ironwood Avenue. The terrain gradually slopes from north to south, starting from the northern mountain range to the southern border of the city with an elevation change of approximately 300 feet between SR-60 and Iris Avenue. The nearest mountain ranges, as well as the more distant San Bernardino Mountains, Santa Ana Mountains, and San Gabriel Mountains, are visible from many locations in the Planning Area, particularly higher elevations in the city. A notable landmark is the 3,083-foot-tall Box Springs Mountain on the northeast side of Moreno Valley, which features a prominent “M” marker at its peak facing Moreno Valley. The “M” is lit at night during holidays and special events.

## **b. Urban Structure**

Moreno Valley's structure is based on the north-south and east-west oriented one-square-mile gridiron plan laid out at the end of the nineteenth century as part of the settlement expansion to the American West. Much of this layout remains with some modifications, resulting in "superblocks" defined by major arterial roads. Most of Moreno Valley is organized in half-mile squares that are sometimes divided in half or four quarters by continuous roads, while some half-mile squares contain an irregular street grid within. One-mile squares or even larger blocks exist on the east side of the city.

A finer-grained urban fabric with a smaller street grid exists in the Sunnymead and Edgemont area, where Moreno Valley's development first started. The grid structure is broken up to follow the natural topography at the Lake Perris area in the southeast and along the northern hills and mountains. Although not located within the city limits, March Air Reserve Base (MARB) forms the southwestern edge of the city and the street grid ends at the Base's northern and eastern boundary. SR-60 traverses Moreno Valley in an east-west direction with most of the city located on the south side of the highway.

The city has a decentralized structure with commercial, retail, public, and institutional uses distributed across the Planning Area, typically located along major arterials and at intersections of major arterials. Large-scale retail centers are concentrated along SR-60, with smaller neighborhood retail centers interspersed throughout the city fabric. Residential uses are spread out within the grid pattern, mainly consisting of single-family home subdivisions, some older small parcel residential areas, as well as a number of multi-family complexes. Light Industrial areas are located along the southern boundaries near the MARB and south of SR-60 on the east side of the city and are home to a variety of industries including large-scale distribution centers.

Large areas of vacant land are located on the city's east side beyond Lasselle Street. Here, some areas still remain rural in character with stand-alone buildings or compounds accessed by narrow roads, which in some cases are unpaved roads. Open land, a limited amount of which is used for agriculture, is lining Gilman Springs Road at the eastern edge of the city.

Major open spaces are the Lake Perris Recreation Area at the southern edge of the city along the Bernasconi Hills and the Box Spring Mountain Reserve Park in the northwest. A unique feature is Juan Bautista de Anza Multi-Use Trail, formerly named Aqueduct Trail, which runs diagonally through the western part of the city along the underground California Aqueduct Pipeline from the Moreno Valley Mall to Lake Perris State Park.

## **c. Urban Form**

The city was formed in 1984, uniting the unincorporated communities of Sunnymead, Moreno, and Edgemont, during a time of significant growth. The regular street grid and amount of available land resulted in auto-oriented low-density development. Large single-family residential subdivisions were built in or within a portion of the half-mile square blocks or along the hillsides. Interspersed auto-oriented neighborhood retail centers serve these communities and are located along major four- or six-lane arterials. In the business and

industrial areas, very large distribution centers and warehouses with building footprints between 1 and 1.5 million square feet are common. Refer to Figure 4.11-2 for the distribution of retail centers and business parks in the city.

Existing structures within the Planning Area consist primarily of auto-oriented low-density development. With the exception of medical facility buildings, most buildings in Moreno Valley are one or two stories high, with some multi-family buildings or hotels going up to four stories. Large distributions centers have building heights of up to 50 to 60 feet and building lengths between 600 and 900 feet. The most significant source of light and glare occurs from artificial lights from buildings, including MARB in the southwestern portion of the Planning Area.

Block sizes are generally big and based on the half-mile grid system. Long distances between pedestrian crossings along arterials contribute to limited walkability but a finer grained street network of secondary streets, where interconnected, generates smaller block sizes within the half-mile grid system.

#### **d. Major Corridors**

**Alessandro Boulevard** is the main east-west corridor that runs across the entire city and stretches 8.3 miles between Interstate 215 (I-215) and Theodore Street. Several destinations and activity centers are located in proximity to Alessandro Boulevard: City Hall and business park uses on the west side, the public library at Kitching Street, several commercial shopping centers, and the Riverside University Health Systems Facility at Nason Street. Commercial and retail, single- and multi-family residential, public, churches, schools, industrial, office, and vacant land occupy this corridor. Building heights are low, with most buildings being one or two stories high. The Ridgeview multifamily residential development at Kitching Street includes 3-story buildings.

**Nason Street** is one of the main north-south corridors on the city's east side that connects to SR-60 runs for 3.6 miles between Ironwood Avenue to the north and Iris Avenue in the south. The extension between Cactus Avenue and Iris Avenue has been constructed in recent years. Nason Street connects to two larger destinations: the medical cluster, consisting of the Kaiser Permanente Medical Center at Iris Avenue and the Riverside University Health System Medical Center at Cactus Avenue, and a retail center formed by the Stoneridge Towne Center and Moreno Beach Shopping Center near SR-60. New single-family residential developments are under construction south of the Stoneridge Towne Center. Nason Street includes a mix of uses and development patterns, including single-family residential developments and stand-alone single-family homes, a big box shopping center, a mobile home park, a school complex on a combined site that includes a high school, middle school, and elementary school, three churches, and the two medical centers with associated medical offices. Except for the Kaiser Permanente Medical Center and the Riverside University Health System Medical Center, which include up to 6-story and 4-story high buildings respectively, heights are low, with most buildings being one or two stories high. Due to the block sizes and frontage conditions, Nason Street remains an auto-oriented corridor. Two bus lines serve portions of Nason Street between Eucalyptus and Cactus Avenue.



**Frederick Street**, located in the western part of the city, runs from SR-60 south for 2.1 miles to Cactus Avenue. It provides direct access to SR-60 and connects the Towngate retail district via Centerpointe Drive and Towngate Boulevard, Sunnymead Boulevard, Moreno Valley City Hall, and the Moreno Valley Conference Center at Alessandro Boulevard. Frederick is a four-lane road with a wide center median that accommodates both a landscaped median and left-turn lane or in some locations, two left-turn lanes in the stretch between Sunnymead Boulevard and Eucalyptus Avenue. Frederick Street is lined with a mix of residential developments including Towngate Plaza, Moreno Valley Community Park, a small golf course, offices, small neighborhood retail centers, gas stations, City Hall, and the Moreno Valley Conference and Recreation Center, as well as distribution and storage facilities at the south end of the street. Building heights vary between one and two stories for single-family residential buildings, one to three stories for apartment buildings, one to two stories for office buildings, and one story for retail buildings. City Hall is a 2-story building, and distribution and storage buildings are up to 50 feet high.

### **e. Neighborhoods**

Before the city experienced significant growth in the 1980s and became an incorporated city in 1984, three incorporated communities existed within current city limits: Edgemont, Sunnymead, and Moreno. Today, some of the original fabric is still recognizable, particularly in the area around Sunnymead Boulevard, which is characterized by smaller block and parcel sizes. Most of Moreno Valley's west side is developed with no clearly defined separation between Edgemont and Sunnymead.

**The Southwest Area** includes the west side of the city that includes the older Edgemont area, near the junction of SR-60 and I-215. Development along Alessandro Boulevard includes a mix of single-family residential areas, auto-oriented commercial centers, City Hall, other public facilities, and large distribution centers south of Alessandro Boulevard. Large-scale regional retail centers are located on the north side of Edgemont on both sides of State Route 60. Several shopping centers form the Towngate area: Canyon Spring Plaza, Towngate Highlands, Moreno Valley Mall, Towngate Crossing, Towngate Promenade, The Quarter, Towngate Square and Towngate Center. This area also includes several hotels up to four stories high. In the southern part of the Southwest Area are a business park area, civic uses, and some commercial uses including large distribution centers.

**The Central Area** is located east of Heacock Street and north of Alessandro Boulevard. It is situated along Sunnymead Boulevard and includes the older Sunnymead area. A finer-grained street grid creates smaller blocks in a quadrant south of Sunnymead Boulevard between Heacock Street, Perris Boulevard, and Dracaea Avenue. Similar to the older part of Edgemont, this area is characterized by stand-alone one-or two-story residential buildings. Commercial activity focuses on Sunnymead Boulevard and Alessandro Boulevard, with some neighborhood shopping centers also located at Perris Boulevard. A gateway sign to the east of the intersection with Frederick Street marks the entrance to the Sunnymead commercial area. The area has a large park, Sunnymead Park, at the corner of Fir Avenue and Perris Boulevard. Along Alessandro Boulevard, neighborhood shopping centers are auto-oriented with surface parking fronting the roadway. "The District" is a larger retail and business park

center on a 20-acre site with home improvement stores and smaller services that has recently been redeveloped. Generally, building heights in the Central Area are between one and two stories. Some multi-family buildings are three stories.

**Southeast Area** is generally the southeast portion of Moreno Valley. It features new schools, medical centers, stores, shopping centers and single-family and multi-family homes. It is located from Lasselle Road to the west, east to Gilman Springs Road, and from the southern City boundary with the Lake Perris State Recreation Area north to the northern city boundary, north of Ironwood Avenue and Locust Avenue. The majority of development has occurred in the western half of this area, with the eastern half remaining undeveloped. One exception is the Sketchers Factory Outlet and Distribution Warehouse on the south side of SR-60 in the eastern portion of the community. The Moreno Beach Plaza is also located on the south side of SR-60, to the west. The Riverside County Regional Medical Center and Riverside University Health System Medical Center are located at the northeast corner of Cactus Avenue and Nason Street.

Valley View High School, Mountain View Middle School, and Moreno Elementary School, and Riverside County Fire Station 99 are all located between Nason Street, Morrison Street, Cottonwood Avenue, and Eucalyptus Avenue, in the western portion of the area. Kaiser Permanente Moreno Valley, Moreno Valley College, Ridgecrest Elementary School, La Jolla Elementary School, Landmark Middle School, and Vista Del Lago High School are all located in the southwestern portion.

**The Northwest Area** is located at the foot of the Box Springs Mountain range, adjacent to Box Springs Mountain Reserve Park, which features open space, hiking trails and the Moreno Valley M. The Northwest Area community is entirely north of SR-60, with Ironwood Avenue and Manzanita Avenue forming the southern boundary, connected by the north/south running Heacock Street. The Northeast Area community is predominantly residential and features five elementary schools; Seneca Elementary School, Box Springs Elementary School, Honey Hollow Elementary School, Hidden Springs Elementary School, and Sugar Hill Elementary School. Canyon Springs High School is located on the east side of Pigeon Pass Road. The Northwest Area community is also served by Vista Heights Middle School. Other prominent land uses are Poorman's Reservoir and Sunnymead Ranch Lake Club. Local parks and neighborhood commercial land uses also serve the community.

**The South Area** is bounded by Alessandro Boulevard, Kitching Street, Heacock Street, and the industrial area to the south. The South Area community is located just east of Moreno Valley City Hall and March Air Reserve Base (MARB). This community features a mix of residential, commercial, and industrial land uses. Schools that serve this community are Chaparral Hills Elementary School, March Middle School, and Badger Springs Middle School. Several shopping centers are located on the south side of Alessandro Boulevard and at major intersections. There are also several distribution centers located in the southern portion of the community. John F. Kennedy Veteran's Memorial Park provides sports fields, tennis courts, and other recreational amenities. There are several large undeveloped parcels within the South Area community.

**The South Industrial Area** is located along the southern portion on both sides of Perris Boulevard. Land uses in the South Industrial Area are predominantly warehouse and distribution centers. The eastern portion of the South Industrial Area contains the Eastern Municipal Water District's Moreno Valley Regional Water Reclamation Facility, which on average treats 10.6 million gallons of wastewater per day. Large undeveloped lots remain within the South Industrial Area.

#### **4.11.1.3 Specific Plans**

A specific plan is a comprehensive planning and zoning document that implements the General Plan by providing a special set of development standards applied to a particular geographic area. Key specific plans are described below.

##### **a. The Moreno Valley Auto Mall Specific Plan (SP 209, SP 209 PH3)**

The Moreno Valley Auto Mall Specific Plan was prepared by a developer and adopted by the City in 1988, and has been amended. The planning area is approximately 140 acres of land located south of SR-60 at the Moreno Beach Drive off-ramp. The specific plan is intended to provide for the development of automobile sales uses, auto-related uses, and commercial uses. The General Plan designates the area as Commercial (C) on the General Plan Land Use Map.

The specific plan has resulted in the successful development of the Moreno Valley Auto Mall, the Inland Empire's largest dealership network. A KIA automobile dealer was recently approved for one of the remaining sites within the Auto Mall. Adjacent to the west of the Auto Mall, on the opposite side of Moreno Beach Drive, are portions of Moreno Beach Plaza (Walmart Supercenter location), which is located within a subsequent phase (SP 209 PH3) of the original specific plan. The Stoneridge Towne Center is located to the immediate west of Moreno Beach Plaza.

##### **b. Moreno Valley Industrial Area Specific Plan (SP 208)**

The Moreno Valley Industrial Area Specific Plan was prepared by the City and adopted in 1989, and has been subsequently amended. The planning area is approximately 1,380 acres in southwestern Moreno Valley adjacent to the March Air Reserve Base with I-215 located to the west. The Moreno Valley Industrial Area is envisioned as a major site for the development of industrial and related land uses, economic development, and expansion of its employment base. To date, this specific plan has resulted in large industrial buildings housing well-known companies such as Amazon, O'Reilly Auto Parts, Walgreens, Proctor and Gamble, and Ross. The Industrial Area Specific Plan Area is nearly built-out. Two development projects, the Moreno Valley Logistics Center (87 acres of vacant land) and the Indian Street Commerce Center (20 acres of already developed land), are in-progress.

##### **c. The Village Specific Plan (SP 204)**

The Village Specific Plan was prepared by the City and adopted in 1994 to cover a planning area of approximately 580 acres bounded by SR-60 to the north, Dracaea Avenue to the south, Frederick Street to the west, and Kitching Street to the east. The plan was developed as a



response to revitalize Sunnymead Boulevard and surrounding areas that were guided by the City's first specific plan in 1987 (Sunnymead Boulevard Plan). The overall goal of the Sunnymead Boulevard Plan and the Village Specific Plan is to promote and improve economic viability along the boulevard which acts as a freeway-oriented commercial focal point and provides a wide variety of office, retail, and service-related uses and employment opportunities.

#### **d. Sunnymead Ranch (SP 168)**

This specific plan was prepared by a developer and covers an area of approximately 880 acres known as Sunnymead Ranch in the northwestern portion of the city, with Pigeon Pass Road to the west and Perris Boulevard to the east. The vision was a high-quality planned neighborhood with residential and general/retail commercial uses. The majority of the planning area is built-out with single-family residences. The Lakeshore Village Marketplace, an 80,000-square-foot shopping center that was formerly anchored by a Ralph's grocery store until 2013, sits on a 14-acre parcel within this planning area.

#### **e. Moreno Valley Ranch Specific Plan (SP 193)**

This specific plan was prepared by a developer and adopted in 1986, and has been subsequently amended. The planning area is approximately 3,640 acres and is nearly built-out with Ranch single-family residences located in the southern portion of the city near the Lake Perris State Recreation Area. The plan has design guidelines for the development of the family-oriented community. The Moreno Valley campus of Riverside Community College is located within this planning area and the Kaiser Permanente Medical Center and some commercial areas are immediately adjacent. There is currently a multi-family project approved and under construction within the planning area and two that are approved but not yet constructed.

#### **f. Hidden Springs Specific Plan (SP 195)**

This specific plan was prepared by a developer and adopted in 1986 and includes approximately 340 acres of built-out single-family residential neighborhood development in the northwestern portion of the city adjacent with the Box Springs Mountain Reserve Park to the west and Pigeon Pass Road to the east.

#### **g. TownGate Specific Plan (SP 200)**

This specific plan was prepared by a developer and adopted in 1986. The planning area is approximately 500 acres located on the western portion of the city bounded by SR-60 to the north, Cottonwood Avenue to the south, and Frederick Street to the east. The planning area includes the Moreno Valley Mall, the city's major shopping center. More recent commercial developments in this planning area include TownGate Crossing, TownGate Promenade, TownGate Square, and TownGate Center/Plaza. New commercial/retail developments continue to this day. The Quarter project, which is a commercial development including two

hotels, is adjacent to the Specific Plan. The residential portions of the Specific Plan include single-family and multi-family are built-out.

#### **h. Festival Specific Plan (SP 205)**

This specific plan was prepared by a developer and adopted by the City in 1987 for mixed-use development with residential, retail/commercial, and office/commercial uses. The planning area is approximately 70 acres and is located on the north side of SR-60, east of Heacock Street, and south of Ironwood Avenue. The planning area allowed for general/retail commercial, including the existing shopping center. The plan was amended in early 2018 to allow a wider range of uses including Business Park/Light Industrial in some planning areas. The commercial center is now known as the District and redevelopment is underway with completion of a Floor and Décor which recently opened replacing a former big box tenant; the building had been vacant for nearly 25 years. Business Park uses (approximately 400,000 square feet on 19 acres) are under construction. A hotel is also approved within the southeastern portion of the Specific Plan just north of Route 60.

#### **i. Eastgate Ranch Specific Plan (SP 207)**

This specific plan was prepared by a developer and adopted by the city in 1991, and then amended in 2004. It includes approximately 150 acres of single-family residential neighborhood development near the Kaiser Permanente Medical Center bounded by Oliver Street to the west, Moreno Beach Drive to the east, Cactus Avenue to the north, and John F. Kennedy Drive to the south. La Jolla Elementary School and Celebration Park are located within this planning area. Landmark Middle School and Fairway Park are on the opposite side of John F. Kennedy Drive at the southern border of the Eastgate Ranch. This specific plan is completely built-out.

#### **j. Aquabella Specific Plan (SP 218)**

This specific plan was prepared by a developer and was adopted by the City in 2005 for the development of a gated active-adult community containing 2,900 dwelling units on approximately 730 acres near the Kaiser Permanente Medical Center between Brodiaea Avenue and Iris Avenue,. Site grading began two years following specific plan adoption but the project was put on hold due to economic recession and slowdown of the housing market.

#### **k. World Logistics Center Specific Plan**

The World Logistics Center Specific Plan was prepared by a developer and was adopted by the City in 2015. The WLC is a master-planned development encompassing up to 40.6 million square feet of building area specifically designed to support large-scale logistics operations. The WLC Specific Plan covers 2,610 acres (7.9 percent of citywide land) in the eastern portion of the city, bounded by SR-60 to the north, Cactus Avenue to the south, Redlands Boulevard to the west, and Gilman Springs Road to the east. The WLC Specific Plan implements all applicable elements of the General Plan and includes detailed information about the area's

infrastructure improvements such as roads, water, sewer, utilities, and flood control facilities.

## 4.11.2 Applicable Regulatory Requirements

This section describes the various planning documents and local planning initiatives that affect the Planning Area.

### 4.11.2.1 State and Regional

#### a. Riverside County General Plan

Within the SOI in the Planning Area lies 9,919 acres of land (23 percent of total Planning Area) that is currently unincorporated and under the direction of the Riverside County General Plan. The City of Moreno Valley General Plan has authority over territory within the city limit, while the Riverside County General Plan has jurisdiction over unincorporated territory within the County. Lands within Moreno Valley's sphere of influence can be given land use designations by both the City and the County, but the City's designation applies only if the land is annexed into the city, otherwise, the County's designation/plans prevail. The majority of the unincorporated Planning Area is designated by Riverside County as Open Space Rural, Conservation Habitat, and Conservation. Small pockets of Commercial Retail and Light Industrial designations are located adjacent Gilman Springs Road at the city's eastern limits, adjacent to the approved World Logistics Center.

#### b. March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan

In November 2014, the Riverside County Airport Land Use Commission adopted the Airport Land Use Compatibility Plan (ALUCP) for the March Air Reserve Base/Inland Port Airport (MARB/IPA) located adjacent to the southwestern boundary of the city. The ALUCP is primarily based upon the U.S. Air Force's *Air Installation Compatibility Use Zones Study* for the March Air Reserve Base (AICUZ). The ALUCP incorporates noise and safety protection measures equivalent to or greater than recommended in the AICUZ. While no modifications to the existing airport runways or approaches are anticipated, the ALUCP studied potential future military and civilian aircraft activity to inform the development of unique Airport Compatibility Zones each with their own land use restrictions in consideration of projected future use by both military and civilian aircraft. The compatibility zones and their associated restrictions plan for noise and overflight factors as well as safety and airspace protection factors.

Within the city limit, there is a special zoning overlay for the AICUZ with the following description: *It is the intent and purpose of this AICUZ overlay district to limit public exposure to aircraft accidents and noise and to encourage future development that is compatible with the continued operation of March Air Force Base.* The ALUCP's Airport Compatibility Zones that occur within the city limit are summarized as follows and depicted in Figure 4.9-2.

**Zone A – Clear Zone**

- Acreage within city limit: 47.8 acres (approximate)
- Residential Land Use: No new dwellings allowed
- Prohibited Land Uses: All non-aeronautical structures; assemblages of people; objects exceeding Federal Aviation Regulations' height limits (Part 77); all storage of hazardous materials; hazards to flight

**Zone B1 – Inner Approach/Departure Zone**

- Acreage within city limit: 164.1 acres (approximate)
- Residential Land Use: No new dwellings allowed
- Prohibited Land Uses: Children's schools, day care centers, libraries; hospitals, congregate care facilities, hotels/motels, restaurants, places of assembly; buildings with greater than 1 aboveground habitable floor in Accident Prone Zone (APZ) I or greater than 2 floors in APZ II and outside of APZs; hazardous materials manufacture/storage; noise sensitive outdoor non-residential uses; critical community infrastructure facilities; hazards to flight; uses listed in AICUZ as not compatible in APZ I or APZ II

**Zone B2 – High Noise Zone**

- Acreage within city limit: 210.4 acres (approximate)
- Residential Land Use: No new dwellings allowed
- Prohibited Land Uses: Children's schools, day care centers, libraries; hospitals, congregate care facilities, hotels/motels, places of assembly; buildings with greater than 3 aboveground habitable floors; noise sensitive outdoor non-residential uses; critical community infrastructure facilities; hazards to flight

**Zone C1 – Primary Approach/Departure Zone**

- Acreage within city limit: 656.8 acres (approximate)
- Residential Land Use: Less than or equal to 3.0 dwelling units per acre
- Prohibited Land Uses: Children's schools, day care centers, libraries; hospitals, congregate care facilities, places of assembly; noise-sensitive outdoor non-residential uses; hazards to flight

**Zone D – Flight Corridor Buffer**

- Acreage within city limit: 2,069.1 acres (approximate)
- Residential Land Use: No limit
- Prohibited Land Uses: Hazards to flight

### **Zone E – Other Airport Environs**

- Acreage within city limit: 6,093.5 acres (approximate)
- Residential Land Use: No limit
- Prohibited Land Uses: Hazards to flight

### **High Terrain Zone**

- Acreage within city limit 1,848.2 acres (approximate)
- Residential Land Use: Same as underlying zone
- Prohibited Land Uses: Hazards to flight; other uses restricted in accordance with criteria for underlying zone

Within the city limit, there are approximately 657 acres of land within Zone C1. The current land uses in Zone C1 include general/light industrial, general/retail commercial, office, public facilities, single-family residential, multi-family residential, church/religious facilities, limited and vacant land. Existing residential area in Zone C1 represents approximately 95 acres, detailed below with maximum density limits for dwelling units per acre (du/ac).

- Residential 30 (R30 – 30 du/ac): 17 acres
- Residential 15 (R15 – 15 du/ac): 30.63 acres
- Residential 10 (R10 – 10 du/ac): 38.42 acres
- Residential 5 (R5 – 5 du/ac): 9.03 acres

## **4.11.2.2 Local Plans and Projects**

### **a. Momentum MoVal (2016)**

In 2016, the City adopted Momentum MoVal, the City's first Strategic Plan to guide the community's growth in a three to five year timeframe from 2016 forwards. The City's top priorities are grouped into six categories: Economic Development; Library; Public Safety; Infrastructure; Youth Programs; and Beautification, Community Engagement, and Quality of Life. Through the General Plan Update process, the priorities identified in Momentum MoVal will be incorporated to guide the community's growth, with particular attention to land use, towards year 2040.

Momentum MoVal prioritized the establishment of the city as the worldwide model in logistics development and promoted small business development and entrepreneurship. As such, the quantity, location, and character of general/light industrial and commercial/office land uses will require consideration. Through project outreach, some community members have relayed desires for increased library services—this could potentially translate into plans for increased service/facilities on existing library sites or entirely new sites. The plan identifies that quality of life and community interaction should be enhanced through the creation of a town center that offers “Third Space” gathering opportunities outside of the workplace or home to encourage social exchange in a live, work, and play atmosphere.

## **b. Alessandro Boulevard Corridor Vision Plan**

The Alessandro Boulevard Corridor Vision Plan (2010) focuses on the properties fronting the Alessandro Boulevard corridor between Old Highway 215 to the west and Nason Street to the east, a distance of approximately 5.5 miles. The plan also discusses adjacent properties to the north and south within a half mile of the corridor, specifically their role in and benefit from revitalization of the corridor that has a mix of vacant properties, general/retail commercial, single/multi-family residential, general/light industrial, and public facilities such as the Moreno Valley City Hall. The plan envisions a series of transit-ready nodes served by a planned Bus Rapid Transit (BRT) line extending from Nason Street to the Metrolink Station along I-215. Residential uses of the planning area include primarily existing single-family residences and some multi-family residences that are located generally immediately adjacent to Alessandro Boulevard. Retail and restaurant uses focused at transit-ready nodes are encouraged if higher levels of change are desired. Streetscape improvements focused on active transportation, such as walking and biking, and beautified landscaping are also highlighted by the plan.

## **c. SR-60 Corridor Study**

The SR-60 Corridor Study (2014) is a vision for the SR-60 highway corridor stretching from Nason Street east to Theodore Street. The City has received this study, but it has not been adopted. The plan identifies land use scenarios, including strategies connecting surrounding land uses, and supports a pedestrian oriented development scenario along the regional transit corridor. This plan only includes a small area of land at Nason Street and SR-60, the planning process highlighted the gap in developed walkable town center places in Moreno Valley and the community's desire for having such places locally. The land use vision of the plan is organized into four areas, summarized below.

- Area 1: Single-family residential uses, commercial uses focused on retail but allowing office; storm water detention basins to provide visual/physical buffer for residences/freeway and potential recreation area for nearby residents
- Area 2: commercial retail uses for additional car dealerships for Moreno Valley Auto Mall expansion; industrial and logistics uses along Eucalyptus Avenue; multi-family residential uses between the industrial uses and Auto Mall expansion
- Area 3: area remains commercial and includes one hotel and dine-in restaurants; a portion of Area 3 has subsequently been developed as a Hyundai dealership; the other pads remain vacant
- Area 4: experiential commercial uses that attract residents and visitors; office commercial uses; hotel; single and multi-family residential uses

## **d. Nason Street Corridor Plan**

The Nason Street Corridor Plan (2015) covers a planning area of approximately 2,133 acres and has overlapping areas from the Alessandro Boulevard Corridor Vision Plan (2010) and

the SR-60 Plan (2014). The City has received this plan, but it has not been adopted. These earlier plans were the first two pieces in creating a connected city center in Moreno Valley and the Nason Street Corridor Plan (2015) is the integrating plan that joins the three central areas and their land use plans within Moreno Valley and creates concepts for design and a way to implement in the future. The 2015 Nason Street Corridor Plan envisions the planning area as a town center, a mixed-use district that includes a combination of various land use types such as vertical mixed-use, retail, office, public parks and plazas, civic uses, and a mix of residential types. Within the planning area, the City owns approximately 60 acres of vacant land at the northwest corner of Nason Street and Alessandro Boulevard, adjacent to multiple vacant, privately-owned parcels. The focus of the Nason Street Corridor Plan is on the City-owned property and the parcels bounded by Nason Street, Alessandro Boulevard, and Cottonwood Avenue. The City-owned property is the planning area for Destination MoVal: Town Center (2019), a recent planning effort discussed below.

### **e. Destination MoVal Town Center**

Destination MoVal: Town Center (2019) is a City of Moreno initiated project that published a Request for Proposals (RFP) in November 2019 to transform an approximately 56.42-acre City-owned site at the northwest corner of Nason Street and Alessandro Boulevard. Surrounded by the city's expanding medical corridor, the land use vision for the town center is a new landmark and identity for Moreno Valley—a vibrant, walkable downtown scene that attracts residents, daytime professionals, and visitors to experience a high-quality work/shop/stay/play atmosphere. Residential (apartments and/or condominiums) and corporate headquarter(s) campus are considered acceptable, flexible land use types. The City desires to enter into a Public-Private Partnership in order to achieve sustainable long-term economic and community benefits. The City would sell its acreage to a project that would be developed consistent with the City Council's vision at private expense.

### **f. Gateway and Streetscape Framework Plan**

The Gateway & Streetscape Framework Plan (2019) describes the hierarchy of city gateway entrances, along with concepts and strategies that can foster enhancement of the city's curb appeal, such as improved landscaping, monument signage, expansion of medians, and crosswalk and sidewalk treatment. Five categories of recommendations are offered: Gateway Treatment and Streetscape Policies, Partnering with Local Agencies, Landscaping Standards and Maintenance, Place Making and Branding, and Capital Improvements. The recommendations presented are intended to help foster economic growth and investment in the city. The Gateway & Streetscape Framework Plan is a planning tool, not a regulatory document, and is not a final implementation plan. The concepts and strategies would be considered over an extended period (e.g., 20 years) and implemented only if and where funding resources are available and authorized. This document serves as a valuable, informative resource for the General Plan Update.

### **g. Kaiser Permanente Moreno Valley Medical Center Master Plan**

The Kaiser Permanente Moreno Valley Medical Center Master Plan Project is an expansion of the existing medical center campus on 30 acres of land located in the southern portion of the city on the north side of Iris Avenue, west of Oliver Street, and east of Nason Street. The project includes a multi-phased, state-of-the-art medical center campus anticipated for realization by 2038. Highlighted developments include an approximately 460-bed hospital, hospital support buildings, outpatient medical office buildings, an energy center, and surface and structured parking. This plan/project is located within the city's Medical Use Overlay (MUO) District. The primary purpose of the MUO District is to create a medical corridor by limiting land uses to those that are supportive of and compatible with the city's two existing hospitals. Through the General Plan Update process, the plan for a town center can be linked to the city's expanding medical corridor for mutually beneficial synergy. Applications for the Kaiser Master Plan Project are currently in the review process, and are expected to be considered by decision makers in 2020.

### **h. Moreno Valley College Comprehensive Master Plan**

The Moreno Valley College Comprehensive Master Plan describes the college's long-term education and facilities visions from 2019-2030. The Facilities Master Plan—one of two separate master plans that form the Comprehensive Master Plan—addresses the college's infrastructure/facilities needs. The plan identifies approximately 400,000 gross square feet of new construction and 55,000 gross square feet of building reconstruction at the college campus located south of Iris Avenue, east of Lasselle Street, and north of the Lake Perris Recreation Area.

## **4.11.3 Methodologies for Determining Impacts**

Preparation of this section was based on review of existing land use conditions in the city including aerial images and geographical information systems (GIS) land use data available for the Planning Area. This was followed by an evaluation of how the proposed GPU land use, goals and policies would affect existing land uses within the Planning Area.

## **4.11.4 Basis for Determining Significance**

Thresholds used to evaluate impacts related to land use/planning are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact related to land use would occur if the project would:

- 1) Physically divide an established community; or
- 2) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.



## 4.11.5 Impact Analysis

### 4.11.5.1 Topic 1: Physically Divide an Established Community

*Would the project physically divide an established community?*

Implementation of the project would not include new major infrastructure such as a freeway that could physically divide an established community. Currently, approximately 32 percent of the land within the city limit is vacant. Vacant lands include large undeveloped tracts of land at the interior of the city near the hospital complexes and vacant parcels interspersed among existing urban development. The project would primarily focus future development and redevelopment within the proposed Concept Areas, which consist of clusters of vacant and underutilized land within the city limit. Future development and redevelopment would utilize existing transportation facilities and would provide opportunities for new employment, housing, and recreational uses within the existing community framework. The changes envisioned within the proposed land use plan and supporting policies are designed to provide more opportunities for social connections and community. Therefore, the project would not physically divide the community, and impacts would be less than significant.

### 4.11.5.2 Topic 2: Conflicts with Applicable Plans and Policies

*Would the project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Buildout of the project would result in development of approximately 22,052 new homes and approximately 38,915 new jobs by 2040. As the project is a comprehensive update to the City's existing 2006 General Plan, the purpose of the plan is to guide development into the future based on the vision established through the planning process. As detailed in Section 4.11.2.2, there are a number of local planning initiatives and projects that have identified specific goals for the City, or would shape land uses within the city as they are buildout. All of these prior planning efforts and approved projects were considered during development of the 2021 GPU, and many of those prior goals are reflected in the proposed policy framework. For example, the 2021 GPU implements Momentum MoVal by prioritizing economic development and logistics development in the City, along with providing a land use plan that prioritizes creation of town centers and gathering spaces to encourage social exchange in a live, work, and play atmosphere.

In addition to the 2021 GPU, the project includes adoption of a CAP. The 2021 GPU land use plan and policy framework has been established to support implementation of the CAP and ensure internal consistency between the plans. For example, by planning for approximately 22,052 new homes and 38,915 new jobs by 2040, the jobs to housing balance should improve, providing a balance of jobs and housing in the community that would allow more city residents to work locally, cutting down commute times, vehicle miles traveled, and GHG emissions. The project identifies housing sites necessary to meet Regional Housing Needs Allocation (RHNA) goals and ensure consistency with the state housing targets. Project

buildout would result in a total of 72,737 households in 2040, which would be less than the 2040 SCAG household projection of 73,000. Similarly, the project's projected population size of 252,179 would be less than the 2040 SCAG projection of 256,600. This difference in population is due to the greater share of multi-family units that would likely result under buildout of the project compared to buildout of the existing 2006 General Plan, as multi-family units typically have a lower household population. The project would slightly increase the number of jobs to 83,246 compared to the SCAG 2040 growth projection of 83,200. However, this slight increase in approximately 46 jobs would have a negligible effect on future growth that would be offset by the decrease in population and households compared to SCAG 2040 growth projections. Consequently, the project would not generate growth that would exceed 2040 SCAG projections. Furthermore, the project would be subject to the following goals, policies, and actions in the 2021 GPU Land Use and Community Character (LCC) Element.

### ***Goal***

LCC-1: Establish an identifiable city structure and a flexible land use framework that accommodates growth and development over the planning horizon.

### **Identifiable Structure**

#### ***Policies***

- LCC.1-1 Foster a balanced mix of employment, housing, educational, entertainment, and recreational uses throughout the city to support a complete community.
- LCC.1-2 Expand employment opportunities locally and provide sufficient lands for commercial, industrial, residential and public/quasi-public uses while ensuring that a high quality of life is maintained in Moreno Valley.
- LCC.1-3 Locate manufacturing, logistics and industrial uses in areas with good access to the regional transportation network near the periphery of the city.
- LCC.1-4 Focus new development in centers and corridors so as to support the vitality of existing businesses, optimize the use of utility infrastructure, and reduce vehicle trip frequency, length, and associated emissions.
- LCC.1-5 Encourage mixed use development in either a vertical or horizontal configuration in the Downtown Center, the Moreno Valley Mall/Towngate Center area, and at key intersections along major transit routes.
- LCC.1-6 Promote infill development along Alessandro, Sunnymead, and Perris to create mixed use corridors with a range of housing types at mid-to-high densities along their lengths and activity nodes at key intersections with re-tail/commercial uses to serve the daily needs of local residents.

LCC.1-7 Support the continued buildout of residential areas as needed to meet the community's housing needs.

***Actions***

LCC.1-A Use development agreements, impact fees, benefit districts and other mechanisms to ensure the provision of adequate infrastructure to serve new development.

**Growth Management**

***Policies***

LCC.1-8 Promote a land and resource efficient development pattern in order to support efficient delivery of public services and infrastructure, conserve open space lands surrounding the city, reduce vehicle trip lengths and improve air quality.

LCC.1-9 Maintain City boundaries that are logical in terms of City service capabilities, economic development needs, social and economic interdependencies, citizen desires, and City costs and revenues.

LCC.1-10 Plan comprehensively for the annexation of any new areas and approve annexation only after City approval of an appropriate area-wide plan (e.g., master plan, specific plan) that addresses land use, circulation, housing, infrastructure, and public facilities and services. Exceptions to this requirement for area-wide plans include annexations of:

- Existing developed areas;
- Areas of less than five acres; and
- Housing developments for very-low and low-income households.

LCC.1-11 Require that new development be compatible with the standards for land uses, density and intensity specified in the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (March ALUC Plan).

LCC.1-12 Balance levels of employment and housing within the community to provide more opportunities for Moreno Valley residents to work locally, cut com-mute times, and improve air quality.

***Actions***

LCC.1-B Map all planning actions, such as rezonings on a large display map, keyed to the year action was taken. Use this map to pinpoint areas which re-quire special studies and possible amendment on the General Plan land use map.

***Goal***

LCC-2: Foster vibrant gathering places for Marino Valley residents and visitors.

***Policies***

- LCC.2-1 Create a Downtown Center with a vibrant mix of uses that will serve as the primary hub and focal point of Moreno Valley economic and cultural engine in the region.
- LCC.2-2 Require that proposed projects in the Downtown Center prepare an area plan demonstrating consistency with the principles outlined in Table LCC-2 and the illustrative development program shown in Table LCC-3 prior to approval. Development on smaller parcels may satisfy this requirement with a site plan.
- LCC.2-3 Within the Downtown Center, ensure the high intensity of development is concentrated so as to create a central core with a mix of uses to activate it throughout the day and evening and to promote strong connectivity between new uses and RUMC, Aquabella, and the Kaiser hospital campus.
- LCC.2-4 Leverage the presence of the hospitals and large tracts of vacant land to attract new higher-wage employers to the Downtown Center.
- LCC.2-5 Integrate new employment-oriented uses into the fabric of the Downtown Center as employment, educational, corporate, and research campuses and/or as part of mixed use developments.
- LCC.2-6 Create a Central Park facility to serve as a defining feature of the Downtown Center.
- LCC.2-7 Recognize recreation and entertainment as key contributors to the vitality of the Downtown Center and accommodate a world class sports/recreational facility to provide activities and entertainment for Moreno Valley residents.
- LCC.2-8 Transform Nason Street and Alessandro Boulevard into a grand boulevard with a distinctive, inviting character that announces arrival in Downtown Moreno Valley.
- LCC.2-9 Support the vitality of commercial and retail development downtown with significant new housing in and adjacent to the Downtown Center.
- LCC.2-10 Create an attractive, safe environment for bicycles and pedestrians that promotes "micro-mobility" and connectivity within the Downtown Center as well as encourage electric and autonomous vehicles.
- LCC.2-11 Allow for the evolution of the Downtown Center and encourage site planning that facilitates redevelopment of sites within the core of the area in the future as land values increase and higher development intensities become more financially feasible.
- LCC.2-12 Introduce medium to high density housing to the site and provide town-homes, apartments, and condominiums that cater to the needs of residents of all ages and stages of life.

- LCC.2-13 Allow the maximum permitted FAR to be calculated across multiple parcels in a single proposed development at the Moreno Valley Mall in order to incentivize signature development that makes a positive contribution to community character at this prominent gateway site.
- LCC.2-14 Focus on attracting essential services to the site, such as medical clinics, a grocery store, banks, and dry cleaners to the site to provide for the needs of area residents and ensure the vitality of the site over time.
- LCC.2-15 Encourage mixed use development and the co-location of residential and commercial uses within sight distance of one another on the site to promote day and evening vitality.
- LCC.2-16 Design residential buildings adjacent to the freeway with adequate ventilation and sound proofing to minimize air and noise impacts.
- LCC.2-17 Provide restaurants, cafes and bars with terraces, as well as public plazas, parks, public art, and family-friendly amenities that activate public spaces and build sense of place.
- LCC.2-18 Design and build new internal roadways with narrower widths, ample sidewalks, and street parking to help create a more intimate walkable feel in the areas.
- LCC.2-19 Provide a network of interconnected streets, paseos, pathways, and bicycle routes onsite that facilitates travel through the site for pedestrians, cyclists and other non-motorized modes of transportation.
- LCC.2-20 Encourage site designs that create an active street frontage and screen parking from the frontages of Alessandro, Sunnymead and Perris.
- LCC.2-21 Orient residential uses to the street and discourage the use of walls and fences. Employ a variety of techniques to buffer residential uses on the corridors from traffic and noise, including setbacks, landscaping, stoops, and raised entries.
- LCC.2-22 Encourage new mixed-use and commercial development to incorporate visual quality and interest in architectural design on all visible sides of buildings through the following approaches:
- Utilizing varied massing and roof types, floor plans, detailed planting design, or color and materials;
  - Maintaining overall harmony while providing smaller-scale variety; and
  - Articulating building facades with distinctive architectural features like awnings, windows, doors, and other such elements.
- LCC.2-23 Ensure that commercial uses are designed to incorporate ground floor transparency and pedestrian activity.

LCC.2-24 At intersections on the mixed use corridors, prioritize retail and other uses that promote pedestrian activity on the ground floor of buildings.

LCC.2-25 Encourage the development of bicycle, pedestrian, and transit access that reduces the need for on-site parking. Improve the pedestrian experience within these corridors through street trees and landscaping.

LCC.2-26 Provide streetscape improvements along the mixed use corridors of Alessandro, Sunnymead, and Perris to enhance livability, vitality, and safety for all modes of travel.

LCC.2-27 Where possible, require that adjacent uses share driveways in order to limit the number of curb cuts along Alessandro, Sunnymead, Nason, and Perris.

LCC.2-28 Encourage landscaped common public spaces to be incorporated into new mixed-use development.

LCC.2-29 Design of public spaces should ensure they are:

- Lined with active uses at-grade and located near building entrances, windows, outdoor seating, patios, or balconies that overlook park spaces, and other areas with strong pedestrian activity.
- Be completely visible from at least one street frontage and as feasible, be at least 50% visible from a secondary street frontage.
- Primarily defined by adjacent buildings, which will contribute to the unity and environmental quality of the space.
- be located at the same grade level as the public sidewalk when possible. Where changes in grade are an important element of the overall design and programming, clear and direct access from the public sidewalk should be accommodated, and universal accessibility provided.
- Reflect the design and placemaking elements of the surrounding area through the use of architectural styles, signage, colors, textures, materials and other elements.
- Be constructed with low impact and permeable paving materials to efficiently manage the stormwater and minimize the area's heat island effect.
- Connect to bike and pedestrian facilities and be a part of an inter-connected pathway or parkway system where feasible.

LCC.2-30 Establish parks and plazas to serve as meeting areas in new neighborhoods and ensure a safe and secure environment through the development review and approval process.

LCC.2-31 Support development of the Moreno Valley College campus in ways that both strengthen its ties to the community and enhance its status as a major activity center for the neighborhood.

***Actions***

LCC.2-A Establish flexible zoning regulations to guide development in the Downtown Center.

LCC.2-B Prioritize the completion of catalyst projects for the Downtown Center, including the Town Center development at Nason and Alessandro and the Aquabella Specific Plan.

LCC.2-C Work with property owners at the Moreno Valley Mall and Towngate Center to facilitate redevelopment of underutilized parcels.

***Goal***

LCC-3: Build a distinctive sense of place and pride in Moreno Valley.

**General**

***Policies***

LCC.3-1 Insist on high-quality development that is sensitive to surrounding context throughout the city and particularly in centers and corridors.

LCC.3-2 Use development standards to ensure smooth transitions for areas that border one another so that neighborhoods and districts maintain their unique qualities while being compatible with one another.

LCC.3-3 Promote the Moreno Valley College as a community asset that contributes to local identity and seek to better integrate the College with the rest of the city, including the Downtown Center and adjacent neighborhoods through urban design, transportation linkages, and promotion of College events.

**Gateways**

***Policies***

LCC.3-4 Strengthen the sense of arrival into Moreno Valley and the Downtown Center with gateway design at the locations shown on Figure LCC-4. Gateway design elements shall include streetscape design, signage, building massing, and similarly-themed design elements.

LCC.3-5 Incorporate prominent corner architectural features, such as prominent entries or corner towers, on new development at key intersections or gate-ways.

LCC.3-6 Maintain continuity in streetscape design along major streets and avenues that traverse the city north to south and east to west.

LCC.3-7 Continue to support community identity with streetscape improvement and beautification projects in both existing residential areas and commercial centers, as well as new mixed-use areas that incorporate unified landscaping and pedestrian amenities. Amenities should include bus shelters, pedestrian safety treatments such as sidewalk bulb-outs and widening and improved crosswalks, and city-branded decorative elements such as street lighting, concrete pavers, tree grates, and theme rails.

### ***Actions***

LCC.3-A Establish a unified gateway design palette and guidelines that address streetscape design, signage, lighting, and building massing and setbacks to heighten sense of place.

LCC.3-B Develop a program of branding, signage, and wayfinding to promote connections with Lake Perris. The program should apply on key access routes to Lake Perris, including Moreno Beach Drive, Alessandro and Cactus and should seek to build visual connections and foster land uses and businesses that encourage recreational activities.

### **Arts and Culture**

#### ***Policies***

LCC.3-8 Encourage development and display of public art to promote the history, heritage, culture and contemporary identity of Moreno Valley.

LCC.3-9 Promote cooperative arrangements with other public or private agencies that facilitate the temporary or permanent display of works of art for display within or upon public or private facilities and land.

#### ***Actions***

LCC.3-C Consider establishing a public art ordinance that would require large projects to install public art or contribute an in lieu fee that can be put toward the cost of public art installations.

LCC.3-D Continue to support and fund local artists and students to create public art.

LCC.3-E Explore a range of public and private funding sources to support the visual and performing arts and cultural development goals and activities.



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## **Historic Resources**

### ***Policies***

- LCC.3-10 Balance the preservation of historic resources with the desire of property owners of historic structures to adopt energy efficient strategies.
- LCC.3-11 Require any application that would alter or demolish an undesignated and unsurveyed resource over 50-years-old to be assessed on the merits of the structure.

## **Residential Areas**

### ***Policies***

- LCC.3-12 Promote the preservation, maintenance, and improvement of property through code enforcement to mitigate or eliminate deterioration and blight conditions, and to help encourage new development and reinvestment.
- LCC.3-13 New and retrofitted fences and walls should incorporate landscape elements and changes in materials or texture to deter graffiti and add visual interest.
- LCC.3-14 Within individual residential projects, a variety of floor plans and elevations should be offered.
- LCC.3-15 Encourage building placement variations, roofline variations, architectural projections, and other embellishments to enhance the visual interest along residential streets.
- LCC.3-16 Design large-scale small lot single family and multiple family residential projects to group dwellings around individual open space and/or recreational features.
- LCC.3-17 Screen and buffer nonresidential projects to protect adjacent residential property and other sensitive land uses when necessary to mitigate noise, glare and other adverse effects on adjacent uses.
- LCC.3-18 Design internal roadways so that direct access is available to all structures visible from a particular parking area entrance in order to eliminate unnecessary vehicle travel, and to improve emergency response.

### ***Actions***

- LCC.3-F Establish residential design guidelines for single-family and multi-family development that address site design, building materials, roof lines, and landscaping.

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## **Commercial Areas**

### ***Policies***

- LCC.3-19 Ensure that neighborhood shopping centers are designed in a manner compatible with adjacent residential areas.
- LCC.3-20 Rely on strong landscape treatments, setbacks, sign controls, and, where feasible, underground utilities and street improvements to prevent visual chaos where businesses are competing for attention.
- LCC.3-21 Ensure that neighborhood shopping centers conform to regulations limiting the size, location, and general character of signage and facades so as not to disrupt the residential character of the neighborhood.
- LCC.3-22 Preserve and encourage neighborhood stores that enable shoppers to walk or bike for everyday needs, provide access to healthy foods, and promote a sense of community.
- LCC.3-23 Require reciprocal parking and access agreements between individual parcels where practical.

### ***Actions***

- LCC.3-G Work with existing business owners to promote the improvement and maintenance of facades of commercial uses.
- LCC.3-H Pursue funding and programs to underground utilities and overhead wires.

### ***Goal***

- LLC-4: Expand the range of housing types in Moreno Valley and ensure a variety of options to suit the needs of people of all ages and income levels.

### ***Policies***

- LCC.4-1 Promote a range of residential densities throughout the community to encourage a mix of housing types in varying price ranges and rental rates.
- LCC.4-2 Promote the development of a greater variety of housing types, including single-family homes on small lots, accessory dwelling units, townhomes, lofts, live-work spaces, and senior and student housing to meet the needs of future demographics and changing family sizes.
- LCC.4-3 Encourage a mix of for sale and rental housing units in centers and corridors.

- LCC.4-4 Encourage multi-family developments and live-work units in residential mixed use areas to provide housing options that are affordable for artists, creative entrepreneurs, emerging industries, and home-based business operators.
- LCC.4-5 Encourage the use of innovative and cost-effective building materials, site design practices and energy and water conservation measures to conserve resources and reduce the cost of residential development.
- LCC.4-6 Cater to the needs of larger, multi-generational families by both promoting the development of 3 and 4-bedroom homes and by facilitating construction of accessory dwelling units.
- LCC.4-7 Promote availability of senior and independent assisted living facilities distributed equitably throughout the community to meet the needs of the community's aging population.
- LCC.4-8 Facilitate opportunities to incorporate innovative design and program features into affordable housing developments, such as on-site health and human services, community gardens, car-sharing, and bike facilities. Support the development of projects that serve homeless and special needs populations.
- LCC.4-9 Densities in excess of the maximum allowable density for residential projects may be permitted pursuant to California density bonus law.

Therefore, the project would not cause a significant environmental impact due to a conflict with any applicable plans, policies, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

### **a. Specific Plans**

Implementation of the 2021 GPU would be consistent with specific plans, as the 2021 GPU would provide an updated guide for development within specific plan areas with remaining development potential. Some of the proposed Concept Areas where growth is focused have specific plans that have already been approved. In areas where existing specific plans have been newly adopted, or where unbuilt capacity remains and circumstances have not changed, including industrial areas in the east and southwest of the city, the 2021 GPU envisions continued implementation of the adopted specific plans. Where existing specific plan areas have achieved their useful life, or there is no specific plan in place, the 2021 GPU presents a vision and a set of policies and actions to implement the plan based on community input. Outside of the Concept Areas and specific plan areas, the 2021 GPU envisions new development on vacant parcels in a manner consistent with the existing land use pattern and character of the surrounding area.

For example, within the planned Downtown Center, approximately 80 percent of the land is vacant and undeveloped, including the 730-acre Aquabella Specific Plan area and a 56-acre parcel at the northwest corner of Nason and Alessandro owned by the City. The 2021 GPU envisions the integration of the Aquabella Specific Plan area into the Downtown Center,

allowing for development of supportive medical facilities, a hotel, and shops and services oriented to patients and their families adjacent to the hospitals, while also permitting development of the low-to-mid density development consistent with the underlying zoning for the Specific Plan Area. No conflicts have been identified between the 2021 GPU and Specific Plans, and impacts would be less than significant.

### **b. County of Riverside General Plan**

As discussed in Section 4.2.1.1 above, the Riverside County General Plan has jurisdiction over unincorporated territory within the County, including lands within the City's SOI. Although the 2021 GPU identifies land use designations within the City's sphere that are not consistent with the Riverside County General Plan, no conflicts would occur because the Riverside County General Plan would continue to apply until such time that an annexation were to occur to bring lands into the City boundary. Therefore, the 2021 GPU would not conflict with the Riverside County General Plan, and impacts would be less than significant.

### **c. March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan**

Within the city limit, the MARB/IPA ALUCP affects over 250 sites (parcels) previously identified by the 2014-21 Housing Element as housing opportunity sites. Approximately 75 out of the 95 acres of residential area located within the Edgemont are inconsistent with the ALUCP due to densities that exceed allowances in the ALUCP. While existing nonconforming land uses are not considered to be inconsistent with the ALUCP, any future development/expansion of uses would need to be consistent with the ALUCP. The proposed 2021 GPU land use designations have been developed to allow for compatibility with the MARB/IPA ALUCP. A new designation called Business-Flex has been planned and strategically sites to promote compatibility with airport regulations. This designation would allow light manufacturing, research and development, warehousing and distribution, and other uses consistent with applicable airport land use compatibility regulations. In addition, the Land Use Element includes a policy that requires new development to be compatible with the standards for land uses, density and intensity specified in the MARB/IPA ALUCP. The 2021 GPU proposed land uses, combined with implementation of a required consistency analysis with the MARB/IPA ALUCP at the time of future development, would ensure no conflicts would occur with this plan, and impacts would be less than significant.

## **4.11.6 Cumulative Analysis**

Development consistent with the proposed land use framework would be subject to site-specific policy consistency analysis and compliance with applicable regulations such as the municipal code. Application of regulations for each individual site-specific project would ensure that cumulative impacts related to land use consistency would be avoided. The project has incorporated policies to guide development consistent with the 2021 GPU that would ensure land use compatibility and avoid physical division of community. Individual site-specific projects would be subject to applicable 2021 GPU policies and municipal code

regulations. Therefore, the project would not contribute to a cumulative impact related to land use.

## **4.11.7 Significance of Impacts before Mitigation**

### **4.11.7.1 Topic 1: Physically Divide an Established Community**

Implementation of the project would not include new major infrastructure, such as a freeway, that could physically divide an established community. The changes envisioned with the land use plan and supporting policies are designed to increase community connections. Therefore, the project would not physically divide the community, and impacts would be less than significant.

### **4.11.7.2 Topic 2: Conflicts with Applicable Plans and Policies**

The project would implement various City planning initiatives, identifies housing sites necessary to meet RHNA goals and ensure consistency with the state housing targets, and would facilitate implementation of the CAP. Furthermore, the project would not generate growth that would exceed 2040 SCAG projections. Therefore, the project would not cause a significant environmental impact due to a conflict with any applicable plans, policies, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and impacts would be less than significant.

## **4.11.8 Mitigation**

### **4.11.8.1 Topic 1: Physically Divide an Established Community**

Impacts would be less than significant. No mitigation is required.

### **4.11.8.2 Topic 2: Conflicts with Applicable Plans and Policies**

Impacts would be less than significant. No mitigation is required.

## **4.11.9 Significance of Impacts after Mitigation**

### **4.11.9.1 Topic 1: Physically Divide an Established Community**

Impacts would be less than significant. No mitigation is required.

### **4.11.9.2 Topic 2: Conflicts with Applicable Plans and Policies**

Impacts would be less than significant. No mitigation is required.

## 4.12 Mineral Resources

This section analyzes potentially significant impacts related to mineral resources that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan. The analysis area covers the entire city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area. Within the analysis, Concept Areas refers to those areas where the GPU proposes land use changes as shown on Figure 3-1. This analysis relies on secondary sources including state and regional mineral mapping.

### 4.12.1 Existing Conditions

There are no active mineral resource extraction facilities within the Planning Area. The existing 2006 General Plan land use map, as well as the proposed GPU land use map, do not delineate any mineral resource recovery sites, or designate any land for mineral resource production. The Land Use Plan of the County of Riverside Reche Canyon/Badlands Subarea designates land along Jack Rabbit Road within the southeastern portion of the Planning Area under the Mineral Resources designation (County of Riverside 2020).

### 4.12.2 Applicable Regulatory Requirements

#### 4.12.2.1 Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act (SMARA) of 1975 established policies for the conservation, development, and reclamation of mineral lands. It also contained specific provisions for the California Geological Survey to classify the regional significance of mineral resources through the use of Mineral Resource Zones (MRZs). The objective of these zones is to identify the significance of mineral deposits and ensure that the mineral potential of land is recognized and considered by local government decision-makers before they make land use decisions that could preclude mining. The highest priority areas are those within the state that are subject to urban expansion or other irreversible land uses that would preclude mineral extraction. The following provides a description of the four different MRZs:

- MRZ-1 designates areas where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-2 designates areas underlain by mineral deposits where geologic data indicates that significant measured or indicated mineral resources are present.

- MRZ-3 designates areas that contain known mineral deposits, the significance of which cannot be evaluated from available data.
- MRZ-4 designates areas where available information is inadequate for assignment to an MRZ zone.

Figure 4.12-1 presents the distribution of each MRZ category within the Planning Area, while Table 4.12-1 presents the approximate acreage of each MRZ category within the Planning Area. The majority of land within the Planning Area is designated as MRZ-3, land for which the significance of mineral resources cannot be determined. Some land within the southwestern portion of the city is designated as MRZ-1, land where adequate geologic information indicates that no significant mineral deposits are present (1,190 acres), and a small amount of land in the southeastern portion of the Planning Area is categorized as MRZ-2, areas underlain by mineral deposits where geologic data indicates that significant measured or indicated mineral resources are present (70 acres).

Category	Acres
MRZ-1	1,190
MRZ-2	70
MRZ-3	41,657
MRZ-4	0
<b>TOTAL</b>	<b>42,917</b>

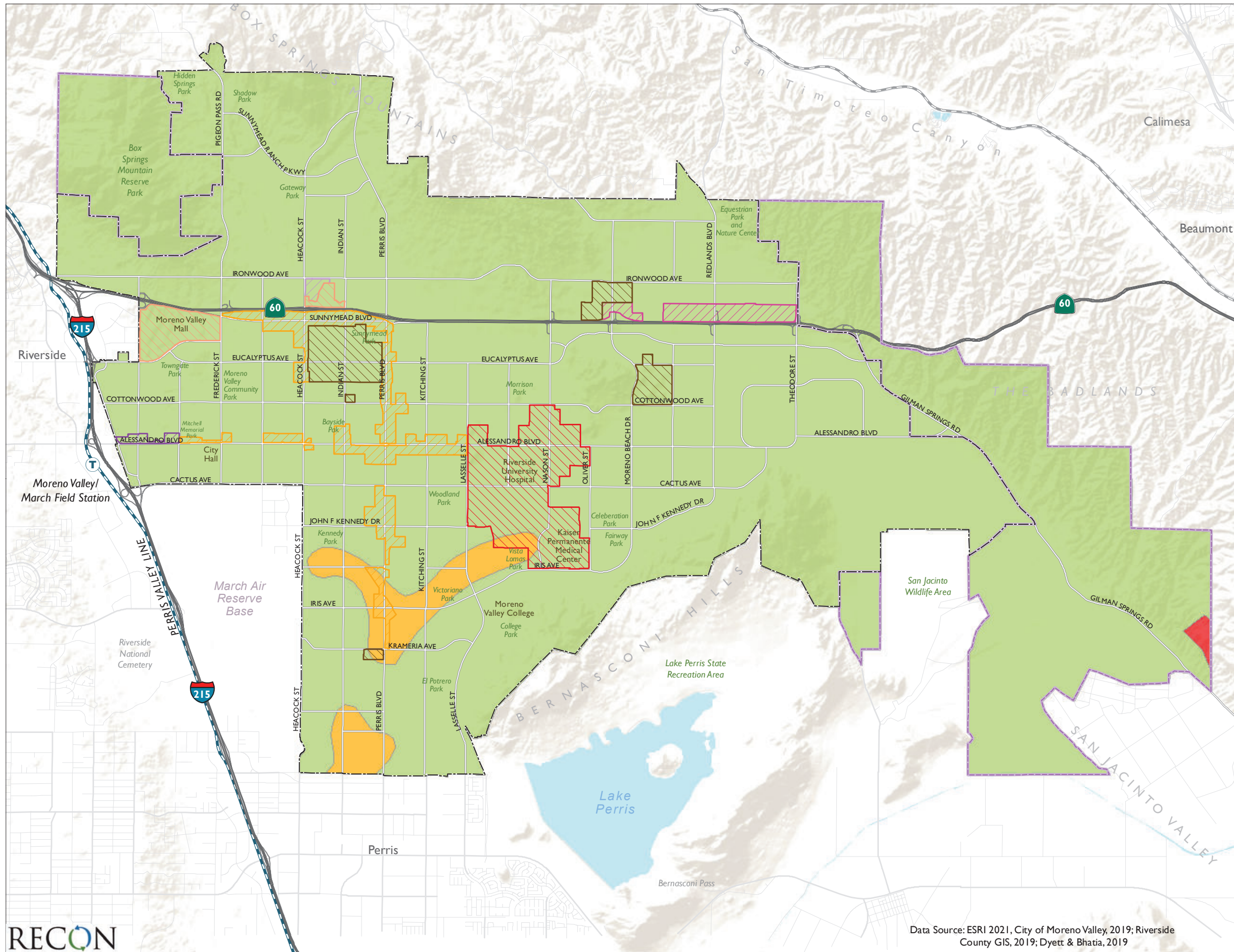
### 4.12.3 Methodologies for Determining Impacts

The impact evaluation began with a review to determine if existing mineral resource extraction activities occur within the Planning Area, and mapping the acreage of each MRZ category within the Planning Area.

### 4.12.4 Basis for Determining Significance

Thresholds used to evaluate impacts related to air quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact related to mineral resources would occur if the project would:

- 1) 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; or
- 2) 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.



- City of Moreno Valley
- Sphere of Influence
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes
- Mineral Resource Zones**
- MRZ-1
- MRZ-2
- MRZ-3



**FIGURE 4.12-1**  
Mineral Resource Zones



## 4.12.5 Impact Analysis

### 4.12.5.1 Topic 1: Mineral Resources

*Would the project 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?*

Implementation of the GPU would primarily focus new development and redevelopment within the Concept Areas. These areas are largely within or surrounded by existing urbanization, which would make them infeasible for mining. As described in Section 4.12.2.1 above, the majority of land within the Planning Area is designated as MRZ-3, land for which the significance of mineral resources cannot be determined, or MRZ-1, land for which adequate geologic information indicates that no significant mineral deposits are present. Neither of these MRZ categories are considered significant mineral resources. The small amount of land designated as MRZ-2, areas underlain by mineral deposits where geologic data indicates that significant measured or indicated mineral resources are present, is not located within any of the proposed Concept Areas. Furthermore, this area is not currently used for mineral resource extraction. Therefore, the project would not result in the loss of availability of regionally valuable mineral resources, and impacts would be less than significant.

### 4.12.5.2 Topic 2: Mineral Resource Recovery Site

*Would the project 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?*

As described in Section 4.12.1 above, there are no active mineral resource extraction facilities within the Planning Area. The existing 2006 General Plan land use map, as well as the proposed GPU land use map do not delineate any mineral resource recovery sites, or designate any land for mineral resource production. Therefore, implementation of the project would not result in the loss of a designated mineral recovery site and no impact would occur.

## 4.12.6 Cumulative Analysis

The majority of land within the Planning Area is designated as MRZ-3, land for which the significance of mineral resources cannot be determined, or MRZ-1, land for which adequate geologic information indicates that no significant mineral deposits are present. Neither of these MRZ categories are considered significant mineral resources. The small amount of land designated as MRZ-2, areas underlain by mineral deposits where geologic data indicates that significant measured or indicated mineral resources are present, is not located within any of the proposed Concept Areas. The Planning Area does not possess any mineral resource recovery sites. Therefore, the project would not contribute to a cumulative impact related to mineral resources.

## **4.12.7 Significance of Impacts before Mitigation**

### **4.12.8.1 Topic 1: Mineral Resources**

Impacts would be less than significant. No mitigation is required.

### **4.12.8.2 Topic 2: Mineral Resource Recovery Site**

No impact would occur. No mitigation is required.

## **4.12.8 Mitigation**

### **4.12.8.1 Topic 1: Mineral Resources**

Impacts would be less than significant. No mitigation is required.

### **4.12.8.2 Topic 2: Mineral Resource Recovery Site**

No impact would occur. No mitigation is required.

## **4.12.9 Significance of Impacts after Mitigation**

### **4.12.9.1 Topic 1: Mineral Resources**

Impacts would be less than significant. No mitigation is required.

### **4.12.9.2 Topic 2: Mineral Resource Recovery Site**

No impact would occur. No mitigation is required.

## 4.13 Noise

This section analyzes the noise impacts that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area. The analysis in this section is based on the existing and proposed land use patterns, existing and buildout traffic volumes on Planning Area freeways and roadways, and vehicle miles traveled (VMT) documented in the Moreno Valley General Plan Circulation Element Vehicle Miles Traveled Impact Assessment Memorandum (Fehr & Peers 2021). Noise measurement and modeling data is provided in Appendix D.

### 4.13.1 Existing Conditions

The Planning Area is subject to typical urban noises such as noise generated by traffic, heavy machinery, and day-to-day outdoor activities. The Planning Area also has several transportation-related noise sources, including airport noise, railroad operations, major arterials, Interstate 215 (I-215), and State Route 60 (SR-60). Noise sources that are not directly related to transportation include noise from commercial and industrial centers, construction, and property maintenance activities.

#### 4.13.1.1 Fundamentals of Noise and Vibration

##### a. Fundamentals of Noise

Sound levels are described in units called the decibel (dB). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. Thus, a doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; a halving of the energy would result in a 3 dB decrease.

Additionally, in technical terms, sound levels are described as either a “sound power level” or a “sound pressure level,” which while often confused, are two distinct characteristics of sound. Both share the same unit of measure, the dB. However, sound power, expressed as  $L_{pw}$ , is the energy converted into sound by the source. The  $L_{pw}$  is used to estimate how far a noise will travel and to predict the sound levels at various distances from the source. As sound energy travels through the air, it creates a sound wave that exerts pressure on receivers such as an ear drum or microphone and is the sound pressure level. Noise measurement instruments only measure sound pressure, and noise level limits used in standards are generally sound pressure levels.

The human ear is not equally sensitive to all frequencies within the sound spectrum. To accommodate this phenomenon, the A-scale, which approximates the frequency response of the average young ear when listening to most ordinary everyday sounds, was devised. When people make relative judgments of the loudness or annoyance of a sound, their judgments correlate well with the A-scale sound levels of those sounds. Therefore, the “A-weighted” noise scale is used for measurements and standards involving the human perception of noise. Noise levels using A-weighted measurements are designated with the notation dB(A).

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important. Additionally, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors has been developed. The noise descriptors used for this study are the one-hour equivalent noise level ( $L_{eq}$ ) and the community noise equivalent level (CNEL). The CNEL is a 24-hour equivalent sound level. The CNEL calculation applies a 5 dB(A) penalty to noise occurring during evening hours, between 7:00 p.m. and 10:00 p.m., and a 10 dB(A) penalty is added to noise occurring during the night, between 10:00 p.m. and 7:00 a.m. These increases for certain times are intended to account for the added sensitivity of humans to noise during the evening and night.

Sound from a small, localized source (approximating a “point” source) radiates uniformly outward as it travels away from the source in a spherical pattern, known as geometric spreading. The sound level decreases or drops off at a rate of 6 dB(A) for each doubling of the distance.

Traffic noise is not a single, stationary point source of sound. The movement of vehicles makes the source of the sound appear to emanate from a line (line source) rather than a point when viewed over some time interval. The drop-off rate for a line source is 3 dB(A) for each doubling of distance.

The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site (such as parking lots or smooth bodies of water) receives no additional ground attenuation, and the changes in noise levels with distance (drop-off rate) are simply the geometric spreading of the source. A soft site (such as soft dirt, grass, or scattered bushes and trees) receives an additional ground attenuation value of 1.5 dB(A) per doubling of distance. Thus, a point source over a soft site would attenuate at 7.5 dB(A) per doubling of distance.

Human perception of noise has no simple correlation with acoustical energy. A change in noise levels is generally perceived as follows: 3 dB(A) barely perceptible, 5 dB(A) readily perceptible, and 10 dB(A) perceived as a doubling or halving of noise (California Department of Transportation [Caltrans] 2013).

## **b. Fundamentals of Vibration**

Vibration consists of energy waves transmitted through solid material (Federal Transit Administration [FTA] 2018). Groundborne vibration propagates from the source through the ground to adjacent buildings by surface waves. Vibration may be composed of a single pulse,

a series of pulses, or a continuous oscillatory motion. The frequency of a vibrating object describes how rapidly it is oscillating, measured in hertz (Hz). The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than 1 Hz to a high of about 200 Hz (FTA 2018).

Groundborne vibration is measured by its peak particle velocity (PPV), which is normally described in inches per second (in/sec). PPV is appropriate for determining potential structure damage but does not evaluate human response to vibration. The ground motion caused by vibration may also be described in decibel notation (vibration decibels), referenced as VdB, which serves to compress the range of numbers required to describe vibration relative to human response. The general human response to different levels of groundborne vibration velocity levels is described in Table 4.13-1.

<b>Table 4.13-1</b>	
<b>Human Response to Different Levels of Groundborne Vibration</b>	
Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people.
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day.
SOURCE: FTA 2018. VdB = vibration decibel	

Vibration energy spreads out as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. The way in which vibration is transmitted through the earth is called propagation. As vibration waves propagate from a source, the energy is spread over an ever-increasing area such that the energy level striking a given point is reduced with the distance from the energy source. This geometric spreading loss is inversely proportional to the square of the distance. Wave energy is also reduced with distance as a result of material damping in the form of internal friction, soil layering, and void spaces. The amount of attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

Groundborne vibration can be a concern for nearby residents along a transit system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard. Groundborne vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of groundborne vibration are trains; buses on rough roads; and construction activities such as blasting, pile-driving, and operating heavy earth-moving equipment.

### 4.13.1.2 Ambient Noise Measurements

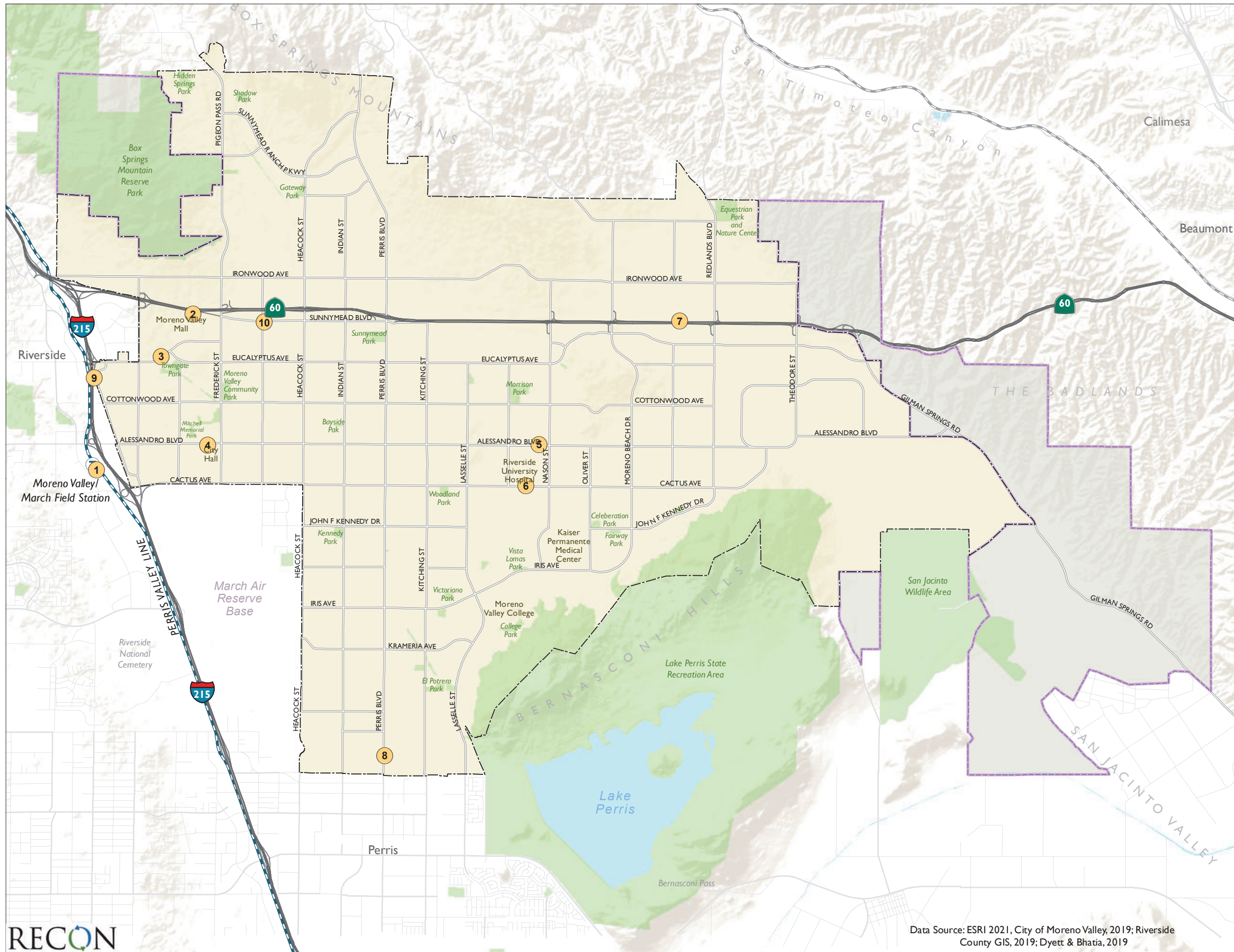
As part of this assessment, ambient noise levels were measured in the Planning Area to provide a characterization of the variability of noise and to assist in determining constraints and opportunities for future development. Ten 15-minute daytime noise level measurements were conducted throughout the study area. Noise measurements were taken with two Larson-Davis LxT Type 1 Integrating Sound Level Meters, serial numbers 3828 and 3829. The following parameters were used:

Filter: A-weighted  
 Response: Slow  
 Time History Period: 5 seconds  
 Height of Instrument: 5 feet above ground level

Measurement locations are shown in Figure 4.13-1. A summary of the measurements is provided in Table 4.13-2, and traffic counts taken during measurements are summarized in Table 4.13-3. Based on the measurement data, daytime noise levels in the Planning Area are typical of an urban environment. Each measurement location and noise source observed during the measurements is discussed below.

Measurement	Location	Date	Time	L <sub>eq</sub>
1	Moreno Valley/March Field Metro Link Station	12/18/19	10:46 a.m. – 11:01 a.m.	60.1
2	Moreno Valley Mall	12/18/19	11:19 a.m. – 11:34 a.m.	65.5
3	Eucalyptus Ave./Towngate Center	12/18/19	11:42 a.m. – 11:57 a.m.	67.7
4	Civic Center/Alessandro Blvd.	12/18/19	12:13 p.m. – 12:28 p.m.	64.1
5	Nason/Alessandro Blvd.	12/18/19	1:15 p.m. – 1:30 p.m.	65.9
6	Riverside County Regional Medical Center/Cactus Ave.	12/18/19	1:37 p.m. – 1:52 p.m.	66.6
7	SR-60	12/19/19	10:46 a.m. – 11:01 a.m.	74.8
8	Warehouse Area/Perris Blvd.	12/19/19	12:07 p.m. – 12:22 p.m.	67.4
9	I-215	12/19/19	1:09 p.m. – 1:24 p.m.	71.3
10	Sunnymead Blvd.	12/19/19	1:55 p.m. – 2:10 p.m.	67.2

L<sub>eq</sub> = one-hour equivalent noise level.



- City of Moreno Valley
- Sphere of Influence
- Noise Measurement Locations



**FIGURE 4.13-1**  
Noise Measurement Locations

**Table 4.13-3  
15-Minute Traffic Counts**

Measurement	Roadway	Direction <sup>1</sup>	Autos	Medium Trucks	Heavy Trucks	Buses	Motorcycles
2	Town Circle	EB	52	1	0	0	0
		WB	55	0	0	4	1
3	Eucalyptus Ave.	EB	135	0	0	1	0
		WB	117	2	1	1	1
4	Alessandro Blvd.	EB	199	0	5	1	0
		WB	249	4	4	1	1
5	Alessandro Blvd.	EB	96	2	0	1	1
		WB	77	3	0	0	0
6	Cactus Ave.	EB	96	0	0	2	1
		WB	109	2	1	1	0
8	Perris Blvd.	NB	168	8	19	2	0
		SB	136	2	13	2	1
9	Old 215 Frontage Rd.	NB	156	0	2	0	0
		SB	59	1	4	0	0
10	Sunnymead Blvd.	EB	192	2	0	1	0
		WB	162	6	0	1	0

<sup>1</sup>EB = eastbound; WB = westbound; NB = northbound; SB = southbound  
NOTE: Traffic counts were not conducted during Measurements 1 or 7 because freeway traffic volumes could not be manually counted.

Measurement 1 was taken at the Moreno Valley/March Field Metro Link Station located west of I-215, east of Meridian Parkway, and south of Alessandro Boulevard. The measurement was located at the fence overlooking the Metrolink tracks, approximately 140 feet from the tracks and 715 feet from I-215. The main source of noise at this measurement location was vehicle traffic on I-215. Other sources of noise included aircraft taking off from March Air Reserve Base (MARB) and distance construction equipment. The average measured noise level was 60.1 dB(A)  $L_{eq}$ .

Measurement 2 was located at the northeastern edge of the Moreno Valley Mall, approximately 25 feet from Town Circle and 165 feet south of SR-60. The main source of noise at this location was vehicle traffic on SR-60 and Town Circle. Other noise sources included parking lot activities and buses. Traffic volumes on Town Circle were counted during the 15-minute measurement period. The average measured noise level was 65.5 dB(A)  $L_{eq}$ .

Measurement 3 was located near the intersection of Eucalyptus Avenue/Towngate Boulevard and Memorial Way, approximately 50 feet north of Eucalyptus Avenue. The main source of noise at this location was vehicle traffic on Eucalyptus Avenue. Traffic volumes on Eucalyptus Avenue were counted during the 15-minute measurement period. The average measured noise level was 67.7 dB(A)  $L_{eq}$ .

Measurement 4 was taken near Moreno Valley City Hall, west of the intersection of Alessandro Boulevard and Frederick Street, approximately 40 feet south of Alessandro Boulevard. The main source of noise at this location was vehicle traffic on Alessandro Boulevard. Other sources of noise included airplanes. Traffic volumes on Alessandro



Boulevard were counted during the 15-minute measurement period. The average measured noise level was 64.1 dB(A)  $L_{eq}$ .

Measurement 5 was taken near the intersection of Alessandro Boulevard and Nason Street, approximately 50 feet north of Alessandro Boulevard. The main source of noise at this location was vehicle traffic on Alessandro Boulevard. Other sources of noise included vehicles accessing the driveway south of the measurement location and airplanes. Traffic volumes on Alessandro Boulevard were counted during the 15-minute measurement period. The average measured noise level was 65.9 dB(A)  $L_{eq}$ .

Measurement 6 was taken adjacent to the Riverside County Regional Medical Center, approximately 30 feet north of Cactus Avenue. The main source of noise at this location was vehicle traffic on Cactus Avenue. Other sources included noise parking lot activities and an ambulance siren. Traffic volumes on Cactus Avenue were counted during the 15-minute measurement period. The average measured noise level was 66.6 dB(A)  $L_{eq}$ .

Measurement 7 was located approximately 85 feet north of SR-60. The main source of noise at this location was vehicle traffic on SR-60. The average measured noise level was 74.8 dB(A)  $L_{eq}$ .

Measurement 8 was located within the warehousing area in the southern Planning Area, approximately 50 feet east of Perris Boulevard. The main source of noise was vehicle traffic on Perris Boulevard. Other sources of noise included aircraft from MARB. Traffic volumes on Perris Boulevard were counted during the 15-minute measurement period. The average measured noise level was 67.4 dB(A)  $L_{eq}$ .

Measurement 9 was taken at the western boundary of the Planning Area, approximately 30 feet west of Old 215 Frontage Road and 100 feet east of I-215. The main source of noise was vehicle traffic on I-215. Other sources of noise included vehicle traffic on Old 215 Frontage Road and aircraft from MARB. Traffic volumes on Old 215 Frontage Road were counted during the 15-minute measurement period. The average measured noise level was 71.3 dB(A)  $L_{eq}$ .

Measurement 10 was taken approximately 50 feet south of Sunnymead Boulevard and 115 feet east of Graham Street. The main source of noise at this location was vehicle traffic on Sunnymead Boulevard. Other sources of noise included vehicle traffic on Graham Street and airplanes. Traffic volumes on Sunnymead Boulevard were counted during the 15-minute measurement period. The average measured noise level was 67.2 dB(A)  $L_{eq}$ .

### 4.13.1.3 Existing Traffic Noise

Major roads generating the greatest noise level in the Planning Area are I-215, SR-60, Alessandro Boulevard, and Perris Boulevard. Additionally, numerous other roads within the Planning Area are also major sources of noise. The noise contour distances represent the predicted noise level for each roadway without the attenuating effects of noise barriers, structures, topography, or dense vegetation. As intervening structures, topography, and dense vegetation would affect noise exposure at a particular location, the noise contours

should not be considered site-specific but are rather guides to determine when detailed acoustic analysis should be undertaken.

Figure 4.13-2 shows the existing vehicle traffic noise contours for the Planning Area. As shown, existing noise levels at areas located closest to the roadways exceed 60 CNEL. The local freeways are the dominant noise sources in the Planning Area. Noise contours from the freeways in many cases overlap with and encompass the noise contours from local roadways.

#### **4.13.1.4 March Air Reserve Base Noise Contours**

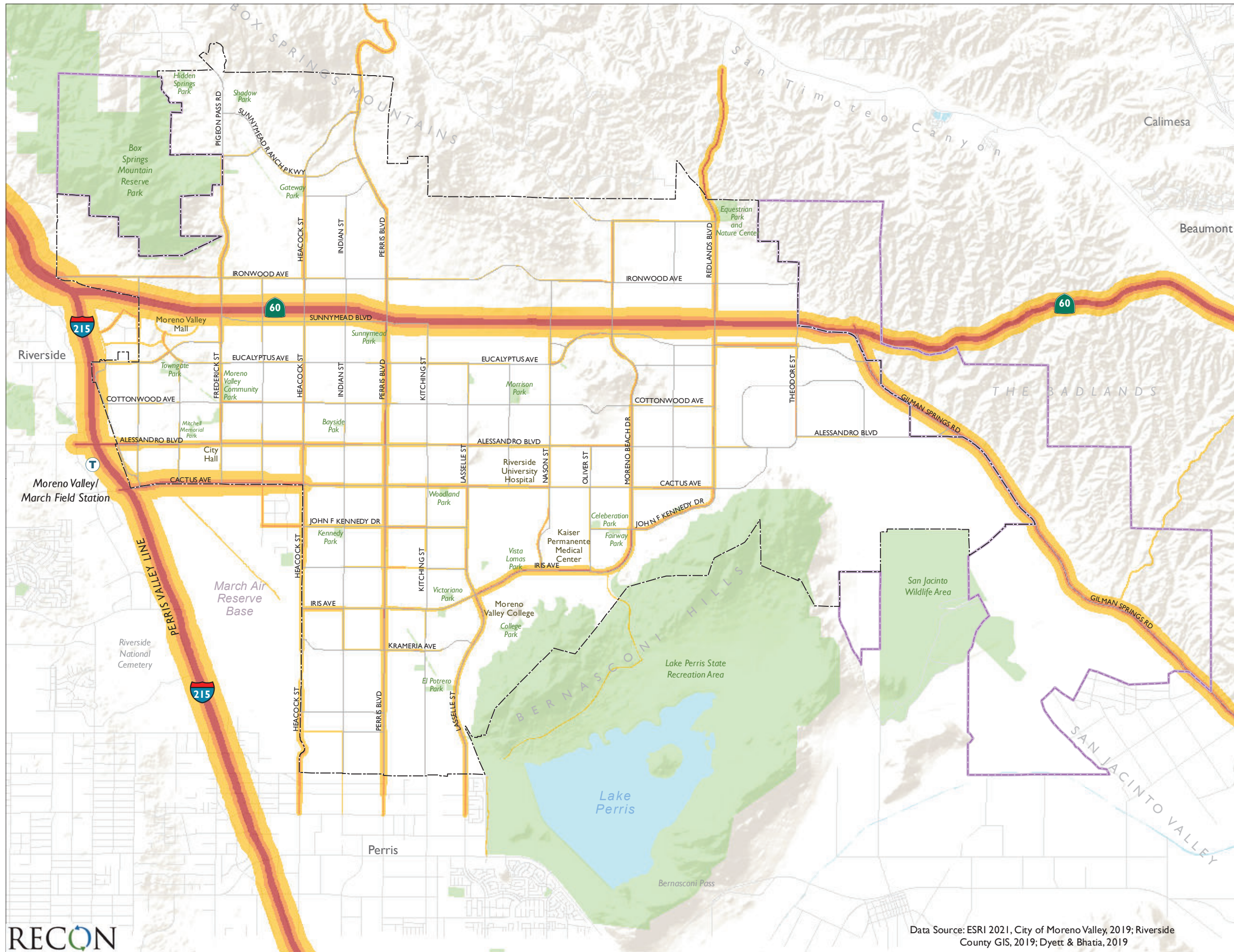
The MARB is a joint-use civilian and military facility located immediately adjacent to the southwestern boundary of the Planning Area. MARB is bordered by the city to the east/northeast, city of Riverside to the northwest, the city of Perris to the south, and unincorporated Riverside County to the west. The Airport Influence Area (AIA) extends up to 9 miles north, west, and east of the main runway and 14 miles to the south, and covers land within unincorporated Riverside County and the cities of Menifee, Moreno Valley, Perris, and Riverside. Land uses in the immediate vicinity of MARB generally consist of public/institutional uses to the west, office/business park and industrial uses to the northwest, office and commercial uses to the north, open space and residential uses to the northeast, open space and industrial uses to the southeast, and open space, agricultural uses, and residential to the south. The MARB noise contours are shown in Figure 4.13-3 (Riverside County Airport Land Use Commission [Riverside County ALUC] 2014).

#### **4.13.1.5 Railroad Noise**

Train noise, however intermittent, is a major source of noise due to its magnitude. The San Jacinto Branch Line closely follows the I-215 corridor, bordering the western edge of the city. Both the Metrolink commuter rail and freight trains travel along the corridor. The Metrolink commuter rail 91/Perris Valley Line stops at the Moreno Valley/March Air Field Station, located between Eucalyptus Avenue and Cactus Avenue on the western border of the city. Commuter trains stop several times a day in the morning and evening, and freight trains pass through about twice a day.

#### **4.13.1.6 Industrial Noise**

Industrial uses, including manufacturing, warehousing, and distribution-related uses, are another source of noise that can have a varying degree of impact on adjacent uses. Mechanical equipment, generators, and vehicles associated with these uses all contribute to noise levels at industrial sites. Existing industrial uses are largely concentrated in the southwestern portion of the city, adjacent to MARB and I-215. While industrial uses are generally concentrated at the periphery of the city, the potential for noise conflicts exists where these uses would abut residential areas.

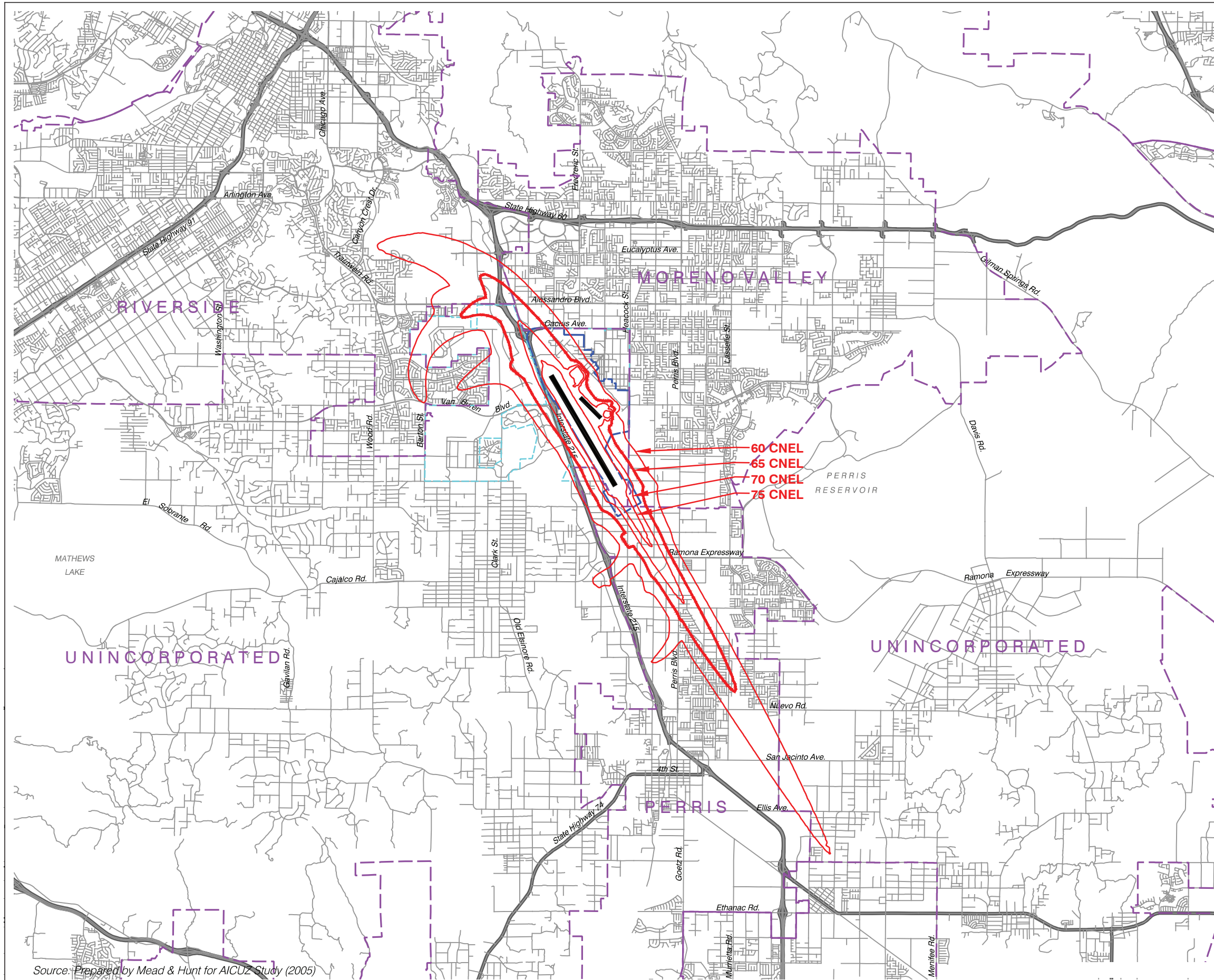


City of Moreno Valley  
 Sphere of Influence  
**Existing Noise Contours**  
 65 to 70 CNEL  
 70 to 75 CNEL  
 > 75 CNEL



**FIGURE 4.13-2**  
Existing Vehicle Traffic  
Noise Contours

Data Source: ESRI 2021, City of Moreno Valley, 2019; Riverside County GIS, 2019; Dyett & Bhatia, 2019



**LEGEND**

**Noise Contours**

- 60 dB CNEL
  - 65 dB CNEL
  - 70 dB CNEL
  - 75 dB CNEL
- } Projected Activity Level  
(75,104 operations)

**Boundary Lines**

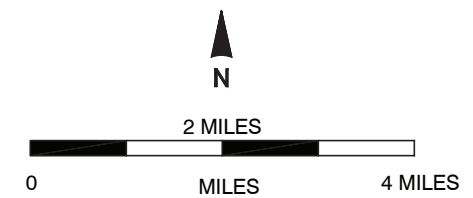
- March Air Reserve Base / Inland Port Airport
- March Joint Powers Authority Property Line
- City Limits

Projected Activity Level	
Annual Operations	75,104
Average Annual Day	206

**Note:**

Contours represent composite of noise contours from four sources:

- Forecasts and noise contours from Air Installation Compatible Use Study for March Air Reserve Base (August 2005).
- Environmental Assessment for Proposed Military Construction and Total Force Integration at March Air Reserve Base (Air Force Reserve Command, June 2010); Environmental Impact Report for March Inland Port General Aviation Facilities Development (March Joint Powers Authority, August 2012).
- F-15 Aircraft Conversion Environmental Impact Statement 144th Fighter Wing California Air National Guard Fresno-Yosemite International Airport (National Guard Bureau, March 2013).



Source: Prepared by Mead & Hunt for AICUZ Study (2005)

**FIGURE 4-13.3**  
March Air Reserve Base Noise Contours

## 4.13.2 Applicable Regulatory Requirements

### 4.13.2.1 Federal

#### a. Construction Noise

The FTA provides financial and technical assistance to local public transit systems, including buses, subways, light rail, commuter rail, trolleys and ferries. FTA also oversees safety measures. The FTA's Transit Noise and Vibration Impact Assessment manual indicates that 80 dB(A)  $L_{eq}$  is reasonable criteria for assessing construction noise levels at residential uses (FTA 2018).

#### b. Vibration

The FTA provides criteria for acceptable levels of groundborne vibration for various types of buildings. Structures amplify groundborne vibration; wood-frame buildings, such as typical residential structures, are more affected by ground vibration than heavier buildings. The level at which groundborne vibration is strong enough to cause architectural damage has not been determined conclusively, but the standards recommended by the FTA are shown in Table 4.13-4.

Building/Structural Category	PPV (in/sec)	Approximate VdB
I. Reinforced-concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90
SOURCE: FTA 2018. PPV = peak particle velocity in/sec = inch per second VdB = vibration decibel		

The FTA also provides guidance for assessing vibration impacts from railroad operations. The criteria for determining the significance of impacts are presented in Table 4.13-5.

<b>Table 4.13-5 Guidelines for Determining the Significance of Groundborne Vibration and Noise Impacts</b>						
Land Use Category	Groundborne Vibration Impact Levels (VdB re 1 micro-inch per second)			Groundborne Noise Impact Levels (dB re 20 micro Pascals)		
	Frequent Events	Occasional Events	Infrequent Events	Frequent Events	Occasional Events	Infrequent Events
Category 1: Buildings where low ambient vibration is essential for interior operations (research & manufacturing facilities with special vibration constraints) <sup>6</sup>	65 VdB	65 VdB	65 VdB	N/A	N/A	N/A
Category 2: Residences and buildings where people normally sleep (hotels, hospitals, residences, & other sleeping facilities) <sup>6</sup>	72 VdB	75 VdB	80 VdB	35 dB(A)	38 dB(A)	43 dB(A)
Category 3: Institutional land uses with primarily daytime use (schools, churches, libraries, other institutions, & quiet offices) <sup>6</sup>	75 VdB	78 VdB	83 VdB	40 dB(A)	43 dB(A)	48 dB(A)
SOURCE: FTA 2018. VdB = vibration decibel; re = relative; N/A = not applicable “Frequent Events” is defined as more than 70 vibration events per day. Most rapid transit projects fall into this category. “Occasional Events” is defined as 30 to 70 vibration events per day. Most commuter trunk links fall into this category. “Infrequent Events” is defined as fewer than 70 vibration events per day. This category includes most commuter rail systems.						

For Category 1 uses such as vibration sensitive equipment, the screening distance from the right-of-way is 600 feet. For Category 2 land uses such as residences and buildings where people would normally sleep, the screening distance is 200 feet. The screening distance for Category 3 land uses such as institutional land uses with primarily daytime uses, is 120 feet.

### 4.13.2.2 State

#### a. General Plan Guidelines

The State of California, through its General Plan Guidelines, discusses how ambient noise should influence land use and development decisions and includes a table of normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable uses at different noise levels, expressed in CNEL (Governor’s Office of Planning and Research 2017). This table provides a tool to gauge the compatibility of land uses relative to existing and future noise levels. It provides land use compatibility guidelines that local jurisdictions can use as a guide for establishing its own General Plan noise compatibility levels that reflect the noise-control goals of the community, the particular community’s sensitivity to noise, and the community’s assessment of the relative importance of noise pollution. The compatibility guidelines identify normally acceptable, conditionally acceptable, and clearly unacceptable noise levels for various land uses. A conditionally acceptable designation implies new construction or development should be undertaken only after detailed analysis of the noise reduction requirements for each land use, and needed noise insulation features are

incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements.

## **b. California Code of Regulations**

Interior noise levels for residential habitable rooms are regulated by Title 24 of the California Code of Regulations California Noise Insulation Standards. Title 24, Chapter 12, Section 1206.4, of the 2019 California Building Code requires that interior noise levels attributable to exterior sources not exceed 45 CNEL in any habitable room (California Code of Regulations 2019). A habitable room is a room used for living, sleeping, eating, or cooking. Bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable rooms for this regulation (Title 24 California Code of Regulations, Chapter 12, Section 1206.4).

For non-residential structures, Title 24, Chapter 12, Section 1207.5 refers to 2019 California Green Building Standards, Chapter 5 – Nonresidential Mandatory Measures, Division 5.5 – Environmental Quality, Section 5.507 – Environmental Comfort, Subsection 5.507.4 – Acoustical Control. Pursuant to these standards, all non-residential building construction shall employ building assemblies and components that achieve a composite sound transmission class rating of at least 50 or shall otherwise demonstrate that exterior noise shall not result in interior noise environment where noise levels exceed 50 dB(A)  $L_{eq}$  in occupied areas during any hour of operation.

### **4.13.2.3 Riverside County Airport Land Use Commission**

As described in Section 4.13.1.4 above, MARB is located immediately adjacent to the southwestern boundary of the Planning Area. The Riverside County ALUC prepares airport land use compatibility plans (ALUCP) in order to promote compatibility between airports and the land uses surrounding them. ALUCPs set compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances. The Riverside County ALUCP was adopted in 2004, and provides general guidelines applicable to all airports under Riverside County ALUC jurisdiction (Riverside County ALUC 2004). The MARB/Inland Port Airport (IPA) ALUCP was adopted in 2014 and provides guidelines specific to MARB (Riverside County ALUC 2014). The MARB/IPA ALUCP provides the following noise guidelines for MARB:

- a. Countywide Policy 4.1.5: The CNEL considered normally acceptable for new residential land uses in the vicinity of MARB/IPA is 65 dB.
- b. Countywide Policy 4.1.6: Single-event noise levels from aircraft operations can be particularly intrusive at night. Compared to other airports in the county, current and projected nighttime activity by large aircraft at March ARB/IPA warrants a greater degree of sound attenuation for the interiors of buildings housing certain uses as cited below.

1. The maximum, aircraft-related, interior noise level that shall be considered acceptable shall be CNEL 40 dB for all new residences, schools, libraries, museums, hotels and motels, hospitals and nursing homes, places of worship, and other noise-sensitive uses. For office uses, the interior standard shall be CNEL 45 dB, the same as the countywide criterion.
2. To ensure compliance with these criteria, an acoustical study shall be required to be completed for any development proposed to be situated where the aviation-related noise exposure is more than 20 dB above the interior standard (e.g., within the CNEL 60 dB contour where the interior standard is CNEL 40 dB). Standard building construction is presumed to provide adequate sound attenuation where the difference between the exterior noise exposure and the interior standard is 20 dB or less.

#### 4.13.2.4 City of Moreno Valley

##### a. Municipal Code

##### *Operational Noise*

The City regulates noise through the Municipal Code under Title 11 Peace, Morals and Safety, Chapter 11.80, Noise Regulation. Tables 4.13-6 and 4.13-7 summarize the maximum continuous and maximum impulsive noise level limits specified in Section 11.80.030(B)(1) of the Municipal Code.

<b>Table 4.13-6 Maximum Continuous Sound Levels</b>	
Duration per Day Continuous Hours	Sound Level Limit [dB(A) $L_{eq}$ ]
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105
0.5	110
0.25	115
dB(A) = A-weighted decibels. $L_{eq}$ = one-hour equivalent noise level.	



Number of Repetitions per 24-Hour Period	Sound Level Limit [dB(A) $L_{eq}$ ]
1	145
10	135
100	125

dB(A) = A-weighted decibels.  
 $L_{eq}$  = one-hour equivalent noise level.

Section 11.80.030(C) provides noise level limits for non-impulsive noise. The section states “No person shall maintain, create, operate or cause to be operated on private property any source of sound in such a manner as to create any non-impulsive sound which exceeds the limits set forth for the source land use category in Table 11.80.030-2 when measured at a distance of two hundred (200) feet or more from the real property line of the source of the sound, if the sound occurs on privately owned property, or from the source of the sound, if the sound occurs on public right-of-way, public space or other publicly owned property.” The sound level limits provided in Table 11.80.030-2 of the Municipal Code are summarized in Table 4.13-8.

Residential		Commercial	
Daytime	Nighttime	Daytime	Nighttime
60	55	65	60

dB(A) = A-weighted decibels.  
 $L_{eq}$  = one-hour equivalent noise level.

### ***Construction Noise***

The Municipal Code limits construction activities in two parts of the code: Sections 8.14.040(E) and 11.80.030(D)(7). Section 8.14.040(E) states that construction within the city shall only occur from 7:00 a.m. to 7:00 p.m. from Monday through Friday excluding holidays and from 8:00 a.m. to 4:00 p.m. on Saturdays. Section 11.80.030(D)(7) states that no person shall operate or cause the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between the hours of 8:00 p.m. and 7:00 a.m. such that the sound creates a noise disturbance. For power tools, specifically, 11.80.030(D)(9) states that no person shall operate or permit the operation of any mechanically, electrically or gasoline motor-driven tool during nighttime hours that causes a noise disturbance across a residential property line. A noise disturbance is defined as any sound that disturbs a reasonable person of normal sensitivities, exceeds the sound level limits set forth in the Noise Ordinance, or is plainly audible (as measured at a distance of 200 feet from the property line of the source of the sound if the sound occurs on privately owned property, or public right-of-way, public space, or other publicly owned property).

## ***Vibration***

The Municipal Code does not establish quantified limits for vibration levels. Section 9.10.170 states that “No vibration shall be permitted which can be felt at or beyond the property line.”

### **4.13.3 Methodologies for Determining Impacts**

#### **4.13.3.1 Vehicle Traffic Noise**

Traffic noise occurs adjacent to every roadway and is directly related to the traffic volume, speed, and mix of vehicles. Existing and future traffic volumes, speeds, and truck percentages for each roadway segment in the Planning Area, as well as the day/evening/nighttime traffic distribution, were obtained from the traffic engineer. The Federal Highway Administration (FHWA) Traffic Noise Model algorithms were used to calculate distances to noise contours for each roadway. The FHWA model takes into account traffic mix, speed, and volume; roadway gradient; relative distances between sources, barriers, and sensitive receptors; and shielding provided by intervening terrain or structures.

The analysis of the noise environment considered that the topography was flat with no intervening terrain between sensitive land uses and roadways. Because modeled predicted noise levels do not account for obstructions, they are higher than those which would actually occur. In actuality, buildings and other obstructions along the roadways would shield distant receivers from the traffic noise. Existing and future vehicle traffic noise calculations are provided in Appendix D.

#### **4.13.3.2 Railroad Noise**

The Metrolink commuter rail 91/Perris Valley Line operates adjacent to the Planning Area. Based on published schedules, there are four inbound Metrolink trains that stop at the Moreno Valley/March Field station between 4 a.m. and 7 a.m. Monday through Friday, and four outbound trains between 5 p.m. and 8 p.m. Monday through Friday. Fewer trains operate on Saturday and Sunday. Additionally, freight trains pass through about twice a day. Noise associated with railroad operations was modeled using the FTA recommended Chicago Rail Efficiency and Transportation Efficiency (CREATE) railroad noise model (Harris Miller & Hanson, Inc. 2006). All trains were modeled at 60 miles per hour (mph). For a worst-case analysis, it was assumed that the freight trains would operate during the nighttime hours. Noise contour distances were calculated assuming flat-site conditions and no intervening buildings that would provide noise attenuation.

#### **4.13.3.3 Stationary Noise**

Stationary sources of noise include activities associated with a given land use. The Planning Area includes multiple land uses, including residential, commercial, industrial, and mixed-use land uses. Various land uses contain on-site stationary noise sources, including rooftop heating, ventilation, and air conditioning (HVAC) equipment; mechanical equipment; emergency electrical generators; parking lot activities; loading dock operations; and

recreation activities. Stationary noise is considered a “point source” and attenuates over distance at a rate of 6 dB(A) for each doubling of distance. The exact location and nature of future stationary noise sources is not known at this time, and therefore cannot be calculated in this analysis. Impacts were assessed in this analysis by identifying potential types of stationary sources and locations of mixed-use land use interfaces and identifying applicable regulations and mitigation framework for addressing impacts.

#### 4.13.3.4 Construction Noise

Construction noise has the potential to result in temporary ambient noise increase due to construction activities. Construction noise is generated by diesel-powered construction equipment used for site preparation and grading, removal of existing structures and pavement, loading, unloading, and placing materials and paving. Diesel engine-driven trucks also bring materials to the site and remove the spoils from excavation. Table 4.13-9 summarizes typical construction equipment noise levels.

Construction equipment would generate maximum noise levels between 70 and 95 dB(A)  $L_{max}$  at 50 feet from the source when in operation. During excavation, grading, and paving operations, equipment moves to different locations and goes through varying load cycles, and there are breaks for the operators and for non-equipment tasks, such as measurement. Average construction noise levels were calculated for the simultaneous operation of three common pieces of construction equipment: backhoe, excavator, and loader. The usage factors were applied to the maximum noise level at 50 feet for each piece of equipment, and then noise levels were added logarithmically. Hourly average noise levels would be approximately 83 dB(A)  $L_{eq}$  at 50 feet from the center of construction activity when assessing three pieces of common construction equipment working simultaneously. Noise levels would vary depending on the nature of the construction including the duration of specific activities, nature of the equipment involved, location of the particular receiver, and nature of intervening barriers.

Equipment	Noise Level at 50 Feet [dB(A) $L_{eq}$ ]	Typical Duty Cycle
Auger Drill Rig	85	20%
Backhoe	80	40%
Blasting	94	1%
Chain Saw	85	20%
Clam Shovel	93	20%
Compactor (ground)	80	20%
Compressor (air)	80	40%
Concrete Mixer Truck	85	40%
Concrete Pump	82	20%
Concrete Saw	90	20%
Crane (mobile or stationary)	85	20%
Dozer	85	40%
Dump Truck	84	40%
Excavator	85	40%
Front End Loader	80	40%
Generator (25 kilovolt ampts or less)	70	50%
Generator (more than 25 kilovolt amps)	82	50%
Grader	85	40%

Equipment	Noise Level at 50 Feet [dB(A) $L_{eq}$ ]	Typical Duty Cycle
Hydra Break Ram	90	10%
Impact Pile Driver (diesel or drop)	95	20%
In situ Soil Sampling Rig	84	20%
Jackhammer	85	20%
Mounted Impact Hammer (hoe ram)	90	20%
Paver	85	50%
Pneumatic Tools	85	50%
Pumps	77	50%
Rock Drill	85	20%
Roller	74	40%
Scraper	85	40%
Tractor	84	40%
Vacuum Excavator (vac-truck)	85	40%
Vibratory Concrete Mixer	80	20%
Vibratory Pile Driver	95	20%
SOURCE: FHWA 2006. dB(A) = A-weighted decibels $L_{eq}$ = one-hour equivalent noise level.		

### 4.13.3.5 Vibration

Potential sources of groundborne vibration include construction activities, railroad activities, and stationary sources. Table 4.13-10 lists vibration levels for construction equipment.

Equipment	Approximate PPV Vibration Level at 25 feet (inch/second)
Pile Driver, Impact (Upper Range)	1.518
Pile Drive, Impact (Typical)	0.644
Pile Driver, Sonic (Upper Range)	0.734
Pile Drive, Sonic (Typical)	0.170
Vibratory Roller	0.210
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003
SOURCE: FTA 2018. PPV = peak particle velocity	

Vibration impacts due to construction equipment were evaluated using these source vibration levels and the FTA criteria shown in Table 4.13-4. Vibration impacts due to railroad operations were evaluated using the FTA criteria shown in Table 4.13-5 and the FTA screening distances for each land use category. Vibration impacts due to stationary sources were addressed qualitatively.

### 4.13.4 Basis for Determining Significance

Thresholds used to evaluate noise impacts are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact would occur if the project would:

- 1) Generate 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;
- 2) Generate excessive groundborne vibration or groundborne noise levels; or
- 3) 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, expose people residing or working in the project area to excessive noise levels.

### 4.13.5 Impact Analysis

#### 4.13.5.1 Topic 1: Increase in Ambient Noise

*Would the project generate 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?*

The 2021 GPU Noise Element builds upon the adopted 2006 General Plan policies and provides noise compatibility guidelines. Table 4.13-11 summarizes the 2021 GPU noise compatibility guidelines provided in Table N-1 of the Noise Element.

Table 4.13-11 Community Noise Compatibility Matrix							
	Community Noise Exposure (CNEL)						
	55	60	65	70	75	80	
Residential – Low Density Single Family, Duplex, Mobile Homes	A						
				B			
					C		
Residential – Multiple Family						D	
	A						
				B			
Transient Lodging – Motels, Hotels					C		
							D
	A						
Schools, Libraries, Churches, Hospitals, Nursing Homes							
					C		
							D
Auditoriums, Concert Halls, Amphitheaters							
	B						
					C		
Sports Arena, Outdoor Spectator Sports							
	B						
						C	
Playgrounds, Neighborhood Parks							
	A						
					B		
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
						C	
							D
Office Buildings, Business Commercial and Professional	A						
					B		
						C	
Industrial, Manufacturing, Utilities, Agriculture							
	A						
						B	
						C	

Table 4.13-11 Community Noise Compatibility Matrix	
A	<p><b>Normally Acceptable:</b> Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.</p>
B	<p><b>Conditionally Acceptable:</b> New construction or development should be undertaken only after a detailed analysis of the noise reduction requirement is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.</p>
C	<p><b>Normally Unacceptable:</b> New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.</p>
D	<p><b>Clearly Unacceptable:</b> New construction or development should generally not be undertaken.</p>

The 2021 GPU Noise Element contains the following goals, policies, and actions that would be intended to address ambient noise.

***Goal***

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

***Policies***

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

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

N.1-3: Apply the community noise compatibility standards (Table N-1) to all new development and major redevelopment projects outside the noise and safety

- compatibility zones established in the March Air Reserve Base/Inland Port Airport Land Use Compatibility (ALUC) Plan in order to protect against the adverse effects of noise exposure. Projects within the noise and safety compatibility zones are subject to the standards contained in the ALUC Plan.
- N.1-4: Require a noise study and/or mitigation measures if applicable for all projects that would expose people to noise levels greater than the “normally acceptable” standard and for any other projects that are likely to generate noise in excess of these standards.
- N.1-5: Noise impacts should be controlled at the noise source where feasible, as opposed to at receptor end with measures to buffer, dampen, or actively cancel noise sources. Site design, building orientation, building design, hours of operation, and other techniques, for new developments deemed to be noise generators shall be used to control noise sources.
- N.1-6: Require noise buffering, dampening, or active cancellation, on rooftop or other outdoor mechanical equipment located near residences, parks, and other noise sensitive land uses.
- N.1-7: Developers shall reduce the noise impacts on new development through appropriate means (e.g. double-paned or soundproof windows, setbacks, berming, and screening). Noise attenuation methods should avoid the use of visible sound walls where possible.

### ***Actions***

- N.1-A: Continue to review proposed projects for conformance with the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, including consideration of the Compatibility Zone Factors shown in Table MA-1 and the Basic Compatibility Criteria shown in Table MA-2, as may be amended.
- N.1-C: Study the feasibility of using alternative pavement materials such as rubberized asphalt pavements on roadways to reduce noise generation. Update City standards as appropriate.

### ***Goal***

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

### ***Policies***

- N.2-1: Use the development review process to proactively identify and address potential noise compatibility issues.



- N.2-2: Continue to work with community members and business owners to address noise complaints and ensure voluntary resolution of issues through the enforcement of Municipal Code provisions.
- N.2-3: Limit the potential noise impacts of construction activities on surrounding land uses through noise regulations in the Municipal Code that address allowed days and hours of construction, types of work, construction equipment, and sound attenuation devices.
- N.2-4: Collaborate with the March Joint Powers Authority, March Inland Port Airport Authority, Riverside County Airport Land Use Commission, and other responsible agencies to formulate and apply strategies to address noise and safety compatibility protection from airport operations.
- N.2-5: Encourage residential development heavily impacted by aircraft-related noise to transition to uses that are more compatible.

### ***Actions***

- N.2-A: Continue to maintain performance standards in the Municipal Code to ensure that noise generated by proposed projects is compatible with surrounding land uses.
- N.2-B: Update the Municipal Code to establish controls on outdoor noise in public places, such as outdoor dining terraces in commercial mixed use areas, public plazas, or parks. Controls may include limits on noise levels or hours of operation.

## **a. Traffic Noise**

### ***Increase in Ambient Noise***

Long-term traffic noise that affects sensitive land uses would be considered substantial and constitute a significant noise impact if the project would:

- Increase noise levels by 5 dB or more where the no project noise level is less than 60 CNEL;
- Increase noise levels by 3 dB or more where the no project noise level is 60 CNEL to 65 CNEL; or
- Increase noise levels by 1.5 dB or more where the no project noise level is greater than 65 CNEL.

The noise analysis is based on the baseline (year 2018) and future (year 2040) traffic volume data. The traffic analysis included over 4,000 roadway segments within an approximate 10 to 15 miles radius of the Planning Area. For purposes of the noise analysis, only the 620 roadway segments located within the Planning Area were analyzed. The change in noise level was calculated for all 620 roadway segments, as well as I-215 and SR-60, for buildout of the project as well as buildout of the existing 2006 General Plan. Noise impacts were

determined by comparing the change in noise levels between the existing condition and buildout of the project to the criteria listed above. For informational purposes, this analysis also includes a discussion of the difference in impacts that would occur when compared to buildout of the existing 2006 General Plan.

Based on the impact criteria above, project buildout would result in a significant noise increase over existing ambient noise levels at 338 of the analyzed roadway segments. The impacted segments are summarized in Table 4.13-12. Complete calculations for all roadway segments are included in Appendix D.

Roadway	Segment	Existing Noise Level (CNEL at 50 feet)	GPU Year 2040 Noise Level (CNEL at 50 feet)	Noise Increase (dB)
Alessandro Boulevard	I-215 to Frederick Street	71.7 - 76.3	73.5 - 78.1	1.8 - 2.6
Alessandro Boulevard	Graham Street to Quincy Street	61.7 - 71.5	65.3 - 74.8	2.0 - 6.4
Alta Calle	Via Del Lago to Lake Perris Drive	63.7 - 63.8	67.4 - 68.7	3.6 - 4.9
Box Springs Road	I-215 to Pigeon Pass Road	68.0 - 69.5	71.0 - 72.1	2.6 - 3.0
Cactus Avenue	I-215 to Day Street	77	79.1	2.1
Cactus Avenue	Graham Street to Heacock Street	76	78.0 - 78.1	2.0 - 2.1
Cactus Avenue	Kitching Street to Lasselle Street	70.1	71.7	1.6
Cactus Avenue	Nason Street to Redlands Boulevard	65.5 - 68.8	70.8 - 72.4	3.2 - 5.5
Cottonwood Avenue	Elsworth Street to Morrison Street	54.9 - 67.1	62.6 - 69.6	2.3 - 7.7
Cottonwood Avenue	Moreno Beach Drive to Quincy Street	64.4	67.5 - 70.3	3.1 - 5.9
Day Street	Box Springs Road to Cactus Avenue	62.6 - 70.6	67.6 - 73.0	1.8 - 9.0
Dracaea Avenue	Indian Street to Perris Boulevard	56.1	61.5	5.4
Dracaea Avenue	Kitching Street to Lasselle Street	60.2	63.3	3.1
E Oleander Avenue	Lasselle Street to Alta Calle	63.3	61.6	8.3
Elsworth Street	Alessandro Boulevard to Cactus Avenue	65.6	70.6	5
Eucalyptus Avenue	I-215 to Moreno Beach Drive	62.0 - 68.8	69.2 - 71.8	2.0 - 7.6
Eucalyptus Avenue	Redlands Boulevard to Theodore Avenue	70.9	73.4	2.5
Evans Road	South of E Oleander Avenue	70.2	73	2.8
Frederick Street	Townsgate Avenue to Sunnymead Boulevard	70.7 - 71.3	73.0 - 73.5	2.2 - 2.3
Genetian Avenue	Heacock Street to Perris Boulevard	61.0 - 65.8	66.0 - 68.0	2.1 - 5.5
Gilman Springs Road	SR-60 to State Street	75.8 - 76.1	78.0 - 78.6	1.9 - 2.8
Graeber Street	Cactus Avenue to Riverside Drive	64.5 - 65.9	69.2	3.3 - 4.7
Graham Street	Sunnymead Boulevard to Eucalyptus Avenue	62.3	66.5	4.2
Graham Street	Dracaea Avenue to Cottonwood Avenue	58.6	64.2	5.6
Graham Street	Alessandro Boulevard to Cactus Avenue	62.9 - 64.3	66.2 - 68.7	3.3 - 4.4
Heacock Street	Cactus Avenue to San Michelle Avenue	68.4 - 72.3	70.3 - 74.9	1.6 - 3.5
Hidden Springs Drive	Pigeon Pass Road to Mountain View Road	47.4	64.3	16.9
Indian Street	SR-60 to Eucalyptus Avenue	60.3 - 61.0	64.5 - 65.0	3.5 - 4.3
Indian Street	John F Kennedy Drive to Iris Avenue	61.0 - 61.2	64.2 - 64.9	3.1 - 3.9
Indian Street	South of Krameria Avenue	62.1 - 63.6	65.8 - 69.6	3.2 - 6.9
Iris Avenue	Perris Boulevard to Via Del Lago	68.7 - 73.0	72.2 - 77.1	1.8 - 5.4
Ironwood Avenue	Graham Street to Heacock Street	66.5	69	2.5

**Table 4.13-12  
Significant Traffic Noise Increases Along Study Roadway Segments**

Roadway	Segment	Existing Noise Level (CNEL at 50 feet)	GPU Year 2040 Noise Level (CNEL at 50 feet)	Noise Increase (dB)
Ironwood Avenue	Perris Boulevard to Highland Boulevard	47.5 - 67.0	57.7 - 69.5	1.7 - 10.2
Jack Rabbit Trail	Northeast of Gilman Springs Road	66.3	70.1	3.8
John F Kennedy Drive	Heacock Street to Indian Street	68.4	70.1	1.7
John F Kennedy Drive	Kitching Street to Lasselle Street	68.1	70.5	2.4
John F Kennedy Drive	Moreno Beach Drive to Redlands Boulevard	69.5 - 70.9	72.6 - 73.4	2.5 - 3.8
Kitching Street	Sunnymead Boulevard to Alessandro Boulevard	59.5 - 66.9	64.6 - 70.6	3.3 - 5.1
Kitching Street	Iris Avenue to Krameria Avenue	64.3	69	4.7
Lake Perris Drive	South of Alta Calle	58.2 - 63.4	65.0 - 70.0	4.6 - 6.8
Lasselle Street	Eucalyptus Avenue to Evans Road	63.6 - 72.4	68.3 - 74.2	1.7 - 5.8
Manzanita Avenue	Indian Street to Reche Vista Drive	53.3 - 54.4	60.1 - 60.4	6.0 - 6.8
Moreno Beach Drive	Ironwood Avenue to Eucalyptus Avenue	67.8 - 68.6	70.4 - 74.7	3.2 - 6.1
Moreno Beach Drive	Cottonwood Avenue to Cactus Avenue	69.6 - 69.8	72.0 - 72.4	2.2 - 2.6
Moreno Beach Drive	John F Kennedy Drive to Via Del Lago	72.2	75.4	3.2
N. Webster Avenue	Harley Knox Boulevard to E Marjham Street	70.2 - 71.1	73.6	2.5 - 3.1
Nason Street	SR-60 to Iris Avenue	66.5 - 68.3	70.3 - 72.8	2.0 - 5.6
Old I-215 Frontage Road	Eucalyptus Avenue to Cactus Avenue	62.0 - 69.0	69.0 - 75.1	3.9 - 7.0
Perris Boulevard	Reche Vista Drive to Sunnymead Boulevard	67.2 - 72.9	71.6 - 74.5	1.6 - 4.4
Perris Boulevard	South of Alessandro Boulevard	69.0 - 72.5	73.3 - 76.1	1.8 - 5.7
Pigeon Pass Road	Hidden Springs Drive to Sunnymead Ranch Park	57.6 - 57.9	63.9 - 64.1	6.2 - 6.3
Reche Vista Drive	North of Heacock Street	70.2	72.7	2.5
Redlands Boulevard	San Timoteo Canyon Road to Cactus Avenue	69.9 - 72.6	73.2 - 75.3	2.2 - 6.1
Riverside Drive	Meyer Street to Graeber Street	57	65	8
San Michelle Avenue	Indian Street to Perris Boulevard	50	55.8	5.8
Sunnymead Boulevard	Frederick Street to Kitching Street	59.4 - 68.8	66.9 - 71.5	2.7 - 7.7
Sunnymead Ranch Parkway	Lake Vista Road to Heacock Street	53.5 - 66.9	63.8 - 68.7	1.8 - 10.3
Theodore Avenue	SR-60 to Alessandro Boulevard	64.7 - 67.4	69.7 - 80.0	5.0 - 13.3
Town Circle	North of Campus Parkway	64.6 - 66.5	69.1	2.6 - 4.5
Towngate Avenue	Eucalyptus Avenue to Frederick Street	65.6	71.2	5.6
Via Del Lago	John F Kennedy Drive to Alta Calle	64.2	68.7 - 69.0	4.5 - 4.8

CNEL = community noise equivalent level  
dB = decibels

It should be noted that without approval of the project, a significant increase in ambient noise levels would also occur with buildout with the existing 2006 General Plan. Based on the impact criteria above, a significant noise increase would occur at 339 of the analyzed roadway segments under buildout of the existing 2006 General Plan. A majority of the roadway segments that would be affected by a significant increase in ambient noise levels would be the same as those identified for buildout of both the project and existing 2006 General Plan. The two bullet lists below present the exceptions where some roadway segments would only

be affected by a significant increase in ambient noise levels under buildout of the project, or buildout of the existing 2006 General Plan:

- Project buildout would result in a significant increase in ambient noise levels at the roadway segments listed below. These roadway segments would not be impacted under buildout of the existing 2006 General Plan:
  - Alessandro Boulevard – Moreno Beach Drive to Quincy Street
  - Cactus Avenue – Kitching Street to Lasselle Street
  - Cottonwood Avenue – Indian Street to Perris Boulevard
  - Genetian Avenue – Indian Street to Perris Boulevard
  - Iris Avenue – Nason Street to the Moreno Valley Medical Center
  - Ironwood Avenue – Nason Street to Moreno Beach Drive
  - John F Kennedy Drive – Kitching Street to Lasselle Street
  - John F Kennedy Drive – Heacock Street to Indian Street
  - Kitching Street – Cottonwood Avenue to Alessandro Boulevard
  - Lasselle Street – Iris Avenue to College Drive
  - Lasselle Street – Eucalyptus Avenue to Dracaea Avenue
  - Lasselle Street – John F Kennedy Drive to Gentian Avenue
  
- Buildout of the existing 2006 General Plan would result in a significant increase in ambient noise levels at the roadway segments listed below. These roadway segments would not be impacted under buildout of the project:
  - Day Street – Box Springs Road to SR-90 Westbound Off-Ramp
  - Graham Street – Eucalyptus Avenue to Dracaea Avenue
  - Graham Street – Hemlock Avenue to Sunnymead Boulevard
  - Indian Street – Alessandro Boulevard to Brodiaea Avenue
  - Indian Street – Cottonwood Avenue to Bay Avenue
  - Ironwood Avenue – Heacock Street to Perris Boulevard
  - Kitching Street – South of Krameria Street
  - Krameria Street – Perris Boulevard to Emma Lane
  - Nason Street – Retail Driveway to Fir Avenue
  - Old Lake Drive – Pigeon Pass Road to Sunnymead Ranch Parkway
  - Reche Canyon Road – North of Reche Vista Drive
  - Sunnymead Ranch Parkway – Old Lake Drive to Village Drive
  - Sunnymead Ranch Parkway – Old Country Road to Perris Boulevard

The 2021 GPU Noise Element includes measures to reduce vehicle noise. Policy N.1-1 of the 2021 GPU seeks to protect existing uses from exposure to excessive noise adjacent to freeways and major roads, and Action N.1-B calls for the City to study the feasibility of using alternative pavement materials, such as rubberized asphalt pavements on roadways to reduce noise generation. The City is currently using rubberized asphalt pavement in some locations within the Planning Area. These measures would help minimize the increase in ambient traffic noise described above. However, the increase in ambient noise levels adjacent to the roadway segments listed above would likely remain at levels that would expose existing noise-sensitive receptors to a significant increase in ambient noise levels, and impacts would be significant.

### ***Land Use Compatibility***

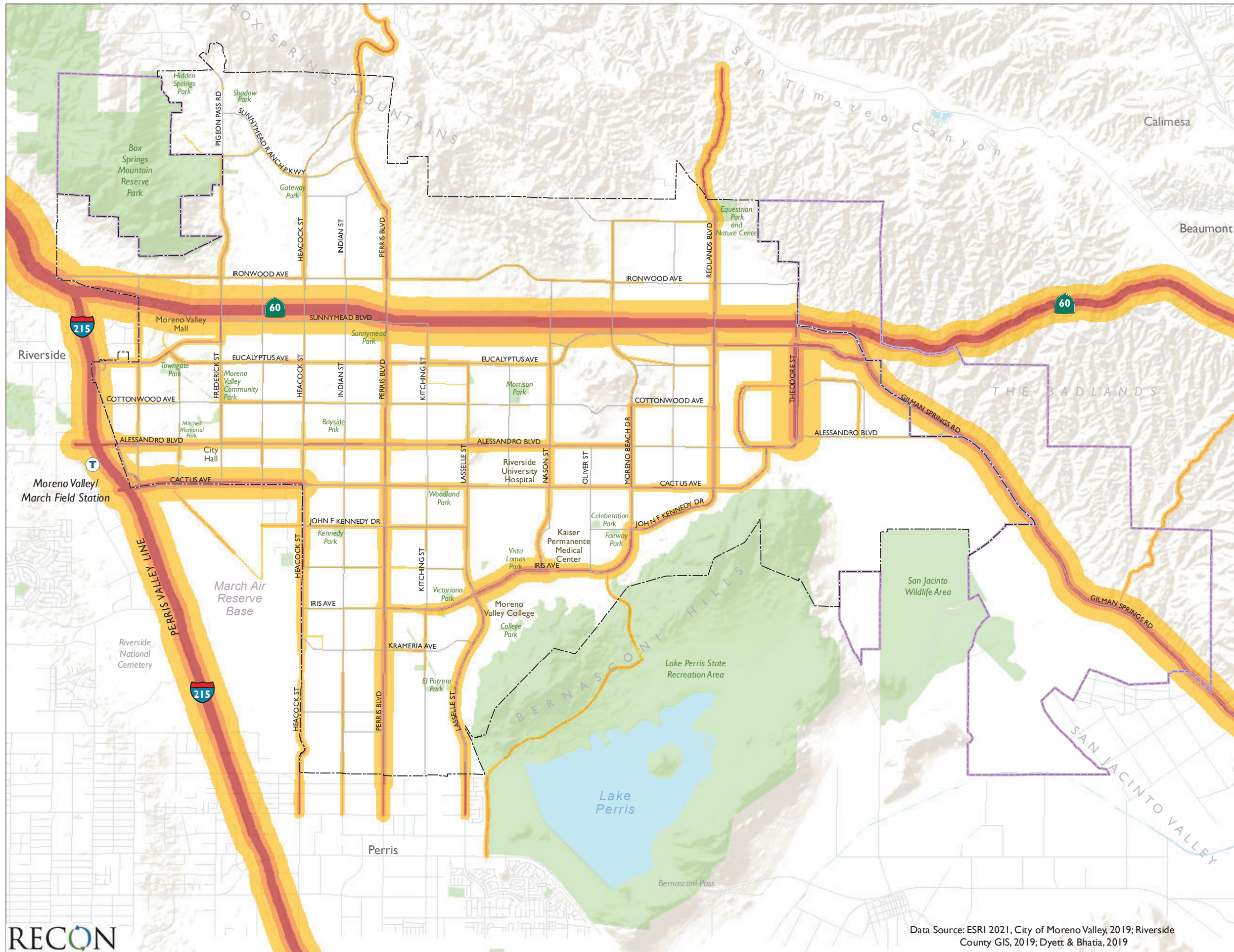
Future vehicle traffic noise contours are shown in Figure 4.13-4. A significant impact would occur if implementation of the project resulted in an exposure of people to current or future motor vehicle traffic noise levels that exceed standards established in the 2021 GPU Noise Element (see Table 4.13-9). The 2021 GPU land use plan proposes a variety of land uses, including residential; commercial, office, industrial, public, and parks. Most of the land use designations included in the 2021 GPU have been carried forward from the existing 2006 General Plan. The project primarily focuses future development and redevelopment within proposed Concept Areas. Portions of the Planning Area located outside of these proposed Concept Areas would retain the current land use designations established under the existing 2006 General Plan. Noise-sensitive uses that are developed near higher-volume roadways could experience noise levels in excess of the proposed 2021 GPU noise standards. The following is a discussion of the land use noise compatibility in each of the Concept Areas.

**Downtown Center.** The Downtown Center Concept Area would be located in the central portion of the city, bordered by Cottonwood Avenue to the north, Iris Avenue to the south, Lasselle Street to the west, and Oliver Street to the east. The Downtown Center designation would allow for a mix of business, entertainment, residential, cultural, and civic uses. The Downtown Center also encompass the two major medical centers in the Planning Area. Residential uses are “normally acceptable” with noise levels up to 65 CNEL and “conditionally acceptable” with noise levels up 70 CNEL. Office buildings, business commercial, and professional uses are “normally acceptable” with noise levels up to 70 CNEL and “conditionally acceptable” with noise levels up to between 75 and 80 CNEL.

Future vehicle traffic noise levels at the Downtown Center would range from less than 60 CNEL to 70 CNEL. Noise compatibility impacts at the commercial uses within the Downtown Center Concept Area would be less than significant; however, impacts at proposed residential uses would be potentially significant.

**Community Centers.** Two Community Center Concept Areas are proposed in the western portion of the city at the existing Moreno Valley Mall and The District shopping centers. The Moreno Valley Mall is generally bounded by SR-60 to the north, Towngate Boulevard to the south, Frederick Street to the east, and Day Street to the west. The District Community Center is generally bounded by Ironwood Avenue to the north, Hemlock Avenue and SR-60 to the south, Indian Street to the east, and Heacock Street to the west. The Center Mixed Use (CEMU) designation would allow for pedestrian-oriented places with a mix of uses including retail, dining, entertainment, offices, lodging, recreational and cultural facilities along with higher-density residential uses. Residential and lodging uses are “normally acceptable” with noise levels up to 65 CNEL and “conditionally acceptable” with noise levels up 70 CNEL.

Future vehicle traffic noise levels at the Moreno Valley Mall Concept Area would range from 60 to 75 CNEL. Noise compatibility impacts at residential uses within the Moreno Valley Mall Concept Area would be potentially significant.



City of Moreno Valley  
 Sphere of Influence  
**Future Noise Contours**  
 65 to 70 CNEL  
 70 to 75 CNEL  
 > 75 CNEL

**FIGURE 4.13-4**  
**Future (2040) Vehicle**  
**Traffic Noise Contours**

Future vehicle traffic noise levels at The District Concept Area would mostly range from 65 to 75 CNEL, and uses located closest to SR-60 could be exposed to noise levels over 75 CNEL. Noise levels would not exceed 80 CNEL. Noise compatibility impacts at residential uses within The District Concept Area would be potentially significant.

The project would also change the land use designation of the parcels adjacent to The District Concept Area to Business Park/Light Industrial. Industrial uses are “normally acceptable” with noise levels up to 75 CNEL and “conditionally acceptable” with noise levels up to 80 CNEL. Future vehicle traffic noise levels in this area would range from 60 to 70 CNEL. Noise compatibility impacts at the Business Park/Light Industrial parcels would be less than significant.

**Community Corridors.** Community Corridors Concept Areas are proposed along existing major transit corridors of Sunnymead Boulevard, Alessandro Boulevard, Perris Boulevard, and Heacock Street. The COMU designation would promote a mix of residential, commercial, and professional office uses. Residential uses are “normally acceptable” with noise levels up to 65 CNEL and “conditionally acceptable” with noise levels up to 70 CNEL. Office buildings, business commercial, and professional uses are “normally acceptable” with noise levels up to 70 CNEL and “conditionally acceptable” with noise levels up to between 75 and 80 CNEL.

Future vehicle traffic noise levels between Sunnymead Boulevard and SR-60 would range from 70 to over 75 CNEL, and noise levels south of Sunnymead Boulevard would range from 65 to 70 CNEL. Future vehicle traffic noise levels adjacent to Alessandro Boulevard, Perris Boulevard, and Heacock Street would range from less than 60 to 70 CNEL. Noise compatibility impacts at the commercial and professional uses within the Community Corridors Concept Area would be less than significant, however, impacts at proposed residential uses would be potentially significant.

**Highway Office/Commercial.** The Highway Office/Commercial Concept Area is proposed in the northeastern portion of the city, north of SR-60, south of Ironwood Avenue, west of World Logistics Parkway, and east of Moreno Beach Drive. The Highway Office/Commercial Concept Area envisions the creation of an inviting gateway of retail, commercial, office, and other uses (e.g., employment campus; educational campus). Office buildings, business commercial, and professional uses are “normally acceptable” with noise levels up to 70 CNEL and “conditionally acceptable” with noise levels up to between 75 and 80 CNEL.

Future vehicle traffic noise levels in this area would mostly range from 65 to 75 CNEL, and uses located closest to SR-60 could be exposed to noise levels over 75 CNEL. Noise levels would not exceed 80 CNEL. Noise compatibility impacts at the Highway Office/Commercial Concept Area would be potentially significant.

**Business Flex.** A Business Flex Concept Area is proposed in the western portion of the city, south of SR-60, generally along Alessandro Boulevard, and adjacent to March ARB. The Business Flex concept allows a range of light industrial and commercial businesses consistent with ALUCP regulations. The Business Flex Concept Area would provide for business activities involving production, distribution, or repair with supporting office and commercial

space. Industrial and manufacturing uses are “normally acceptable” with noise levels up to 75 CNEL and “conditionally acceptable” with noise levels up to 80 CNEL.

Future vehicle traffic noise levels in this area would range from 60 to 75 CNEL. Industrial uses would be considered “normally acceptable” in the Business Flex Concept Area. Noise compatibility impacts would be less than significant.

**Residential Density Changes.** The project includes targeted residential density changes to provide for higher density housing to support the meeting of state obligations under RHNA. Residential uses are “normally acceptable” with noise levels up to 65 CNEL and “conditionally acceptable” with noise levels up to 70 CNEL. The residential density change areas are located in the following four general areas:

- Between Sunnymead Boulevard, Cottonwood Avenue, Heacock Street, and Perris Boulevard. Future vehicle traffic noise levels in this area would range from less than 60 CNEL to 70 CNEL. Noise compatibility impacts at proposed residential uses closest to SR-60 would be potentially significant.
- South of Ironwood Avenue and north of SR-60 along Moreno Beach Drive. Future vehicle traffic noise levels in this area would range from less than 60 CNEL to 75 CNEL, and may exceed 75 CNEL at areas closest to SR-60. Noise compatibility impacts at proposed residential uses would be potentially significant.
- The area between Moreno Beach Drive, Eucalyptus Avenue, Quincy Street, and Cottonwood Avenue. Future vehicle traffic noise levels in this area would range from less than 60 CNEL to 65 CNEL. Noise compatibility impacts at proposed residential uses would be less than significant.
- Southwest of the intersection of Krameria Avenue and Perris Boulevard. Future vehicle traffic noise levels in this area would range from 60 CNEL to 75 CNEL. Noise compatibility impacts at proposed residential uses closest to Perris Boulevard would be potentially significant.

2021 GPU Policies N.1-1, N.1-2, N.1-3, N.1-4, N.1-7, N.2-1 intend to reduce transportation-related noise and require developers to reduce noise impacts on new development through appropriate means including double-paned or soundproof windows, setbacks, berming, and screening. Future discretionary proposals within the Planning Area would be required to conduct site-specific exterior noise analyses to demonstrate that the proposed development would not place sensitive receptors in locations where the exterior existing or future noise levels would exceed the land use compatibility standards. Additionally, all future development located in areas where exterior noise levels exceed the land use compatibility standards as defined in the 2021 GPU Noise Element, site-specific interior noise analyses demonstrating compliance with the interior noise standards of Title 24 and the 2021 GPU would be required. These requirements for site-specific noise analyses would be implemented through submission of a Title 24 Compliance Report to demonstrate interior noise levels of 45 CNEL. Through implementation of this regulatory framework, exterior and interior traffic noise impacts associated with new development would be less than significant.



## b. Railroad Noise

At the closest distance, the Planning Area boundary is located approximately 200 feet from the railroad tracks of the San Jacinto Branch Line that closely follows the I-215 corridor. Using the parameters discussed in Section 4.13.3.2, the noise level at 200 feet as well as the noise contour distances were calculated. The results are summarized in Table 4.13-13.

Station	Noise Level at 200 feet (CNEL)	Distance to Noise Contour (feet)		
		70 CNEL	65 CNEL	60 CNEL
Moreno Valley/March Field	58	15	40	130
CNEL = community noise equivalent level				

As shown in Table 4.13-13, railroad noise levels within the Planning Area are not projected to exceed 60 CNEL. It should also be noted that because the railroad tracks parallel the I-215 corridor and I-215 lies between the railroad tracks and the Planning Area in most locations, noise levels at the western boundary of the Planning Area are significantly dominated by vehicle traffic on I-215. Therefore, while the trains may be audible while they are passing by, they do not contribute to the overall ambient noise levels adjacent to the I-215 corridor, and railroad noise impacts would be less than significant.

## c. Stationary Noise

A significant impact would occur if implementation of the project resulted in the exposure of people to noise levels that exceed property line limits established in Municipal Code under Title 11 Peace, Morals and Safety, Chapter 11.80, Noise Regulation. Stationary sources of noise include activities associated with a given land use. For example, noise sources from commercial land uses would include car washes, fast food restaurants, auto repair facilities, parking lots, and a variety of other uses. Noise generated by residential or commercial uses is generally short-lived and intermittent, while noise generated by auto-oriented commercial and industrial uses is usually sporadic, highly variable, and spatially distributed. Noise sources from industrial uses would include mechanical equipment, generators, and trucks. Industrial uses are largely concentrated in the southwest of the city, adjacent to MARB and I-215. Additionally, significant light industrial uses have been approved at the World Logistics Center site at the eastern edge of the city. While industrial uses are generally concentrated at the periphery of the city, the potential for noise conflicts exists where these uses would abut residential areas. Additionally, potential noise conflicts could occur in mixed-use areas where residential uses are located in close proximity to commercial and retail uses.

The type of land uses proposed under the 2021 GPU would be similar to the land uses that currently exist in the Planning Area. Although the 2021 GPU would introduce five new land use designations, the allowed uses would be similar to what currently exists within the Planning Area. The 2021 GPU would primarily focus future development and redevelopment within the proposed Concept Areas that consist of clusters of vacant and underutilized land within the city limit that would increase density along existing corridors. Noise levels within

the Planning Area are currently dominated by vehicle traffic on freeways and heavily traveled area roadways, and would continue to be the primary source of noise under project buildout. Therefore, future noise levels from stationary sources throughout the Planning Area would not be expected to increase the hourly or daily average sound level with respect to current conditions. While noise-sensitive residential land uses would be exposed to noise associated with the operation of commercial and industrial uses, future development would be required to show compliance with the Noise Regulation of the Municipal Code. As detailed in Section 4.13.2.4, the City regulates specific noise level limits allowable between land uses including limits on hours of operation for various noise-generating activities, guidance for measuring potential noise violations, and violation procedures. Additionally, 2021 GPU Policy N.2-2 and Actions N.2-A and N.2-B state that the City will continue to work with the community to address noise complaints through enforcement of Municipal Code provisions, and to update the Municipal Code to establish controls on outdoor noise in public places. Through enforcement of the Noise Regulation of the Municipal Code and 2021 GPU policies and actions would ensure that future development would not result in a substantial permanent increase in ambient noise levels, and impacts would be less than significant.

#### **d. Construction Noise**

Future development implemented under the project could result in a temporary ambient noise increase due to construction activities. Due to the developed nature of the Planning Area, there is a high likelihood that construction activities would take place adjacent to existing structures and that sensitive receptors would be located in proximity to construction activities.

Construction noise typically occurs intermittently and varies depending upon the nature or phase of construction (e.g., demolition; land clearing, grading, and excavation; erection). Construction noise would be short term and would include noise from activities such as site preparation, truck hauling of material, pouring of concrete, and the use of power tools. Noise would also be generated by construction equipment use, including earthmovers, material handlers, and portable generators, and could reach high noise levels for brief periods.

As discussed in Section 4.13.3.4 above, hourly average noise levels would be approximately 83 dB(A)  $L_{eq}$  at 50 feet from the center of construction activity when assessing three pieces of common construction equipment working simultaneously. Noise levels would vary depending on the nature of the construction activities including the duration of specific activities, the equipment involved, the location of the sensitive receivers, and the presence of intervening barriers. Construction noise levels of 83 dB(A)  $L_{eq}$  at 50 feet would attenuate to 80 dB(A)  $L_{eq}$  at 70 feet. Therefore, significant impacts would occur if sensitive land uses are located closer than 70 feet of construction activities.

The City regulates construction noise through Sections 8.14.040(E) and 11.80.030(D)(7) of the Municipal Code by limiting construction activities to 7:00 a.m. to 7:00 p.m. from Monday through Friday excluding holidays and from 8:00 a.m. to 4:00 p.m. on Saturdays. 2021 GPU Policy N.2-3 would also require the enforcement of the regulations in the Municipal Code to reduce potential construction noise impacts. However, construction activities associated with

any individual development may occur near noise-sensitive receptors. Depending on the project type, equipment list, time of day, phasing, and overall construction durations, noise disturbances may occur for prolonged periods of time or during the more sensitive nighttime hours. Therefore, construction noise impacts would be considered potentially significant.

### **4.13.5.2 Topic 2: Vibration**

*Would the project generate excessive groundborne vibration or groundborne noise levels?*

#### **a. Construction**

Construction activities may include demolition of existing structures, site preparation work, excavation of parking and subfloors, foundation work, and building construction. Demolition for an individual site may last several weeks to months and may produce substantial vibration. Excavation for underground levels could also occur on some development sites, and vibratory pile driving could be used to stabilize the walls of excavated areas. Piles or drilled caissons may also be used to support building foundations.

As with any type of construction, vibration levels during any phase may at times be perceptible. However, non-pile driving or foundation work construction phases that have the highest potential of producing vibration (such as jackhammering and other high power tools) would be intermittent and would only occur for short periods of time for any individual development site. By use of administrative controls, such as scheduling construction activities with the highest potential to produce perceptible vibration to hours with least potential to affect nearby properties, perceptible vibration can be kept to a minimum and as such would result in a less than significant impact with respect to perception.

Pile driving has the potential to generate the highest groundborne vibration levels and is the primary concern for structural damage when it occurs within close proximity of structures. As shown in Table 4.13-11, vibration generated by construction equipment has the potential to be substantial, since it has the potential to exceed the FTA criteria for architectural damage (e.g., 0.12 PPV for fragile or historical resources, 0.2 PPV for non-engineered timber and masonry buildings, and 0.3 PPV for engineered concrete and masonry). Construction details and equipment for future project-level development is not known at this time. Therefore, construction vibration impacts would be considered potentially significant.

#### **b. Railroad**

As discussed in Section 4.13.1.5 above, the San Jacinto Branch Line closely follows the I-215 corridor, bordering the western edge of the city. Both the Metrolink commuter rail and freight trains travel along the corridor. Vibration impacts due to the proximity of land uses to the rail corridor were analyzed using the FTA criteria shown in Table 4.13-5 and recommended screening distances.

For Category 1 uses such as vibration sensitive equipment, the screening distance from the right-of-way is 600 feet. These uses include research and manufacturing facilities with special vibration constraints. The 600-foot buffer from the railroad tracks slightly cross into

the Planning Area at the two westernmost point of the City limits where Eucalyptus Road and Box Springs Road intersect with I-215. The land uses within this 600-foot buffer mostly include right-of-way and very small portions of residential land uses. No Category 1 land uses would be constructed within 600 feet of the railroad tracks. For Category 2 land uses such as residences and buildings where people would normally sleep, the screening distance is 200 feet. The screening distance for Category 3 land uses such as institutional land uses with primarily daytime uses, is 120 feet. The Planning Area boundaries are more than 200 feet from the railroad tracks. Therefore, vibration impacts due to railroad activity would be less than significant.

### **c. Stationary Sources**

Industrial manufacturing operations occasionally utilize equipment or processes that have a potential to generate groundborne vibration. However, vibrations found to be excessive for human exposure that are the result of industrial machinery are generally addressed from an occupational health and safety perspective. The residual vibrations are typically of such low amplitude that they quickly dissipate into the surrounding soil and are rarely perceivable at the surrounding land uses. Residential and commercial uses do not typically generate vibration. Therefore, vibration impacts associated with stationary sources would be less than significant.

#### **4.13.5.3 Topic 3: Airports**

*Would the project expose people residing or working in the project area to excessive aircraft noise levels?*

As discussed in Section 4.13.1.4 above, the MARB is a joint-use civilian and military facility located southwest of the Planning Area. As shown in Figure 4.9-2 in Section 4.9, Hazards and Hazardous Materials, portions of the Planning Area are located within the airport compatibility zones B1-APZ II, C1, and D. The MARB noise contours in relation to the Planning Area are shown in Figure 4.13-3. Compatibility zone B1 is within or near the 65 CNEL contour, and compatibility zone C1 is within or near the 60 CNEL contour.

As discussed in Section 4.13.2.3 above, the noise level considered normally acceptable for new residential land uses is 65 CNEL. The ALUCP also indicates that the maximum acceptable interior noise level is 40 CNEL for noise-sensitive land uses (residences, schools, libraries, museums, hotels and motels, hospitals and nursing homes, places of worship, etc.) and 45 CNEL for office uses. The ALUCP requires that an acoustical study be complete for new noise-sensitive land uses that are located within the 60 CNEL contour.

The 65 CNEL noise contour crosses into the City in two locations identified as compatibility zone B1: the southwestern corner of the City west of Indian Street and south of San Michele Road, and the western edge of the City near the intersection of Old 215 Frontage Road and Alessandro Boulevard. The proposed land use designations in these areas are Business Park/Light Industrial, Business Flex, Commercial, and Open Space. No residential land uses are located in areas where MARB noise levels exceed 65 CNEL. The 60 CNEL contour crosses into the western portion of the City in locations identified as compatibility zone C1. The land

use proposed designations in these areas include those identified above as well as R3 Residential.

The land use restrictions for each of the compatibility zones provides limitations to development to minimize potential hazards including noise exposure. Development within the Air Installation Compatible Use Zone is subject to development standards and restrictions as set forth in Municipal Code Section 9.07.060. Future development that would be located within the city's special zone and/or within the ALUC compatibility zones would be required to adhere to all special regulations, including Municipal Code development standards and specific land use regulations regarding aircraft noise. 2021 GPU Policies N.1-3, N.2-4, and N.2-5 and Action N.1-A also reinforce the standards contained in the ALUCP. Therefore, adherence with the noise requirements of the ALUCP, the Municipal Code, and associated FAA requirements would ensure that future development would not expose people to excessive aircraft noise levels, and impacts would be less than significant.

### 4.13.6 Cumulative Analysis

The analysis of vehicle traffic noise provided above is cumulative in nature because the analysis considers noise impacts associated with buildout of the entirety of the Planning Area and the traffic assumptions used in the analysis include cumulative traffic associated with regional growth. Cumulatively, there would be a substantial amount of additional new future development and associated travel demand within the Planning Area and in the surrounding region. The residences and other sensitive land uses located along most of the Planning Area roadways are currently affected by the existing traffic noise, and cumulative growth would result in a significant increase in ambient noise and would potentially result in noise levels that exceed the City's compatibility standards. Therefore, noise impacts associated with ambient noise increases and land use compatibility would be cumulatively considerable and would remain significant and unavoidable.

Stationary source of noise, construction noise, and vibration are generally localized impacts that do not have regional or cumulative considerations. Noise sources associated with past, present, and future development in the region include construction equipment, landscape and building maintenance activities, mechanical equipment, solid waste collection, parking lots, commercial, office, and industrial activities, and residential, school, and recreation activities and events. Noise sources that are adjacent to one another could combine to increase cumulative noise levels. However, stationary noise sources within the Planning Area would not generally combine with noise sources outside the Planning Area to create a cumulative increase in stationary noise. Through enforcement of the Municipal Code, cumulative noise and vibration impacts associated with stationary sources would be less than significant. However, noise and vibration impacts associated with construction activities would be potentially cumulatively significant.

## 4.13.7 Significance of Impacts before Mitigation

### 4.13.57.1 Topic 1: Increase in Ambient Noise

#### a. Traffic Noise

##### *Increase in Ambient Noise*

The increase in ambient noise levels adjacent to roadway segments listed in Section 4.13.5.1 would expose existing noise-sensitive receptors to a significant increase in ambient noise levels, and impacts would be significant.

##### *Land Use Compatibility*

Future development proposals within the Planning Area would be required to conduct site-specific exterior and interior noise analyses to demonstrate that the proposed development would not place sensitive receptors in locations where the existing or future noise levels would exceed the land use compatibility standards. Impacts associated with future development would be less than significant.

#### b. Railroad Noise

Railroad noise levels would not exceed 60 CNEL within the Planning Area, and impacts would be less than significant.

#### c. Stationary Noise

Through enforcement of the Noise Regulation of the Municipal Code and 2021 GPU policies and actions, impacts associated with stationary sources of noise would be less than significant.

#### d. Construction Noise

Construction activities associated with any individual development may occur near noise-sensitive receptors and noise disturbances may occur. Therefore, construction noise impacts would be considered potentially significant.

### 4.13.57.2 Topic 2: Vibration

Construction details, locations, and equipment for future project-level developments under the 2021 GPU are not known at this time but may cause vibration impacts. Therefore, construction vibration impacts would be considered potentially significant.

Vibration impacts due to railroad activities and stationary source would be less than significant.

### **4.13.57.3 Topic 3: Airports**

Adherence with the noise requirements of the ALUCP, the Municipal Code, and associated FAA requirements would ensure that future development would not expose people to excessive aircraft noise levels, and impacts would be less than significant.

## **4.13.8 Mitigation**

### **4.13.8.1 Topic 1: Increase in Ambient Noise**

#### **a. Traffic Noise**

Impacts associated with the increase in ambient noise ~~and land-use compatibility~~ would be significant without mitigation. For existing noise sensitive land uses, possible noise-reduction measures would include retrofitting older structures with acoustically rated windows and doors featuring higher Sound Transmission Class ratings, which is a measure of exterior noise reduction performance. However, there is no mechanism in place for implementing such a retrofit program. Because the significant noise impacts would be to existing homes and other noise-sensitive uses in an already urbanized area, there is no feasible mitigation. Therefore, impacts to existing sensitive land uses would remain significant and unavoidable.

#### **b. Railroad Noise**

Impacts would be less than significant. No mitigation is required.

#### **c. Stationary Noise**

Impacts would be less than significant. No mitigation is required.

#### **d. Construction Noise**

Impacts related to construction noise would be significant and the following mitigation shall be applied to future development:

**NOS-1:** The Director of Community Development or his or her designee shall require applicants to demonstrate whether the project has the potential to exceed noise standards contained in Sections 8.14.040(E) and 11.80.030(D)(7) of the Municipal Code. If a project may exceed standards or is located adjacent to sensitive receptors, the City may require the applicant to prepare a Noise Analysis that estimates construction noise and identifies noise reduction measures that would ensure compliance with Municipal Code standards. Construction plans submitted to the City shall identify applicable measures on demolition, grading, and construction plans submitted to the City. Noise reduction measures can include, but are not limited to, the following:

1. Demolition, construction, site preparation, and related activities that would generate noise perceptible at the property line of the subject property are limited to the hours between 7:00 a.m. to 7:00 p.m. from Monday through Friday excluding holidays and from 8:00 a.m. to 4:00 p.m. on Saturdays. The building inspector may issue an exception to this limitation on hours in cases of urgent necessity where the public health and safety will not be substantially impaired.
2. Idling times for noise-generating equipment used in demolition, construction, site preparation, and related activities shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes.
3. Demolition, construction, site preparation, and related activities within 70 feet from the edge of properties with existing, occupied noise-sensitive uses shall incorporate all feasible strategies to reduce noise exposure for noise-sensitive uses, including:
  - a. Provide written notice to all known occupied noise-sensitive uses within 400 feet of the edge of the project site boundary at least 2 weeks prior to the start of each construction phase of the construction schedule;
  - b. Ensure that construction equipment is properly maintained and equipped with noise control components, such as mufflers, in accordance with manufacturers' specifications;
  - c. Re-route construction equipment away from adjacent noise-sensitive uses;
  - d. Locate noisy construction equipment away from surrounding noise-sensitive uses;
  - e. Use sound aprons or temporary noise enclosures around noise-generating equipment;
  - f. Position storage of waste materials, earth, and other supplies in a manner that will function as a noise barrier for surrounding noise-sensitive uses;
  - g. Use the quietest practical type of equipment;
  - h. Use electric powered equipment instead of diesel or gasoline engine powered equipment; Use shrouding or shielding and intake and exhaust silencers/mufflers; and
  - i. Other effective and feasible strategies to reduce construction noise exposure for surrounding noise-sensitive uses.
4. For construction of buildings that require the installation of piles, an alternative to installation of piles by hammering shall be used. This could



include the use of augured holes for cast-in-place piles, installation through vibration or hydraulic insertion, or another low-noise technique.

#### **4.13.8.2 Topic 2: Vibration**

##### **a. Construction**

Impacts related to construction vibration would be significant and the following mitigation shall be applied to future development:

**NOS-2:** Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving and static rollers as opposed to vibratory rollers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.

##### **b. Railroad**

Impacts would be less than significant. No mitigation is required.

##### **c. Stationary Sources**

Impacts would be less than significant. No mitigation is required.

#### **4.13.8.3 Topic 3: Airports**

Impacts would be less than significant. No mitigation is required.

## **4.13.9 Significance of Impacts after Mitigation**

### **4.13.59.1 Topic 1: Increase in Ambient Noise**

#### **a. Traffic Noise**

Impacts to existing sensitive land uses located in areas that would experience a significant increase in ambient noise levels exceeding the applicable land use and noise compatibility level would be significant and unavoidable at this program level of review.

#### **b. Railroad Noise**

Impacts would be less than significant. No mitigation is required.

#### **c. Stationary Noise**

Impacts would be less than significant. No mitigation is required.

#### **d. Construction Noise**

Mitigation Measure NOS-1 would reduce construction noise exposure. However, for construction sites that are adjacent to noise-sensitive uses, there still could be a substantial temporary increase in noise levels that could lead to adverse noise-related impacts. Therefore, impacts would remain significant and unavoidable.

### **4.13.59.2 Topic 2: Vibration**

#### **a. Construction**

Mitigation Measure NOS-2 would reduce construction-related vibration impacts to a level less than significant.

#### **b. Railroad**

Impacts would be less than significant. No mitigation is required.

#### **c. Stationary Sources**

Impacts would be less than significant. No mitigation is required.

### **4.13.59.3 Topic 3: Airports**

Impacts would be less than significant. No mitigation is required.

## 4.14 Population/Housing

This section analyzes potentially significant impacts associated with population and housing that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan. The analysis area covers the entire city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area). Within the analysis, Concept Areas refers to those areas where the GPU proposes land use changes as shown on Figure 3-1.

### 4.14.1 Existing Conditions

#### 4.14.1.1 Population and Housing Trends

The Southern California Association of Governments (SCAG) is the metropolitan planning organization responsible for developing and adopting regional housing, population, and employment growth forecasts for local governments from Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. To facilitate regional planning efforts, SCAG's planning area is further organized into 14 sub-regions. The city is one of 15 Riverside County cities located in the Western Riverside Council of Governments (WRCOG) sub-region. Table 4.14-1 presents SCAG growth projections for population, households, and jobs within Moreno Valley through 2040. The regional and city population and housing trends are discussed further below.

	Existing (2018)	SCAG Projected (2040)	Increment
Population	208,297	256,600	48,303
Households	52,008	73,000	20,992
Employment	44,331	83,200	38,869
SOURCE: SCAG 2016.			

#### a. Population

##### *Region*

Pursuant to the SCAG's 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) population projections for the WRCOG sub-region are estimated to

increase to 22.1 million people by the year 2040. This equates to a future growth rate of approximately 0.7 percent (SCAG 2016).

### ***City of Moreno Valley***

As shown in Table 4.14-1 above, SCAG estimated that the city's population was 208,297 in 2018. SCAG projects that the city's population would increase to 256,600 people by the year 2040, which would constitute an approximately 23.2 percent increase over a 22-year period (SCAG 2016).

## **b. Housing**

### ***Region***

The average household size within the SCAG region increased from 3.0 in 2010 to 3.1 in 2015. Also, within this time period, the annual average growth rate of households within the SCAG region was 0.3 percent from 2010-2015, leading to a housing shortage throughout the region despite an increase in housing production. In 2014, 40,000 residential building permits were approved with the permits for multiple housing units accounting for over 60 percent of total residential building permits from 2010-2015 (2016 SCAG).

### ***City of Moreno Valley***

As shown in Table 4.14-1 above, SCAG estimated that the city had 52,008 households in 2018. The city's residential areas are characterized by a mix of minimum lot sizes that range from 4,500 square feet up to 1 acre or more as designated by current zoning. There are also smaller lots which have been developed under Planned Unit Developments, as well as some zero lot line tracts that were developed before City incorporation. Larger lots are generally located in the northern portion of the city above State Route 60 (SR-60) and multi-family zoning is more prevalent in the western portion of the city below and surrounding SR-60, west of Kitching Street. Single-family residential zoning is the overwhelming majority of current land zoning and development within the city limit; approximately 9,375 acres or 28 percent of citywide land is zoned single-family residential. SCAG projects that the number of households in the city would increase to 73,000 by the year 2040, which would constitute an approximately 40 percent increase over a 22-year period (SCAG 2016).

## **4.14.2 Applicable Regulatory Requirements**

### **4.14.2.1 State Regulations**

#### **a. Senate Bill 375**

Senate Bill 375 (SB 375), the Sustainable Communities and Climate Protection Act, was approved in 2008. SB 375 provides incentives for cities and developers to bring housing and jobs closer together and to improve public transit. The goal is to reduce the number and length of automobile commuting trips, helping to meet the statewide targets for reducing greenhouse gas emissions set by Assembly Bill 32 (see Greenhouse Gas discussion in

Section 4.8 of this Environmental Impact Report). As a part of this effort, SB 375 requires each metropolitan planning organization to add a broader vision for growth to its transportation plan - called a Sustainable Communities Strategy (SCS; see Section 4.14.2.2(a)).

SB 375 also requires the Regional Housing Needs Assessment (RHNA) be completed every eight years and, if a jurisdiction does not meet this requirement, penalties may be incurred.

### **b. Regional Housing Needs Assessment**

In response to a growing population, combined with high housing costs, California has enacted a law that requires SCAG and other councils of governments to periodically distribute the state identified housing needs for their region. Local jurisdictions are required by state law (Government Code Section 65580 et seq.) to plan for their fair share of projected housing construction needs in their region over a specified planning period.

As part of the current planning process, the City is updating the Housing Element for an eight-year planning period spanning October 2021 through October 2029 (Sixth Cycle Housing Element Update; 2021-2029 Housing Element). The City's RHNA allocation for the Sixth Cycle Housing Element Update is a total of 13,627 units of total new construction, allocated by income level categories as follows:

Very Low income units	3,779 unit (28 percent of total)
Low income units:	2,051 units (15 percent of total)
Moderate income units:	2,165 units (16 percent of total)
Above Moderate income units:	5,632 units (41 percent of total)

Government Code Section 65583.2(c) states that the inventory of housing element opportunity sites for the 2021-2029 Housing Element may not include a non-vacant site identified in a prior housing element or a vacant site identified in two or more consecutive planning periods that was not approved for developing housing to meet housing need unless it meets certain additional criteria. The additional criteria include the site being able to be developed at a higher density and also subject to a program in the housing element requiring rezoning within three years of the start of the planning period to allow residential-by-right for housing in which at least 20 percent of the units are affordable to lower income households.

The City's housing sites inventory included in the previous two housing elements relied heavily on the use of vacant sites. Therefore, any lower income vacant sites that were listed in the prior housing elements and also planned for use in the 2021-2029 Housing Element will be subject to the by-right and 20 percent inclusionary requirements.

### **4.14.2.2 Regional Regulations**

#### **a. SCAG Regional Transportation Plan/Sustainable Communities Strategy**

The analysis herein is based on regional growth forecasts included in the 2016 SCAG RTP/SCS adopted April 7, 2016<sup>1</sup>. The RTP/SCS was adopted to assist in the development of long-range regional plans and strategies that provide for efficient movement of people, goods and information; enhance economic growth and international trade; and improve the environment and quality of life, which must lay out a plan to meet the region's transportation, housing, economic, and environmental needs in a way that enables the area to lower greenhouse gas emissions (2016 SCAG). Specifically, the 2016 RTP/SCS sets the strategies for participating cities to establish transit areas and livable corridors within their jurisdictions, to account for affordable housing and population growth, and ensure a standard of environmental justice for all residents.

### **4.14.2.3 Local Regulations**

#### **a. Municipal Code**

Title 9, Planning and Land Use of the Municipal Code contains requirements and standards for the management of future growth throughout the city through development regulations that dictate the physical development of land and the kinds of uses allowed on each individual property within the Planning Area. The Municipal Code implements the General Plan, providing specific requirements for lot size, building placement, density of development, and height in addition to regulating allowable uses.

### **4.14.3 Methodologies for Determining Impacts**

The potential for significant population and housing impacts were evaluated through a comparison of project buildout with data derived from 2016 SCAG RTP/SCS.

### **4.14.4 Basis for Determining Significance**

Thresholds used to evaluate impacts related to housing and population are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines

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<sup>1</sup>This analysis relies on the 2016-2040 RTP/SCS (SCAG 2020) as that was the planning document in place at the time of the Notice to Proceed. Since that time, SCAG has adopted its 2020-2045 RTP/SCS (Connect SoCal). The SCAG projections that are included herein represent planning efforts through the year 2040. The time period utilized for this analysis is appropriate considering the estimate data is the most current available information for the existing conditions and that the project is intended to address buildout through 2040 which is consistent with the 2016-2040 RTP/SCS.

(California Code of Regulations Sections 15000-15387), Appendix G. A significant impact would occur if the project would:

- 1) 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 roads or other infrastructure)?
- 2) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

## 4.14.5 Impact Analysis

### 4.15.5.1 Topic 1: Induce Unplanned Population Growth

*Would the project 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 roads or other infrastructure)?*

As detailed in Chapter 3.0, Project Description, the project includes an update to the City's Housing Element to meet the City's RHNA allocation obligations for the Sixth Cycle Housing Element Update, which is a total of 13,627 units of total new construction. Targeted residential density changes are included to provide for higher density housing to support the meeting of state obligations under RHNA. New residential opportunities would be located within the Concept Areas shown in Figure 3-1.

Table 4.14-2 compares existing residential units and employment square footage in 2018 with what is projected to occur in 2040 under buildout of the project. As shown in Table 4.14-2, buildout of the project would result in development of approximately 22,052 new homes, which is greater than the RHNA allocation assigned to the city of 13,627 new homes. This exceedance of the RHNA allocation would provide a buffer in all income categories to ensure the city can navigate the no net loss provisions of the state Housing Element law and have continued ability to meet the RHNA by income group throughout the planning period.

	Residential Units			Employment			
	Low Density	Medium-High Density	Total Units	Commercial/Retail (sq. ft.)	Office (sq. ft.)	Light Industrial (sq. ft.)	Total Jobs
2018	45,922	9,406	55,328	6,525,678	465,215	5,824,148	44,331
2040	52,130	25,250	77,380	9,031,218	2,386,955	51,759,472	83,246
<b>Change</b>	<b>6,208</b>	<b>15,844</b>	<b>22,052</b>	<b>2,505,540</b>	<b>1,921,740</b>	<b>45,935,324</b>	<b>38,915</b>
SOURCE: California Department of Finance 2019; United States Census 2020; SCAG 2016; Dyett & Bhatia 2020b.							

The results of the buildout summary presented above were then utilized to compare projections for population, housing, and employment under buildout of the project to 2040 SCAG projections. Applying a vacancy rate of 6 percent to the projected 77,380 constructed housing units in 2040, it is estimated that the project buildout would result in 72,737 households. Table 4.14-3 presents a comparison of the 2040 SCAG projections for population, housing, and employment to what is projected under buildout of the project. As shown in Table 4.14-3, the projected project buildout of 72,737 households in 2040 would be less than the 2040 SCAG household projection of 73,000. Similarly, the project's projected population size of 252,179 would be less than the 2040 SCAG projection of 256,600. This difference in population is due to the greater share of multi-family units that would likely result under buildout of the project compared to buildout of the existing 2006 General Plan, as multi-family units typically have a lower household population.

The project would slightly increase the number of jobs to 83,246 compared to the SCAG 2040 growth projection of 83,200. However, this slight increase in approximately 46 jobs would have a negligible effect on future growth that would be offset by the decrease in population and households compared to SCAG 2040 growth projections. Furthermore, the project has been designed to primarily focus future development and redevelopment within Concept Areas that consist of vacant or underutilized land along major transit corridors. Future development outside of the Concept Areas would occur in areas that are already served by infrastructure and would not require extensions into unserved portions of the Planning Area. Therefore, future infrastructure development would occur within areas that are already served by essential roads, utilities, and public services.

	SGAG Projected (2040)	Project (2040)	Increment
Population	256,600	252,179	-3,821
Households	73,000	72,737	-263
Employment	83,200	83,246	+46

Overall, the project would exceed the state RHNA requirements, would reduce future population and household growth compared to 2040 SCAG projections, and would locate future infrastructure along major transit corridors that are already served. Therefore, the project would not induce unplanned population growth, and impacts would be less than significant.

#### **4.15.5.2 Topic 2: Displace People or Housing**

*Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

Future redevelopment within the Concept Areas that would occur under the project would have the potential to displace people and housing through demolition of existing residential structures. However, the project would exceed the state RHNA allocations assigned to the



city, providing a buffer in all income categories. This exceedance of the City's RHNA allocation would provide additional housing that would accommodate residents displaced by future redevelopment projects, and ensure no net loss of housing. Furthermore, the project would result in a reduction of future population and household growth compared to 2040 SCAG projections, which would reduce pressure on displaced residents in need of new housing. Therefore, displacement of housing and people associated with the project would not exceed the amount of housing that would be constructed under the project, and impacts would be less than significant.

### **4.14.6 Cumulative Analysis**

The study area considered for the population and housing cumulative impact analysis is defined as the region. Buildout of the project would respond to the city's allocation under RHNA and would accommodate the projected population growth in the region, consistent with adopted plans and regional growth principles. The project would exceed the City's RHNA allocation, which would provide a buffer in all income categories to ensure the City can navigate the no net loss provisions of the state Housing Element law and have continued ability to meet the RHNA by income group throughout the planning period. This exceedance of the RHNA allocation would also provide additional housing that would accommodate residents displaced by future redevelopment projects, and ensure no net loss of housing. It would also reduce pressure on residents searching for new housing. Furthermore, the project would result in a reduction of future population and household growth compared to 2040 SCAG projections. Therefore, the project would not contribute to a cumulative impact related to population and housing.

### **4.14.7 Significance of Impacts before Mitigation**

#### **4.15.7.1 Topic 1: Induce Unplanned Population Growth**

The project would exceed the state RHNA requirements, would reduce future population and household growth compared to 2040 SCAG projections, and would locate future infrastructure along major transit corridors that are already served by essential roads, utilities, and public services. Therefore, impacts would be less than significant.

#### **4.15.7.2 Topic 2: Displace People or Housing**

The project would exceed the state RHNA requirements, which would provide additional housing that would accommodate residents displaced by future redevelopment projects, and ensure no net loss of housing. Furthermore, the project would result in a reduction of future population and household growth compared to 2040 SCAG projections. Therefore, impacts would be less than significant.

## **4.14.8 Mitigation**

### **4.15.8.1 Topic 1: Induce Unplanned Population Growth**

Impacts would be less than significant. No mitigation is required.

### **4.15.8.2 Topic 2: Displace People or Housing**

Impacts would be less than significant. No mitigation is required.

## **4.14.9 Significance of Impacts after Mitigation**

### **4.15.9.1 Topic 1: Induce Unplanned Population Growth**

Impacts would be less than significant. No mitigation is required.

### **4.15.9.2 Topic 2: Displace People or Housing**

Impacts would be less than significant. No mitigation is required.

## 4.15 Public Services and Recreation

This section analyzes potentially significant impacts related to public services and recreation that could result from implementation of the project, which consists of the General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the entire city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area.

### 4.15.1 Existing Conditions

#### 4.15.1.1 Fire and Emergency Service

##### a. Service and Response

Fire and emergency medical services are provided by Moreno Valley Fire Department (MVFD), under contracts with the Riverside County Fire Department (RCFD) and the California Department of Forestry and Fire Protection (CAL FIRE) for provision of services as part of an integrated regional fire protection system. 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 also provides a full range of fire prevention services including public education, code enforcement, plan check and inspection services for new and existing construction, and fire investigation. Through a master mutual aid agreement, MVFD is obligated to provide fire apparatus to other jurisdictions in the region to assist in handling emergency calls for service, just as those jurisdictions are obligated to provide resources to the city. Additionally, the City's Office of Emergency Management is located within the MVFD allowing for a well-coordinated response to both natural and human-made disasters.

Moreno Valley is the busiest of the 30 planning areas served by CAL FIRE/RCFD. In 2018, there were 18,475 incidents in the city, almost 2 percent fewer than 2017. In the same year, the Moreno Valley Battalion responded to 19,605 total cases, the vast majority attributed to medical emergencies but 95 of which were structural fires (Dyett & Bhatia 2020a). MVFD has established a target response time of 5 minutes from dispatch to arrival for 90 percent of calls for service and continues to work to meet this goal.

## b. Staffing, Facilities, and Equipment

Figure 4.15-1 presents the locations of existing and proposed fire stations within the Planning Area. Table 4.15-1 lists the civic address of each station and the equipment housed. The MVFD has not adopted service ratios for personnel or equipment but strives to achieve National Fire Protection Association standards for the organization and deployment of fire suppression operations (NFPA 1710) and adjusts staffing and equipment levels as needed, based on an ongoing assessment of activity in the city and calls for service.

MVFD has adopted a Strategic Plan covering the period from 2012 through 2022. The Strategic Plan guides MVFD activities and outlines goals and strategies for ensuring the community receives outstanding fire protection services. The document is reviewed biennially to ensure the goals are being met. The Strategic Plan anticipates the need for twelve or thirteen fire stations and a possible fourteenth infill fire station to service projected population through 2022. The location of the eighth and ninth fire stations and one relocation are proposed in the Strategic Plan; Fire Station 65 (Kennedy Park) would be relocated slightly northwest of its current location and future development in the east and southeast would be serviced by the new Redlands Boulevard Fire Station and Industrial Station, respectively. With the development of the World Logistics Center (WLC), the construction of two new fire stations -- one with 12 total personnel and coverage of the aerial truck and one with 9 total personnel and additional fire apparatus -- is planned in the eastern portion of the city. An additional urban fire station is also planned upon completion of WLC construction, to be constructed on a 1.5-acre site dedicated by the WLC. A potential location for this urban fire station is shown on Figure 4.15-1, but may be coordinated with the provision of a new police satellite facility in the area and with development in the future Downtown Center Concept Area. Other projects, funded by the City's Capital Improvement Project (CIP) budget, include land acquisition for future fire stations and facility improvements, as shown in Table 4.15-2. The Strategic Plan also explores the feasibility of additional staffing, reassignment of personnel, division of the City into two Battalions, and acquisition or leasing of additional equipment to increase service levels, especially in anticipation of future growth.

**Table 4.15-1  
MVFD Stations, Locations, and Equipment**

Station	Location	Equipment
Station 2 – Sunnymead	24935 Hamlock Avenue	One Type 1 engine, one 100-foot Aerial Ladder Truck, one Water Resource Squad and one USAR vehicle.
Station 6 – Towngate	22250 Eucalyptus Avenue	One Type 1 engine, one Type 1 reserve engine and one Paramedic Squad.
Station 48 – Sunnymead Ranch	10511 Village Road	One Type 1 engine
Station 58 – Moreno Beach	28040 Eucalyptus Avenue	One Type 1 engine, one Type 3 engine and one Reverse squad.
Station 65 – Kennedy Park	15111 Indian Avenue	One Type 1 engine.
Station 91 – College Park	16110 Lasselle Street	One Type 1 engine and one Reserve Aerial Ladder Truck.
Station 99 – Morrison Park	13400 Morrison Street	One Type 1 engine.

SOURCE: Dyett & Bhatia 2020a.

Map Source: Dyett & Bhatia

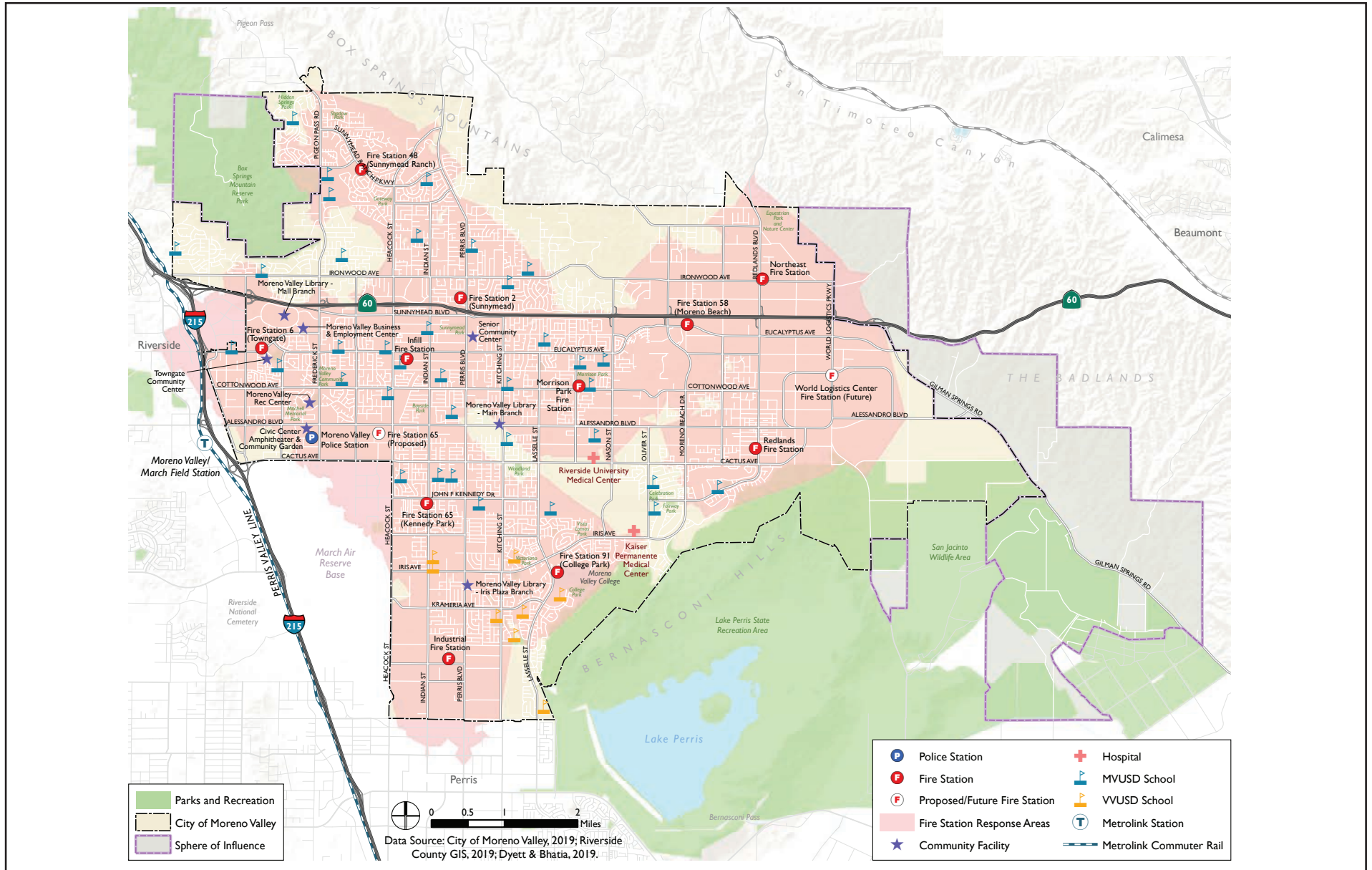


FIGURE 4.15-1  
Public Facilities

<b>Table 4.15-2 Capital Improvement Plan - Fire Department Projects</b>		
<b>Project Title</b>	<b>Description</b>	<b>Status</b>
Cottonwood Park Fire Station (Fire Station 110)	1.5-acre new facility at NE corner of Cottonwood Ave and Indian St	Design partially completed – on hold
Fire Station 65 Relocation	1.5-acre new standard 3-apparatus bay fire station at NE corner of Brodiaea Ave and Rebecca St	Design on hold - subject to availability of funds
Fire Station (Future) Land Acquisition	New facility to service future growth	Land Acquisition depending on development through 2029
Gilman Fire Station	New facility to service future growth, per development agreement in area	Land acquisition depending on development through 2029
Industrial Fire Station	2.5-acre new fire station and drill tower at NE corner of San Michele Rd and San Celeste Rd	Design on hold - subject to availability of funds
Northeast Fire Station	New facility to service future growth in northeast area	Land acquisition on hold
Redlands Boulevard Fire Station	1.5-acre new facility to service development in southeast area	Design on hold - subject to availability of funds
Remodel Fire Station 65 - Indian St and JFK Drive	Renovations for expanded use, per building code requirements	Expected start of construction within 3-5 years

SOURCE: Dyett & Bhatia 2020a.

### **c. Volunteers and Programs**

Moreno Valley Volunteer Reserve Firefighters assist the MVFD in firefighting activities and provision of Emergency Medical Services (EMS). They respond to alarms as members of fire crews and operate various fire apparatus and equipment, ensuring proper usage and maintenance. Volunteer Reserve Firefighters are also trained as Emergency Medical Technicians, First Responders, or Emergency Medical Responders (EMR) and administer varying degrees of emergency medical aid to injured people under extreme conditions involving trauma, illness, and personal tragedy (Dyett & Bhatia 2020a).

The Moreno Valley Fire Explorer Program is a youth program organized through Learning for Life and designed to allow youth between the ages of 14 and 20 to explore a career in the fire service. The explorers receive training similar to volunteer and professional firefighters, including basic fire chemistry, hose evolutions, ladder operations, medical and CPR training, hazardous materials, and auto extrication. The two Fire Explorer Posts are the West Moreno Valley Fire Explorer Post #906, located at Towngate Fire Station 6, and the East Moreno Valley Fire Explorer Post #958, located at Moreno Fire Station 58.

The CAL FIRE/RCFD Division Chief is the appointed Fire Chief of the MVFD and oversees the City's Fire Prevention Bureau and Office of Emergency Management. The Office of Emergency Management program provides a wide variety of training, such as Community Emergency Response Team (CERT) training and Terrorism Awareness, to both employees and residents. This program is also responsible for citywide prevention, mitigation, preparedness, response, and recovery for natural or man-made disasters.

### 4.15.1.2 Police Service

#### a. Service and Staffing

The Moreno Valley Police Department (MVPD) provides law enforcement services that enhance, protect, and promote the quality of life for local residents, businesses, and visitors. The City contracts with the County of Riverside for police protection services. Since incorporation, the City has maintained an annual contract with the Riverside County Sheriff's Department for police protection and crime prevention services. MVPD provides a full range of protection and prevention services, including general law enforcement, traffic enforcement, investigations, and routine support services such as communications, evidence collection, analysis and preservation, training, administration, and records keeping. MVPD also provides law enforcement services at the Riverside University Health System Medical Center and the schools within Moreno Valley Unified School District (MVUSD).

The existing 2006 General Plan established a police staffing standard of at least 1 officer per 1,000 residents, as feasible given budget constraints. MVPD currently operates five divisions as well as a Volunteer group. The five MVPD divisions include Administration, Detective, Patrol, Special Enforcement, and Traffic divisions. The Patrol Division provides first responders to crimes in progress and to calls for service assigned by dispatch. The unit contains nine supervising sergeants, 64 sworn patrol officers, three K-9 teams, and 10 non-sworn officers. MVPD has adopted a zone policing strategy whereby officers are assigned to one of four areas of the city in order to improve response times to calls for service, help officers become more familiar with the community, and build relationships with local residents and business owners.

The MVPD receives approximately 400 to 450 calls per day. Calls to the MVPD are prioritized and assigned by urgency, from greatest urgency (Priority 1) through non-emergency calls. Priority 1 calls include emergency calls which require immediate response, when vehicular pursuit is in process, or when there is reason to believe that an immediate threat to life exists. Priority 2 calls include injured persons, robberies in progress, bomb threats, car jackings, rape, and stolen vehicles. Priority 3 calls include assault, prowlers, disturbances, tampering with vehicles, and burglary alarms. The MVPD has a response target of six minutes or less for Priority 1 calls, 15 minutes or less for Priority 2 calls, and 35 minutes or less for Priority 3 calls. Table 4-15-3 below shows average actual response times for 2019.

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

## **b. Facilities and Equipment**

MVPD operates out of the Moreno Valley Station, located in the Civic Center Complex at Alessandro and Frederick, with satellite substations in several other locations throughout the city. Additionally, MVPD is increasingly making use of technology to fight crime and improve public safety. MVPD employs a citywide camera surveillance system, one of the most advanced in the region, to remotely monitor parks and other key locations, permitting MVPD to enhance public safety without adding police officers. MVPD also makes use of a computer-aided dispatch and records management system that allows rapid access to crime data, as well as digital cameras and automated license plate readers in patrol cars.

The City is planning an expansion of the Civic Center complex that would include a remodeled Public Safety Building capable of accommodating roughly 600 total personnel, as well as a satellite police substation in the southeastern part of the city to service anticipated demand from new development. Continued investment in technology and resources will allow MVPD to expand the camera system, implement advanced license reading applications, and offer video crime reporting services that allows residents to contact MVPD and interact with officers in real-time.

Design of the built environment can also help prevent crime, reduce the fear of crime, and improve the quality of life in urban areas. Research has shown that the most effective deterrent to criminal activity is the risk of being caught, and design of public spaces that places more eyes on the street and limits access points can create safer environments. Strategies for Crime Prevention Through Environmental Design (CPTED) include locating windows to overlook sidewalks and parking lots, increasing pedestrian and bicycle traffic, and selectively installing fencing, landscaping, or lighting to control access. Well-maintained buildings and grounds also signal alert, active owners and can deter criminal activity.

## **c. Volunteers and Programs**

The Administration Division oversees Community and Volunteer Services Programs, as well as the Neighborhood Watch program, and now has 81 volunteers across the Citizen's Patrol Unit, Anti-Graffiti Patrol Unit, Police Explorer Program, Reserve Officer's Program, Station Volunteers, and Mounted Posse.

The Citizen's Patrol Unit conducts uniformed patrols in marked police units to deter crime and trains volunteers in laws of arrest, traffic control, identification of gang members, crime scene management, recognition of DUI drivers, identification of graffiti, and proper radio traffic while communicating with police personnel. The Police Explorer Program is a program for youth between 14 and 20 to gain experience in the law enforcement field and foster leadership skills by assisting different units within the Police Department. Station Volunteers assist various entities at the MVPD station through duties such as filing, tracking offenders, issuing and maintaining equipment and weapons, and data management. The newly formed Mounted Posse is a volunteer-based organization serving all of Riverside County that has direct contact with the public at various functions including community patrol, safety expos, search and rescue operations, and local fairs, concerts, and parades.



These volunteer programs help connect the MVPD to the community and play an important role in ensuring the continued safety and well-being of residents.

### 4.15.1.3 Schools

#### a. Moreno Valley Unified School District

MVUSD is the third largest school district in Riverside County, serving approximately 77 square miles that includes portions of the city, a small portion of the city of Riverside, and unincorporated regions in Riverside County. As shown in Table 4.15-4, MVUSD serves Kindergarten through 12<sup>th</sup> grade across 39 existing school sites, with 32,763 students enrolled in the 2018-2019 school year (Dyett & Bhatia 2020a). Table 4.15-5 shows the student generation rates for elementary, middle, and high schools.

School Name	Enrollment (2018-19)
<b>Elementary Schools (K-5)</b>	<b>14,964</b>
Armada Elementary	857
Bear Valley Elementary	839
Box Springs Elementary	449
Butterfield Elementary	892
Chaparral Hills Elementary	663
Cloverdale Elementary	723
Creekside Elementary	502
Edgemont Elementary	663
Hendrick Ranch Elementary	639
Hidden Springs Elementary	565
Honey Hollow Elementary	620
La Jolla Elementary	740
Midland Elementary	646
Moreno Elementary	483
North Ridge Elementary	747
Ramona Elementary	658
Ridge Crest Elementary	601
Seneca Elementary	456
Serrano Elementary	520
Sugar Hill Elementary	543
Sunnymead Elementary	794
Sunnymeadows Elementary	625
Towngate Elementary	739
<b>Middle Schools (6-8)</b>	<b>7,765</b>
Badger Springs Middle	1,186
Landmark Middle	1,160
Mountain View Middle	1,338
Palm Middle	1,245
Sunnymead Middle	1,505
Vista Heights Middle	1,331

School Name	Enrollment (2018-19)
<b>High Schools (9-12)</b>	<b>9,191</b>
Canyon Springs High	2,173
Moreno Valley High	2,327
Valley View High	2,573
Vista del Lago High	2,118
<b>Continuation and Alternative Schools</b>	
Alessandro School (SDC K-12)	50
Bayside Community Day (9-12)	135
March Mountain (9-12)	334
March Valley (Independent Study 1-8 and Core 9-12)	87
Moreno Valley Community Learning Center (Charter School, 6-12)	27

SOURCE: Dyett & Bhatia 2020a.

Unmitigated Future Dwelling Units <sup>1</sup>	School Type	Student Generation Rate	Students Generated
17,099	Elementary	0.3314	5,667
17,099	Middle	0.1702	2,910
17,099	High	0.2281	3,900
<b>Overall</b>		<b>0.7297</b>	<b>12,477</b>

<sup>1</sup>As estimated in the Moreno Valley Unified School District Fee Justification Report 2012.  
SOURCE: Dyett & Bhatia 2020a.

The 23 elementary schools in MVUSD are set up in a Kindergarten to 5th grade configuration, with curricula following State Content Standards. Elementary school facilities vary widely in age and condition but are designed to adequately deliver necessary programs and MVUSD standards. There are six middle schools for students in grades 6 to 8 which facilities that are enhanced with teaching stations such as science labs, comprehensive physical education facilities, and larger administrative and ancillary spaces. High schools in the MVUSD serve 9th to 12th grade in various settings including comprehensive high schools, a continuation school, a community day school, an alternative school, and a charter school. Facilities for these programs vary according to the specific requirements of each curriculum, but some facilities are in need of improvement or relocation (Dyett & Bhatia 2020a).

### ***MVUSD School Facilities and Funding***

Between 2000 and 2012, MVUSD experienced an annual growth rate of 200-1000 pupils. In anticipation of continuing growth, the MVUSD has constructed seven new schools since 2002 and installed over 230 portable classrooms to increase elementary, middle, and high school capacities. However, placement of portable classrooms reduces field and hard-court areas on school sites, and the MVUSD's most recent update to their Facilities Master Plan includes recommendations to replace these structures with permanent buildings to house future students generated by expected development within MVUSD boundaries. MVUSD projected an increase of 12,477 students between 2012 and 2035, based on the projected 17,099 additional

housing units anticipated to be built during that period, multiplied by the Student Generation Rates summarized in Table 4.15-6 (Dyett & Bhatia 2020a).

Since 2009, enrollment at MVUSD schools has decreased by 11 percent overall, or approximately 1 to 2 percent annually, as shown in Table 4.15-6. This means that the MVUSD is able to rely less on portable classrooms and house more students in conventional school buildings. The MVUSD is in the process of building a new elementary school facility at the intersection of Nason Street and Bay Avenue with a capacity for 800 students, and an additional high school is also envisioned in the facilities master plan, anticipated to serve growing needs in the northeastern area of the city in the next 20 years. Other planned facility projects include additions and relocation of services at Creekside Elementary to better facilitate campus safety, wellness, and security, as well as renovation of the existing Rainbow Springs pre-school and location of a wellness center on the campus. The wellness center will provide access to direct and indirect services for students and their families through community partnerships. Services to be provided include focused attention and services to homeless and foster youth students; parent classes for self-efficacy, health, literacy and nutrition; resources for basic needs such as clothing, shoes, transportation and food; family outreach and support through case management; and health service referrals for access to physical dental, immunizations and health insurance.

In addition, in 2014 Measure M was passed, providing \$398 million in bond funding for facilities construction and maintenance. Measure M funds further projects proposed and undertaken pursuant to a prior bond measure, Measure A, passed in 2004 to repair and update Moreno Valley schools.

The MVUSD has also sought funding from other sources including the State Office of Public School Construction (OPSC) School Facility Program (SFP), the OPSC Emergency Repair Program (ERP), and the Federal Qualified Zone Academy Bond (QZAB) program. Revenue from development fees also contribute to the school district budget, including School Impact Fees, as allowed by the School Facilities Act of 1986 and Senate Bill 50, in addition to Community Facility District (CFD) or Improvement/Redevelopment Zone fees. These sources of funding allow the MVUSD to continue to maintain and improve the quality of their facilities and services.

<b>Table 4.15-6 Public School District Enrollment Trends</b>										
Grades Served	Enrollment									
	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
<b>Moreno Valley Unified School District</b>										
K to 5	16,788	16,625	16,276	16,070	16,026	15,837	15,759	15,458	15,138	15,000
6 to 8	8,446	8,383	8,371	8,183	8,039	7,860	7,844	7,900	7,927	7,829
9 to 12	11,575	11,607	11,043	10,671	10,401	10,471	10,284	9,994	10,015	9,934
<i>Subtotal</i>	<i>36,809</i>	<i>36,615</i>	<i>35,690</i>	<i>34,924</i>	<i>34,466</i>	<i>34,168</i>	<i>33,887</i>	<i>33,352</i>	<i>33,080</i>	<i>32,763</i>
<b>Val Verde Unified School District</b>										
K to 5	9,020	9,060	9,079	9,197	9,144	9,182	9,137	8,959	8,863	8,680
6 to 8	4,518	4,503	4,504	4,574	4,611	4,593	4,625	4,653	4,811	4,844
9 to 12	6,098	6,124	6,030	6,033	6,013	6,039	6,067	6,299	6,519	6,617
<i>Subtotal</i>	<i>19,636</i>	<i>19,687</i>	<i>19,613</i>	<i>19,804</i>	<i>19,768</i>	<i>19,814</i>	<i>19,829</i>	<i>19,911</i>	<i>20,193</i>	<i>20,141</i>
<b>TOTAL</b>	<b>56,445</b>	<b>56,302</b>	<b>55,303</b>	<b>54,728</b>	<b>54,234</b>	<b>53,982</b>	<b>53,716</b>	<b>53,236</b>	<b>53,273</b>	<b>52,904</b>

SOURCE: Dyett & Bhatia 2020a.

## b. Val Verde Unified School District

Val Verde Unified School District (VVUSD) also serves part of the Planning Area, as well as the cities of Perris and Mead Valley. There are 23 schools in the VVUSD, with a total of 20,141 students enrolled during the 2018-2019 school year. Of these schools, four elementary schools, two middle schools, and one high school are located in the Planning Area. Table 4.15-7 presents enrollment for these schools located within the Planning Area.

Like its neighboring district, VVUSD has experienced a decline in enrollment over the past decade (see Table 4.15-6 above). This includes a 6.3 percent overall decrease, or generally a 1 percent annual change between 2009 and 2019 attributable to a shift in the demographic makeup of VVUSD's population. However, in 2018, VVUSD conducted a School Facilities Needs Analysis and determined that 2,330 additional students would be generated by residential development anticipated to occur in the VVUSD through 2023, which growth would result in a projected 805 unhoused students. Facilities capacity in 2018 was 22,016 seats, and though enrollment for the 2018-2019 school year does not yet provide a capacity challenge, an addition of 2,330 students may require additional facilities in the VVUSD (VVUSD 2018). VVUSD is in the process of updating its facilities master plan, but the need for a new middle school located in Perris and the reopening of an elementary school near the border of Perris and Moreno Valley where the VVUSD has historically seen the most school growth, is anticipated to meet future need. Another priority of the VVUSD is bolstering campus security, and the VVUSD has created its own police department, with the intention of eliminating external issues to allow more emphasis on education.

School Name	Enrollment (2018-19)
<b>Elementary Schools (K-5)</b>	<b>3,073</b>
Lasselle Elementary	836
Mary McLeod Bethune Elementary	616
Rainbow Ridge Elementary	777
Victoriano Elementary	844
<b>Middle Schools (6-8)</b>	<b>1,747</b>
March Middle	775
Vista Verde Middle	972
<b>High Schools (9-12)</b>	<b>2,074</b>
Rancho Verde High <sup>1</sup>	2,074

SOURCE: Dyett & Bhatia 2020a.

### ***Facilities and Funding***

VVUSD collects impact fees from new residential and commercial/industrial development that funds the construction or expansion of additional school facilities, maintenance and improvement of existing facilities, and installation of additional portable classrooms. The most recent project financed by these fees was the construction of new kindergarten buildings at Mead Valley Elementary in 2012. Other anticipated projects include modernization of Rancho Verde High School, which is located in the city (Dyett & Bhatia 2020a).

Bond Measure L, passed in 2012, provided \$178 million to upgrade instructional technology; provide facilities and equipment for career and technical education classes; improve energy efficiency; upgrade electrical systems, fire alarms, and school security; and construct new classrooms and schools. The new Orange Vista High School, opened in 2015, was a result of these bond projects and has since also added a new football stadium to its facilities.

### **c. Moreno Valley College**

Post-secondary education is offered at Moreno Valley College (MVC), well-known for programs in business and information technology systems; health, human, and public services; and public safety education and training. MVC offers 54 academic programs for more than 10,000 enrolled students each semester and employs more than 585 people. Additionally, MVC has the iMAKE Innovation Center, a facility that provides students and the broader community with access to innovation equipment and material to develop entrepreneurial skills. The campus consists of two locations; the main campus is located in the city at 16130 Lasselle Street and the off-campus Ben Clark Training Center is located approximately 11 miles from the main campus.

The MVC Facilities Master Plan was updated in June 2019 and encompasses goals to provide additional services and adequate facilities for expanded programs, including satellite spaces in future academic buildings, larger classrooms and instructional labs to accommodate academic tutoring or support spaces directly within or adjacent to the classroom, and location of primary support resources in the new Library Learning Resource Center. A space needs analysis was also conducted to gauge physical space growth in relation to enrollment trends and found that MVC will be at 120 percent capacity load in 2030, with greatest need for student space, physical education/athletics space, and instructional labs. Numerous space changes are anticipated between 2018 and 2027 as outlined in the Facilities Master Plan.

#### **4.15.1.4 Parks/Recreational Facilities**

The City's Parks and Community Services Department maintains approximately 482 acres of parkland within the Planning Area, which consists of seven community parks, 24 neighborhood parks, four specialty parks and 15 miles of trails/greenways existing and proposed park and recreational facilities are presented in Table 4.15-8 and Figure 4.15-2. These facilities offer a variety of amenities from ball fields, basketball courts, and playgrounds to picnic tables, barbecues, and a demonstration garden that showcases sustainable gardening and landscaping practices. Additionally, the City maintains joint use agreements with the MVUSD and VVUSD for off-hour use of some school facilities, including gymnasiums and swimming pools. Residents also have access to an extensive array of regional parks and open spaces in the surrounding area, including Box Springs Mountain Reserve Park, Norton Younglove Reserve, the San Jacinto Wildlife Area, and the Lake Perris State Recreation Area. For planning purposes, parks are classified by type based on the size, use, and physical characteristics of the land. The four categories of parks defined by the City are as follows:

- Community Parks are larger parks providing community-wide amenities, meeting needs of large sections of the community. Ideally about 20 to 50 acres in size, these parks have a three-mile radius service area, which represents a 20-minute drive, and often include community buildings, such as a cultural center or teen center, as well as specialty sports facilities. Where Community Parks are located in residential neighborhoods, they serve both the needs of the Community Park service radius and the Neighborhood Park service radius.
- Neighborhood Parks range from ¼ to 20 acres in size and are geared specifically for those living within a ¾-mile radius of the park, which represents a 15-minute walk. Ease of access and walking distance are critical factors in locating a Neighborhood Park. Amenities provided by a Neighborhood Park include practice sports fields, informal open play areas, children’s play apparatus, and basketball, tennis, and volleyball courts. Mini Neighborhood Parks are the smallest park classification, ranging in size from ¼ to five acres in size, and are best used to meet limited or specialized recreational needs.
- Specialty Parks provide a single use or activity and generally possess a unique character or function such as equestrian centers, dog parks, skate parks, demonstration gardens, community buildings, aquatic centers, and sport complexes.
- Trails/Greenways allow for uninterrupted, safe pedestrian movement through the city and play an important role in connecting the park, recreation and open space system. There are two main categories of greenways: “Natural” greenways follow existing natural resources; “man-made” greenways result from development projects and are often located in residential subdivisions or along abandoned rail corridors, power line corridors, storm drain easements and collector parkway rights-of-way.

The City also has an existing Multiple-Use Trail System that consists of approximately 15 miles of trails constructed or improved in the city, primarily located in the northwest near Sunnymead Ranch and in the hills in the southern portion of the city bordering the Lake Perris State Recreation Area (see Figure 4.15-2). The multi-use trails accommodate pedestrians, bicyclists, and equestrians, and provides connections to both regional and state trail systems, as well as six equestrian staging areas.

Park/Facility Name	Acres	Amenities
<b>Existing Parks and Recreational Facilities</b>		
<b>Community Parks</b>	<b>166.25</b>	
El Potrero Park	15.00	Barbecues, four multi-use athletic fields, fitness equipment, picnic tables, playground, soccer field
Lasselle Sports Park Complex	12.75	Barbecues, lit football field, picnic tables, playground, snack bar, lit tennis court
March Field Park (Valley Skate Park)	85.32	Picnic tables, lit skate park, snack bar, lit soccer turf arena, two lit softball/baseball fields
Moreno Valley Community Park	15.58	Barbecues, picnic tables, playground, skate park, snack bar, four lit soccer fields
Morrison Park	14.01	Barbecues, picnic tables, soccer field, snack bar, four lit softball/baseball fields

<b>Table 4.15-8 Existing and Planned Parks and Recreation Facilities</b>		
<b>Park/Facility Name</b>	<b>Acres</b>	<b>Amenities</b>
Sunnymead Park	15.53	Barbecues, picnic tables, playground, snack bar, four lit softball/baseball fields
Towngate Memorial Park	8.06	Barbecues, multi-use athletic fields, picnic tables, playground, lit softball/baseball field, walking path
<b>Neighborhood Parks</b>	<b>155.58</b>	
Adrienne Mitchell Memorial Park	4.43	Four lit basketball courts, barbecues, horseshoes, picnic tables, playground, walking path
Bayside Park	2.04	Barbecues, lit basketball court, horseshoes, picnic tables, playground
Bethune Park	6.00	Barbecues, picnic tables, playground, snack bar, two softball/baseball fields, two lit tennis courts, water feature
Celebration Park	6.65	Barbecues, lit basketball court, picnic tables, playground, walking path, water feature
Civic Center Park	7.00	Outdoor amphitheater, benches (adjacent to Conference and Recreation Center)
College Park	18.00	Playground, soccer field
Fairway Park	5.50	Barbecues, multi-use athletic field, picnic tables, playground, volleyball court
Gateway Park	7.67	Barbecues, picnic tables, playground
Hidden Springs Park	7.00	Barbecues, multi-purpose trail/trailhead, picnic tables, playground
Hidden Springs Passive Nature Park	17.00	Picnic tables, trailhead, trail
John F. Kennedy Memorial Park	7.69	Barbecues, picnic tables, playground, lit baseball/softball field, four lit tennis courts
Parque Amistad	4.24	Barbecues, lit basketball court, lit multi-use athletic field, picnic tables, playground
Patriot Park	0.50	Picnic tables, playground, walking path
Pedrorena Park	5.50	Barbecues, lit basketball court, multi-use athletic fields, picnic tables, playground, four tennis courts
Ridge Crest Park	5.00	Barbecues, lit multi-use athletic fields, picnic tables, playground
Rock Ridge Park	1.93	Barbecues, picnic tables, playground
Santiago Park	2.84	Fitness area, multi-use field, playground, shade shelters, walking path
Shadow Mountain Park	10.00	Barbecues, picnic tables, two lit softball/baseball fields
Towngate II Park	8.91	Banquet facility, barbecues, picnic tables, playground, walking path
Victoriano Park	5.43	Barbecues, lit multi-use athletic fields, picnic tables
Vista Lomas Park	4.00	Barbecues, lit basketball court, picnic tables, playground
Westbluff Park	5.00	Barbecues, picnic tables, playground, walking path
Weston Park	4.14	Barbecues, lit multi-use athletic fields, picnic tables, playground, lit softball/baseball fields
Woodland Park	9.11	Barbecues, four lit basketball courts, pickleball court, picnic tables, playground, lit softball/baseball fields, four lit tennis courts
<b>Specialty Parks</b>	<b>61.04</b>	
Civic Center Demonstration Garden	0.21	Raised planters, instruction area, compost bins, fruit trees, vertical planters
Cottonwood Golf Center	15.83	Banquet facilities, golf course
Hound Town Dog Park	1.00	Dog park
Moreno Valley Equestrian Park	44.00	Horse arenas, multi-purpose trails
Trails/Greenways <sup>1</sup>	90.86	
Juan Bautista Trail	29.61	

<b>Table 4.15-8 Existing and Planned Parks and Recreation Facilities</b>		
<b>Park/Facility Name</b>	<b>Acres</b>	<b>Amenities</b>
Multi-Use/Equestrian Trails <sup>2</sup>	61.25	Including: Auto Mall Trail; Cactus Corridor Trail; Cold Creek Trail; Cottonwood Trail; Covey Ranch/Day Break Trail; Eucalyptus Ave. Trail; Iris Ave. Trail; Quincy Channel Trail; Rancho Verde Trail; Redlands Blvd. Trail; Sunnymead Ranch Trail
Trails Heads/Staging Areas	7.84	
Cold Creek Trail Head	0.64	
Cottonwood Staging Area	0.40	
Rancho Verde Equestrian Staging Area	1.30	
Sunnymead Ranch Trail Head	5.50	
Subtotal	481.57	
Current acres of parks/facilities per 1,000 residents (2018) <sup>3</sup>	2.35	
<b>Planned Parks, Open Space, and Recreational Facilities</b>		
Subtotal	194.20	
College Park	7.00	
Markborough Property	43.17	
Morrison Property	8.09	
Poorman's Reservoir	125.00	
Rancho Verde Park	3.44	
Redlands Property	6.00	
Sunnymead Ranch Linear Park	1.50	
<b>Existing and Planned Parks, Open Space, and Recreational Facilities Combined</b>		
Total	675.77	
Existing and planned acres of parks/facilities per 1,000 residents <sup>4</sup>	2.68	
<b>Additional Parks/Facilities Land Needed</b>		
Additional Parks/Facilities	80.77	
<b>Total Existing and Planned and Additional Parks and Recreational Facilities</b>		
<b>TOTAL</b>	<b>756.54</b>	
<sup>1</sup> Trails/Greenways includes multiple segments per trail.		
<sup>2</sup> The 61.25 acres of Multi-Use/Equestrian Trails includes 15 miles from the Master Plan of Trails network.		
<sup>3</sup> Assumes a 2018 population of 205,034 people (U.S. Census Bureau, 2018 American Community Survey 5-Year Estimates).		
<sup>4</sup> Assumes a 2040 population of 252,179 people.		



Map Source: Dyett & Bhatia

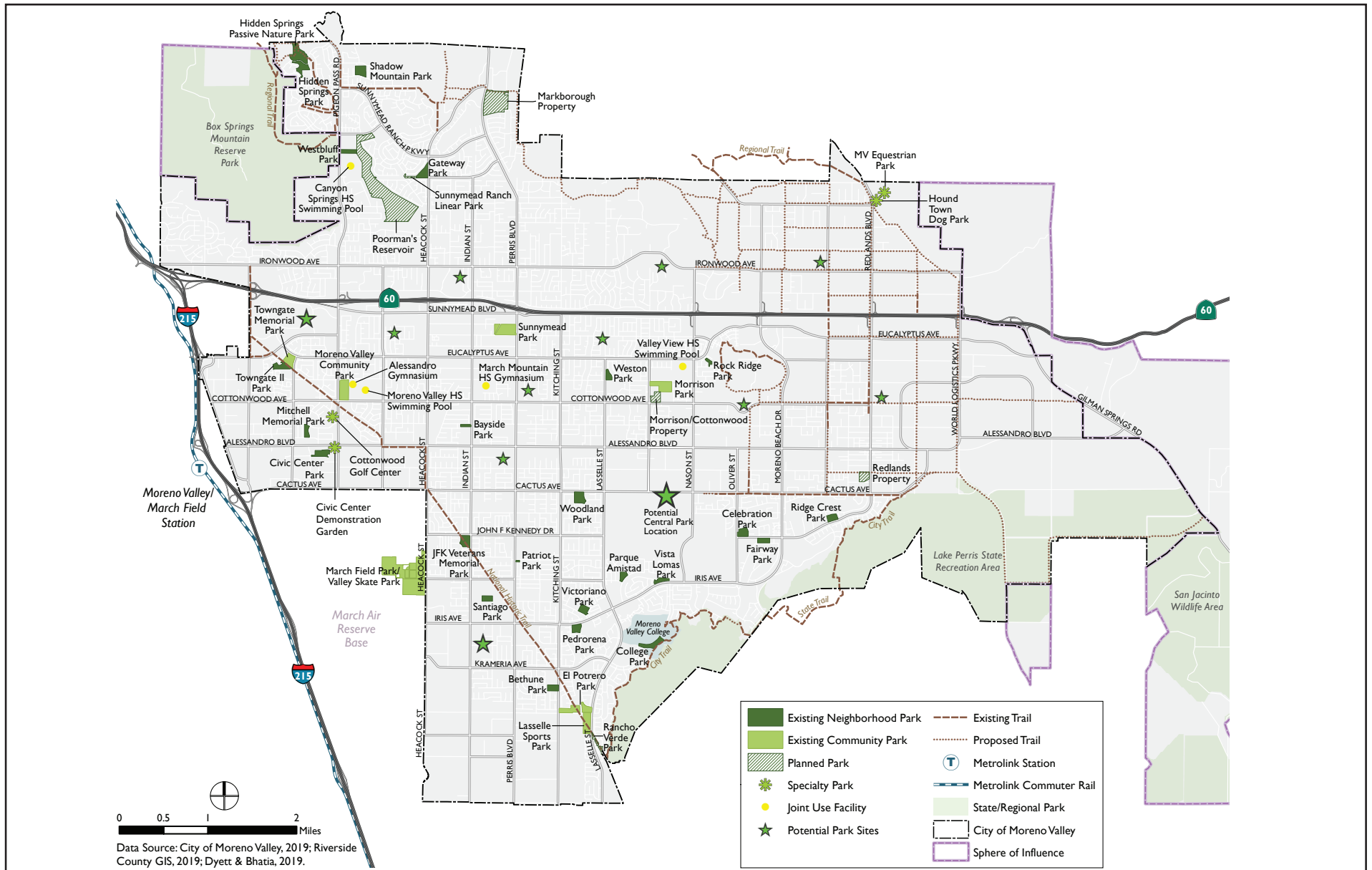


FIGURE 4.15-2

Existing and Planned Parks and Recreation Facilities

### **4.15.1.5 Libraries**

The Moreno Valley Public Library provides services and programs furthering educational development and cultural vitality of patrons of all ages and backgrounds in the Moreno Valley area. The library has three branch locations as shown in Figure 4-15-1. The Main Branch facility is located on the old Midland Middle School site, reconstructed in 1987 to house the library as well as a senior and community center. The library has since grown to occupy the entire 16,000-square-foot building. The Mall branch satellite location, opened in 2017, is located at 22500 Town Circle. The Iris Plaza Branch, opened in 2020, is located at 16170 Perris Boulevard. The three public libraries offer a wide array of books and technological resources that are suited to serve patrons of all ages, supporting a culture of learning and civic involvement. Moreno Valley Public Library offers a host of programs for local residents, including children's story time, book club in a bag, reading programs, and literacy programs. Additionally, the Library partners with local organizations to host activities such as monthly performing arts programs and displays local art, all events and activities of which are free.

## **4.15.2 Applicable Regulatory Requirements**

### **4.15.2.1 State**

#### **a. California Fire Code**

The 2016 California Fire Code (California Code of Regulations Title 24, Part 9) establishes regulations to safeguard against the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The Fire Code also establishes requirements intended to provide safety for and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout California. The Fire Code includes regulations regarding fire-resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire services features such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface areas. The City has adopted the California Fire Code as Title 8, Chapter 8.36 the Municipal Code, including appendices addressing fire-flow requirements for buildings.

#### **b. Assembly Bill 2926**

Assembly Bill (AB) 2926, passed in 1986, allows school districts to collect impact fees from developers of new residential and commercial/industrial building space to assist in providing school facilities for students. Development impact fees (DIFs) are also referenced in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of costs for construction, modernization, and reconstruction projects.

### **c. Senate Bill 50 (Statutes of 1998), State School Funding, Education Code Section 17620**

Senate Bill (SB) 50, adopted in 1998, limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development. It also authorizes school districts to levy statutory developer fees at levels higher than previously allowed and according to new rules. California Education Code 17620 establishes the authority of any school district to levy a fee, charge, dedication, or other requirements against any development within the school district for the purposes of funding the construction of school facilities, as long as the district can show justification for the fees.

#### **4.15.2.2 Local**

##### **a. Moreno Valley Fire Department Strategic Plan**

As described in Section 4.15.1.1.b above, MVFD has adopted a Strategic Plan covering the period from 2012 through 2022. The Strategic Plan guides MVFD activities and outlines goals and strategies for ensuring the community receives outstanding fire protection services. The document is reviewed biennially to ensure the goals are being met.

##### **b. Parks, Recreation and Open Space Comprehensive Master Plan**

The Parks, Recreation and Open Space Comprehensive Master Plan acts as Moreno Valley's primary implementing tool for parks planning, bridging the City's General Plan and CIP. The master plan provides a detailed inventory of the city's existing parks and recreational facilities and future needs, as well as guidelines for the development of future facilities and potential funding sources. Moreno Valley's parkland dedication ordinance operates under the umbrella of the State of California's 1975 Quimby Act, which allows cities to require that new development dedicate land or pay fees to help ensure sufficient parkland to meet the established standard of three acres per thousand residents. Additionally, the City can explore other strategies to encourage the provision of parks and recreational facilities, such as public-private partnerships or impact bonds, which shift financial burden and risk from local government to a new investor, who provides up-front capital for a project. In these arrangements, performance metrics or outcomes are agreed up front, and when they are achieved the investor received repayment with interest.

### **4.15.3 Methodologies for Determining Impacts**

The potential for significant impacts associated with the proposed GPU has been determined based upon review of existing secondary source information cited above and the applicable General Plan standards relative to the provisions of public services (police, fire and emergency service, schools, and libraries in the city.

## 4.15.4 Basis for Determining Significance

Thresholds used to evaluate impacts to public services and recreation are based on applicable criteria in the CEQA Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact would occur if the project would:

- 1) 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;
  - ii. Police Protection;
  - iii. Schools;
  - iv. Parks/Recreational Facilities; or
  - v. Other Public Facilities;
- 2) 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; or
- 3) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

## 4.15.5 Impact Analysis

### 4.15.5.1 Topic 1: Public Services

*Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

- i. Fire Protection;*
- ii. Police Protection;*
- iii. Schools;*
- iv. Parks/Recreational Facilities; or*
- v. Other Public Facilities?*

#### **a. Fire Protection**

Project buildout would generate approximately 43,882 new residents within the Planning Area by 2040, which would necessitate construction of additional fire stations. As described in Section 4.15.1.1.a above, the MVFD Strategic Plan has identified potential locations of future fire stations within the Planning Area. However, future development under the project would be required to pay a DIF that would be used exclusively for future facility improvements necessary to ensure contribution of its fair share of the cost of facilities and

equipment. Payment of the DIF would allow future site-specific development to contribute to its fair share cost of facilities and equipment due to the increased demand for fire protection services. Additionally, the 2021 GPU includes the following goals, policies, and actions related to fire protection.

### ***Goal***

PPS-3: Provide for responsive police and fire services that ensure a safe and secure environment for people and property.

### ***Policies***

PPS.3-1 Provide responsive, efficient, and effective police services that promote a high level of public safety.

PPS.3-2 Provide fire prevention and emergency response services that minimize fire risks and protect life and property, including fire prevention, fire-related law enforcement, and public education and information programs.

PPS.3-3 Locate and maintain police and fire equipment, facilities, and staffing at locations and levels that allow for effective service delivery.

PPS.3-4 Maintain mutual aid agreements and communication links with the County of Riverside and other surrounding jurisdictions that allow for supplemental aid from other police and fire personnel in the event of emergencies.

PPS.3-5 Monitor the pace and location of development in Moreno Valley and coordinate the timing of fire station construction or expansion to the rise of service demand in surrounding areas.

PPS.3-6 Continue to require that new development make a fair share funding contribution to ensure the provision of adequate police and fire services.

PPS.3-7 Continue to engage the Police and Fire Departments in the development review process to ensure that projects are designed and operated in a manner that minimizes the potential for criminal activity and fire hazards and maximizes the potential for responsive police and fire services.

PPS.3-8 Apply Crime Prevention through Environmental Design principles in the design of new development and encourage the provision of adequate public lighting; windows overlooking streets or parking lots; and paths to increase pedestrian activity within private development projects and public facilities in order to enhance public safety and reduce calls for service.

PPS.3-9 Employ community-based policing strategies and encourage the establishment of neighborhood watch programs in partnerships with community groups.

PPS.3-10 Continue to provide community programs, volunteer opportunities, and fire safety education to residents of appropriate age.

**Actions**

- PPS.3-A Explore new Moreno Valley Police Department volunteer programs and initiatives that continue to strengthen community policing.
- PPS.3-B Explore new technology to maintain and enhance public safety including increase citywide camera system.
- PPS.3-C Periodically review and update the Fire Department Strategic Plan as conditions warrant.

Construction of future fire protection facilities could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future fire protection facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new fire protection facilities. Furthermore, these future fire protection facilities would be subject to 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this environmental impact report (EIR), which would reduce impacts associated with the provision of new or physically altered fire protection facilities to a level less than significant.

**b. Police Protection**

Project buildout would generate approximately 43,882 new residents within the Planning Area by 2040. As described in Section 4.15.1.1.b above, the City is planning an expansion of the Civic Center complex that would include a remodeled Public Safety Building capable of accommodating roughly 600 total personnel, as well as a satellite police substation in the southeastern part of the city to service anticipated demand from new development. These two additional facilities would provide space necessary for additional staffing to provide police protection services under project buildout. Future development would be subject to the payment of a DIF that would be used exclusively for future facility improvements necessary to ensure contribution of its fair share of the cost of facilities and equipment determined to be necessary to adequately accommodate new development in the City. Payment of the DIF would allow future site-specific development to contribute to its fair share cost of facilities and equipment due to the increased demand for police protection facilities. Additionally, the 2021 GPU includes goals, policies, and actions related to police protection that are described above.

Construction of future police protection facilities could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future police protection facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new police stations. Furthermore, these future police protection facilities would be subject to 2021 GPU goals and policies intended

to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the provision of new or physically altered police facilities to a level less than significant.

### **c. Schools**

As described in Section 4.15.1.3 above, MVUSD, VVUSD, and MVC have all identified the need to construct additional schools to meet future enrollment demand. Given that the project buildout horizon year of 2040 exceeds the anticipated growth projections for MVUSD and VVUSD, the project may require additional school facilities that currently anticipated by both districts.

#### ***Goal***

PPS-2: Locate, design, and program public facilities as contributors to neighborhood quality of life.

#### ***Policies***

PPS.2-1 Provide community centers, arts/cultural facilities, senior centers and other public facilities and programs, ensuring the facilities are distributed equitably and conveniently throughout Moreno Valley and the programs are accessible to all residents.

PPS.2-2 Encourage privately operated and community-based recreation opportunities, such as climbing gyms, fitness centers, yoga studios, dance schools and other hobby-oriented businesses.

PPS.2-3 Whenever feasible, co-locate City facilities with other public facilities (schools, post offices, hospitals/clinics) so that multiple services may be delivered from a single location.

PPS.2-4 Collaborate with schools to facilitate the shared use of sports and recreational facilities through continued/expanded Joint Use Agreements or other vehicles.

PPS.2-5 Partner with public and private entities to provide community services that support families and meet the diverse needs of community members of all ages, backgrounds, and interests.

#### ***Actions***

PPS.2-A Continue to promote community health and active living through City-sponsored initiatives, events, and activities (Healthy MoVal, Community Demonstration Garden).

PPS.2-B Pursue funding from public, private, or philanthropic sources to expand community facilities, parks, trails, and programs to better serve the needs of Moreno Valley residents.

- PPS.2-C Develop partnerships with businesses, community organizations, and non-profits to supplement and sponsor City programs and events.
- PPS.2-D Raise awareness of facilities and programs currently offered by the City and work with residents and stakeholders to identify additional facilities and programs that respond to evolving needs.
- PPS.2-E Promote community health and active living through City-sponsored initiatives, events, and activities.

Construction of future schools could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future schools are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new schools. Furthermore, these future schools would be subject to 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the provision of new or physically altered schools to a level less than significant.

#### **d. Other Public Facilities**

Future development would be subject to the payment of a DIF that would be used exclusively for future facility improvements necessary to ensure contribution of its fair share of the cost of facilities, including libraries. Payment of the DIF would allow future site-specific development to contribute to its fair share cost of facilities and equipment due to the increased demand for libraries. Additionally, the 2021 GPU includes goals, policies, and actions related to libraries that are described above.

Construction of future libraries could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future libraries are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new libraries. Furthermore, these future libraries would be subject to 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the provision of new or physically altered libraries to a level less than significant.

#### **4.15.5.2 Topics 2 and 3: Parks and Recreational Facilities**

*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?*

*Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*



The City has established a park service standard of 3.0 acres of parkland per 1,000 residents to ensure that access to parks is adequate and commensurate with the size of the community. With 675.77 acres of existing and planned parkland, Moreno Valley currently has 2.68 acres per thousand residents, below the established service ratio. However, the City owns 67.7 acres of land planned for new parks, including the Markborough (43.17 acres) and Redlands (6.00 acres) properties, College Park undeveloped area (7.00 acres, dependent upon joint use agreement with Moreno Valley College), Morrison property undeveloped area (8.09 acres) and Rancho Verde Park (3.44 acres). Development of these facilities would provide new recreational open space to satisfy future demand. However, the City is projected to have a population of over 252,000 in 2040, which would necessitate development of an additional 80.77 acres of parkland to meet the established standard. Figure 4.15-2 identifies potential locations for these new facilities, adjacent to areas where new housing is envisioned. New residential developments would be required to dedicate land for new park facilities or pay a fee that can be used for acquisition of parkland as needed to meet the community-wide standard.

While the amount of parkland is an essential consideration in planning for parks and recreational facilities, the quality and accessibility of these spaces is equally important. A city should have parks with a distribution and form that allows the facilities to serve as a point of focus for residential neighborhoods, easily accessible for children, families and seniors from their homes whether they choose to walk, ride, roll or take transit. As shown in Figure 4.15-3, all residential areas of the city are within three miles of a community park and most residential areas are within a 3/4-mile distance of a neighborhood park. However, given the large block size in the city and intervening development, only about a quarter of all residential neighborhoods are within a 5- to 10-minute walk of a park. The provision of new parks at the generalized locations shown on Figure 4.15-2 would help ensure easy access for future residents, and the development of a new Central Park in the Downtown Center with passive and active amenities would provide a signature facility for the community.

The City's Master Plan of Trails envisions expansion of the system into a 56-mile network of City trails that would connect Box Springs Mountain Regional Park with the Lake Perris State Recreation area through the northern and eastern portions of the city. As a condition of project approval for new development on parcels where the Master Plan shows a trail, the City would require trail construction consistent with adopted engineering standards. The network would be completed as development occurs and funding becomes available. The City has also established Beautify MoVal, a program, which allows any private organization, business, non-profit, civic group, or individual resident to take an active role in adopting and maintaining the trail system in Moreno Valley.

Future development would be subject to the payment of a DIF that would be used exclusively for future facility improvements necessary to ensure contribution of its fair share of the cost of facilities, including parks. Payment of the DIF would allow future site-specific development to contribute to its fair share cost of facilities and equipment due to the increased demand for park services. Additionally, the 2021 GPU includes the following goals, policies, and actions related to parks and recreation.

Map Source: Dyett & Bhatia

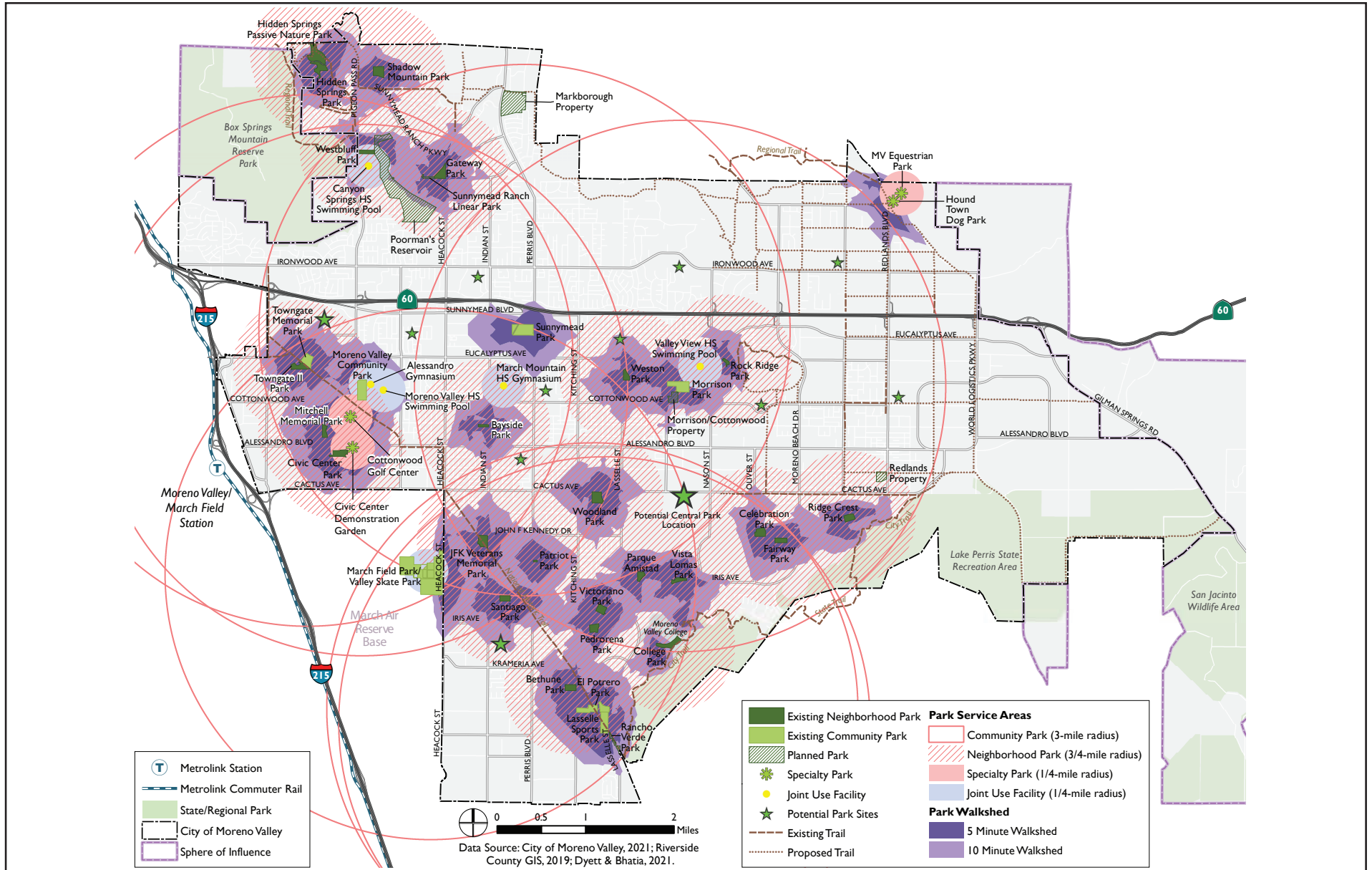


FIGURE 4.15-3  
Park Service Areas

**Goal**

PPS-1 Provide and maintain a comprehensive system of quality parks, multi-use trails, and recreational facilities to meet the needs of Moreno Valley's current and future population.

**Policies**

PPS.1-1 Increase the acreage of parks in Moreno Valley to serve the needs of the growing population and maintain a standard of three acres of parkland per 1,000 residents.

PPS.1-2 Require that proponents of new development projects contribute to the acquisition and development of adequate parks and recreational facilities within the community, either through the dedication of park land or the payment of in-lieu fees.

PPS.1-3 Locate new parks in the generalized locations shown on Map PPS-1 so that all residents have easy access to a park from their home. New parks should be located outside of the 65dbL noise contour (see Map N-3) and be accessible by transit.

PPS.1-4 Design and construct parks, public spaces and recreational facilities for flexible use, energy efficiency, adaptability over time, and ease of maintenance.

PPS.1-5 Use site design, landscaping, lighting, and traffic calming measures to create safe parks and open spaces integrated with adjacent developments.

PPS.1-6 Prioritize the maintenance and, where feasible, improvement of parks and recreational facilities to ensure safe, attractive facilities that are responsive to community needs.

PPS.1-7 Provide on-going opportunities for public involvement and input into the park planning process, including priorities for amenities, facilities, programming, and improvements.

PPS.1-8 Continue to encourage existing volunteer, service club and community group efforts to maintain and improve parks, such as "Beautify MoVal."

PPS.1-9 Design and construct the multi-use trail network to connect parks, plazas, and open spaces within the community and promote access to these spaces.

**Actions**

PPS.1-A Prioritize the creation of a Central Park facility in the Downtown Center large enough to serve as an amenity and a focal point for the whole community and a draw for visitors from the wider region.

PPS.1-B Update the Parks, Recreation and Open Space Comprehensive Master Plan to reflect projected community needs and continue to use the Master Plan as the primary tool for planning specific capital improvements and parks and recreation programming in Moreno Valley. The update should incorporate priorities, phasing

and funding mechanisms and should also address completion of the multi-use trail system.

- PPS.1-C Explore the potential for additional linear parks along public and private utilities easements, including the California Aqueduct.
- PPS.1-D Evaluate changes to parkland dedication requirements that will ensure the adequate provision of parkland. These changes may include updating the municipal code to extend parkland dedication requirements to residential projects of fewer than 50 units and requiring that large residential project provide public open space and amenities on-site.
- PPS.1-E Work with Moreno Valley Unified School District and Val Verde Unified School District to expand shared use of parks and recreational facilities.
- PPS.1-F Periodically assess in-lieu parkland dedication fees, park improvement impact fees, and other fees and charges to ensure they are adequately providing for community need and competitive within the region.
- PPS.1-G Leverage city funds to access grants for the construction and maintenance of parks and recreational facilities from federal or state government, philanthropic organizations, or private partners.
- PPS.1-H Investigate the feasibility of new park financing strategies such as impact bonds or public-private partnerships that make strategic use of public investment for community benefit.

Construction of these future parks could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future parks are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new parks. Furthermore, these future parks would be subject to 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR. Therefore, the project would develop future park facilities that would compensate that would address substantial increase in the use of parks that would occur under project buildout, and implementation of the mitigation framework established in this EIR would reduce impacts associated with the provision of new or physically altered parks to a level less than significant.

### **4.15.6 Cumulative Analysis**

The impact analysis presented in Sections 4.15.5.1 and 4.15.5.2 above was cumulative in nature because it considers the need for future facilities to serve the entire Planning Area. As described in Sections 4.15.5.1 and 4.15.5.2 above, future development would be subject to the payment of a DIF that would be used exclusively for future facility improvements necessary to ensure contribution of its fair share of the cost of facilities and equipment determined to be necessary to adequately accommodate new development in the city.

Payment of the DIF would allow future site-specific development to contribute to its fair share cost of facilities and equipment due to the increased demand for police protection facilities. Construction of future public facilities could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future public facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new public facilities. Furthermore, these future public facilities would be subject to 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR. Therefore, the project would not contribute to a cumulative impact related to public services and recreation.

## **4.15.7 Significance of Impacts before Mitigation**

### **4.15.7.1 Topic 1: Public Services**

#### **a. Fire Protection**

Future fire protection facilities would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment, and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the provision of new or physically altered fire protection facilities to a level less than significant.

#### **b. Police Protection**

Future police protection facilities would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment, and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the provision of new or physically altered police facilities to a level less than significant.

#### **c. Schools**

Future schools would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment, and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the provision of new or physically altered schools to a level less than significant.

#### **d. Other Public Facilities**

Future libraries would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment, and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the provision of new or physically altered libraries to a level less than significant.

### **4.15.7.2 Topics 2 and 3: Parks and Recreational Facilities**

Future parks would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment, and the programmatic mitigation framework established in this EIR. Therefore, the project would develop future park facilities that would compensate that would address substantial increase in the use of parks that would occur under project buildout, and implementation of the mitigation framework established in this EIR would reduce impacts associated with the provision of new or physically altered parks to a level less than significant.

## **4.15.8 Mitigation**

### **4.15.8.1 Topic 1: Public Services**

#### **a. Fire Protection**

Impacts would be less than significant. No mitigation is required.

#### **b. Police Protection**

Impacts would be less than significant. No mitigation is required.

#### **c. Schools**

Impacts would be less than significant. No mitigation is required.

#### **d. Other Public Facilities**

Impacts would be less than significant. No mitigation is required.

### **4.15.8.2 Topics 2 and 3: Parks and Recreational Facilities**

Impacts would be less than significant. No mitigation is required.

## **4.15.9 Significance of Impacts after Mitigation**

### **4.15.9.1 Topic 1: Public Services**

#### **a. Fire Protection**

Impacts would be less than significant. No mitigation is required.

#### **b. Police Protection**

Impacts would be less than significant. No mitigation is required.

**c. Schools**

Impacts would be less than significant. No mitigation is required.

**d. Other Public Facilities**

Impacts would be less than significant. No mitigation is required.

**4.15.9.2 Topics 2 and 3: Parks and Recreational Facilities**

Impacts would be less than significant. No mitigation is required.

## 4.16 Transportation

This section evaluates potential impacts related to transportation due to implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the entire city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area. This section utilizes the results of the Moreno Valley General Plan Circulation Element Vehicle Miles Traveled Impact Assessment Memorandum (VMT Memo) prepared for the project (Appendix E).

### 4.16.1 Existing Conditions

#### 4.16.1.1 Existing Street System

##### a. Roadway Network

The city is connected regionally by State Route 60 (SR-60) and Interstates 215 (I-215). SR-60 bisects the city and provides east-west connectivity to surrounding metropolitan areas. I-215 borders the city on the west and provides north-south connectivity. The roadway network in the Planning Area consists of freeways, boulevards, arterials, collectors, and local streets. The roadway network classifications below have been developed to guide long range transportation planning within the Planning Area to balance access and capacity.

##### *Freeways*

Freeways generally provide high speed, high capacity inter-regional access. Their primary function is to move vehicles through or around the city; thus, there is no access to adjacent land, and limited access to arterial streets. Freeways contain anywhere from 4 to 12 lanes with recommended design volumes from 80,000 to 210,000 vehicles per day. The City has no direct control over freeways as they are maintained by Caltrans and improvements are programmed through the Riverside County Transportation Commission (RCTC).

##### *Arterials*

Arterial streets carry the majority of traffic traveling through the city. They serve two primary functions: to move vehicles into and through the city and to serve adjacent commercial land uses. They provide access to freeways as well as major activity centers and residential areas. Driveways and other curb cuts along arterials are designed to minimize disruption to traffic flow. Sidewalks are typically included along arterials and protected Class I or IV bike lanes are recommended. Truck routes are designated along arterials. The desired maximum roadway capacity on arterials averages from 30,000 to 55,000 vehicles per day



depending on number of lanes, type and width of directional separation, presence of on-street parking or bicycle facilities, configuration and frequency of access to adjacent land uses, and intersection configurations. Moreno Valley has several designations of varying right-of-way (ROW), the widest Divided Major Arterial (134-foot ROW), Divided Arterial (110-foot ROW), Arterial (100-foot ROW) and down to a Minor Arterial (88-foot ROW).

### ***Boulevards***

Boulevards are a type of arterial designed to connect major destinations within the city, and are highly visible and aesthetically landscaped with shade trees and wide sidewalks. Mixed-Use Boulevards in the city provide for high volumes of vehicle flow (40,000-55,000 vehicles per day) including trucks, while providing a wide pedestrian parkway with access to residences along the length of the corridors and shops and services primarily at intersections.

### ***Collectors***

Collectors are intended to carry traffic between the arterial street network and local streets or directly from the access drives of higher intensity land uses. Collectors serve commercial, residential, or public uses, and are generally two-lane roadways with sidewalks and bicycle facilities. The desired roadway capacity on a collector street is less than 12,000 vehicles per day. Moreno Valley has designated Industrial Collectors and Neighborhood Collectors. Industrial Collectors are designed primarily for access to industrial and logistics uses that emphasize truck access. Bike facilities on these roads are preferred off-street or with additional protective buffers and/or barriers. Neighborhood Collectors are residential streets that prioritize low vehicle speeds and low-stress bicycle and pedestrian use on parallel routes to arterials.

### ***Local Streets***

Local streets are designed to serve adjacent land uses only. They allow access to residential driveways and often provide parking for the neighborhood. They are not intended to serve through traffic traveling from one street to another, but solely local traffic. Sidewalks and shared bicycle facilities are appropriate on local streets. The desired roadway capacity on a residential street should not exceed about 2,500 vehicles per day and 200-300 vehicles per hour during peak periods. The maximum residential traffic volume that is acceptable to persons living along a street may vary from one street to another depending on roadway width, type of dwelling units (i.e., high density apartments versus single-family homes), presence of schools and other factors. The maximum volume of 2,500 is, therefore, to be used as a guide only, and a neighborhood's sensitivity to potential impacts need to be carefully considered.

### 4.16.1.2 Housing/Employment Dynamics

Based on 2017 American Community Survey and the 2017 Longitudinal Employer-Household Dynamics Origin Destination Employment Statics, commute patterns for employed city residents are as follows:

- 30 percent of residents travel less than 10 miles to reach their employment.
- 30 percent of residents travel between 10 and 24 miles to reach their employment.
- 40 percent of residents travel 25 miles or more to reach their employment.

Over two-thirds of city residents travel more than 10 miles to reach their places of employment. The small share of residents traveling less than 10 miles to reach their employment indicates that the city has a relatively small number of people who both live and work in Moreno Valley. An analysis was conducted for the inflow and outflow of workers into the city. Inflow includes people who are employed in the city but live outside of the area, and outflow includes those that live in the city but are employed outside of the area. The analysis determined that 33,621 people who are employed within the city live within another jurisdiction. 67,867 people live within the city but travel to another jurisdiction for employment, while only 11,070 people live and work within the city. Based on these statistics, approximately 14 percent of the working population lives and works in the city, while the other 86 percent lives in the city but is employed outside of it. Table 4.16-1 shows the different counties to which city residents travel for work.

County	Count	Share
Riverside County	34,899	44.2%
San Bernardino County	16,837	21.3%
Los Angeles County	11,623	14.7%
Orange County	8,299	10.5%
San Diego County	3,193	4.1%
Ventura County	512	0.6%
All Other Locations	3,574	4.6%
<b>TOTAL</b>	<b>78,937</b>	<b>100.00%</b>
SOURCE: U.S. Census Bureau 2017: OnTheMap Application. Longitudinal-Employer Household Dynamics Program. <a href="http://onthemap.ces.census.gov/">http://onthemap.ces.census.gov/</a> .		

The ratio of jobs to employed residents is often used as an indicator of commute balance. A ratio close to 1.0 indicates a healthy balance and suggests that many people who live in the community are able to find jobs there as well. A high ratio indicates the community is rich in jobs, while a low ratio indicates that many residents need to commute to other cities for work. With 44,331 jobs and 78,937 employed residents in 2018, Moreno Valley has a ratio of 0.56, indicating a heavy out-commute. A focus on creating more jobs locally can help address this imbalance, reducing the need for long commutes and allowing Moreno Valley residents to spend more time with family and friends. About 90 percent of Moreno Valley residents work in Riverside, Orange, Los Angeles, or San Bernardino counties. Moreno Valley residents

traveling to work experience heavy levels of morning and evening congestion on freeways such as I-10, I-15, SR-60, SR-91, and I-215.

### a. Mode Choice

Table 4.16-2 presents the transportation modes utilized for work commutes within the city, Riverside County, and California. The primary mode of travel for all three geographic areas is the automobile, which make up approximately 92 percent of total travel for the city, 90 percent of travel for Riverside County, and 84 percent for California. Public transit constitutes approximately one percent of work commutes for both the city and Riverside County, which is lower than the California average of 5 percent. Bicycling and walking are less common in the city compared to the county and state.

Mode Choice	Moreno Valley	Riverside County	California
Single-Occupant Auto	77%	77%	74%
Carpool	15%	13%	10%
Public Transit <sup>1</sup>	1%	1%	5%
Bicycling/Walking	1%	2%	4%
Other Means	1%	1%	1%
Work at Home	3%	5%	6%

SOURCE: U.S. Census Bureau 2013-2017 American Community Survey 5-Year Estimates.  
<sup>1</sup>Public transit includes metro ridership.

### b. Vehicle Miles Traveled

Vehicle miles traveled (VMT) measures the number of miles traveled during a specified time within a specific region. Cities with more accessibility to key destinations and job centers in a region tend to generate less VMT on a per service population (service population is resident population plus employment) or per household basis compared to locations further away from job centers. After adjusting for commute distances, other things being equal, VMT can also be a good proxy to evaluate whether residents use local services or travel farther for those services. Table 4.16-3 presents the VMT for multiple cities in Riverside County from the Base Year (2012) Riverside Traffic Analysis Model (RIVTAM), which measures travel demand using the “full accounting method.” The full accounting method tracks the full length of any trip that has at least one trip end in the identified city to its ultimate destination.

Moreno Valley VMT per service population is more than 15 percent lower than the average of incorporated cities in Riverside County and western Riverside County. The VMT per household is also lower than the comparative regions. These VMT per capita estimates signify that Moreno Valley is more efficient from a VMT perspective than other cities within Riverside County.

**Table 4.16-3  
Vehicle Miles Traveled Summary**

City/Region	VMT	VMT per Service Population <sup>1</sup>	VMT per Household
Banning	1,110,797	29.8	108.9
Beaumont	1,219,970	27.9	101.3
Blythe	294,422	24.7	86.9
Calimesa	375,558	36.2	103.7
Canyon Lake	157,544	34.8	99.0
Cathedral City	1,409,540	22.4	82.5
Coachella	903,404	17.9	99.1
Corona	6,784,257	30.5	149.8
Desert Hot Springs	933,639	27.3	92.0
Eastvale	1,635,856	27.0	115.8
Hemet	2,295,355	22.7	76.5
Indian Wells	282,305	36.5	114.4
Indio	1,998,261	19.8	82.6
Jurupa Valley	3,637,399	29.8	145.3
Lake Elsinore	2,489,485	36.3	155.2
La Quinta	1,234,648	25.6	87.6
Menifee	2,998,816	31.0	99.5
Moreno Valley	5,505,655	24.5	108.3
Murrieta	3,655,216	28.5	112.0
Norco	1,522,109	36.3	200.5
Palm Desert	2,830,521	33.2	123.2
Palm Springs	2,283,456	31.3	99.6
Perris	2,367,263	27.6	142.8
Rancho Mirage	1,108,444	35.5	117.0
Riverside	12,130,842	27.8	130.1
San Jacinto	1,433,085	28.9	111.4
Temecula	3,690,123	26.2	119.6
Wildomar	1,193,167	32.9	124.4
Western Riverside County	67,129,140	29.8	126.4
Riverside County	83,929,504	29.3	120.9
SCAG Region <sup>2</sup>	626,112,185	24.3	106.4

SCAG = Southern California Association of Governments  
<sup>1</sup>Service population is the sum of population and employment in the city.  
<sup>2</sup>Estimates for the SCAG region were completed using Riverside Traffic Analysis Model, which is calibrated specifically for Riverside County. Estimates are provided for comparison purposes only.

### 4.16.1.3 Pedestrian and Bicycle Network

Active modes of transportation provide environmental, economic, and social sustainability to a city and its transportation system while improving public and personal health. Inadequate facilities misuse valuable resources and discourage potential users. Well-designed pedestrian and bicycle facilities are needed to make active transportation safe, accessible, attractive, and comfortable enough to be a desirable alternative to driving. It is important to provide a seamless transportation system for all modes and for all people to improve circulation. The Circulation Element of the existing 2006 General Plan focuses on vehicular travel but encourages the proposal of policies and programs that facilitate pedestrian improvements.

### a. Sidewalks and Crosswalks

Pedestrian facilities within the Planning Area consist of sidewalks and crosswalks, along with multi-use trails. Figure 4.16-1 presents the locations of existing and proposed bicycle and pedestrian facilities within the city. Most residential and commercial developments provide sidewalks on public streets and internal circulation. Areas with no existing sidewalks are mainly located in undeveloped areas or in a more rural area in the eastern portion of the city and along the city boundary. Sidewalks vary from wide and meandering curb-separated sidewalks to narrow pathways on the side of the road. Sidewalks are sometimes obstructed, incomplete mid-block, or damaged. Crosswalks at signalized intersections are marked and are usually provided for all approaches. Crosswalks at unsignalized intersections are generally not marked, although crosswalks around schools are marked at intersections.

The city is a community designed with auto travel in mind, featuring a suburban tract housing layout, ample parking, major through streets, and separation of land uses that comprise a notable portion of the city. Although walking may not be a viable form of transportation for errand trips, the ample sidewalk widths in established neighborhoods provide a walking environment that accommodates walking trips for leisure and exercise. Factors that affect walkability and the pedestrian experience in the city are described below:

- **Direct, Fine-Grained Pedestrian Networks.** Walking is more efficient and desirable as a means of transportation if direct pedestrian travel, rather than circuitous routes, are available. This is achieved through the development of fine-grained networks of pedestrian pathways that allow for direct access to destinations.
- **Sidewalk Continuity:** Communities are more walkable if sidewalks do not end abruptly and are present on the entire segment and both sides of a roadway. This is especially important for mobility-impaired users or those pushing small children in strollers.
- **Sidewalk Conditions:** This refers to the physical condition of sidewalk surfaces. Sidewalks that are broken or cracked can deter walkability and impede mobility; particularly for persons with disabilities, such as those in wheelchairs, persons using walkers, or strollers.
- **Shading:** Persons are more inclined to walk in areas where there is shade present, particularly in southern California with its relatively warm weather and limited rainfall, as compared to other locations. Additionally, shade trees create an aesthetic value that is pleasing to the pedestrian.

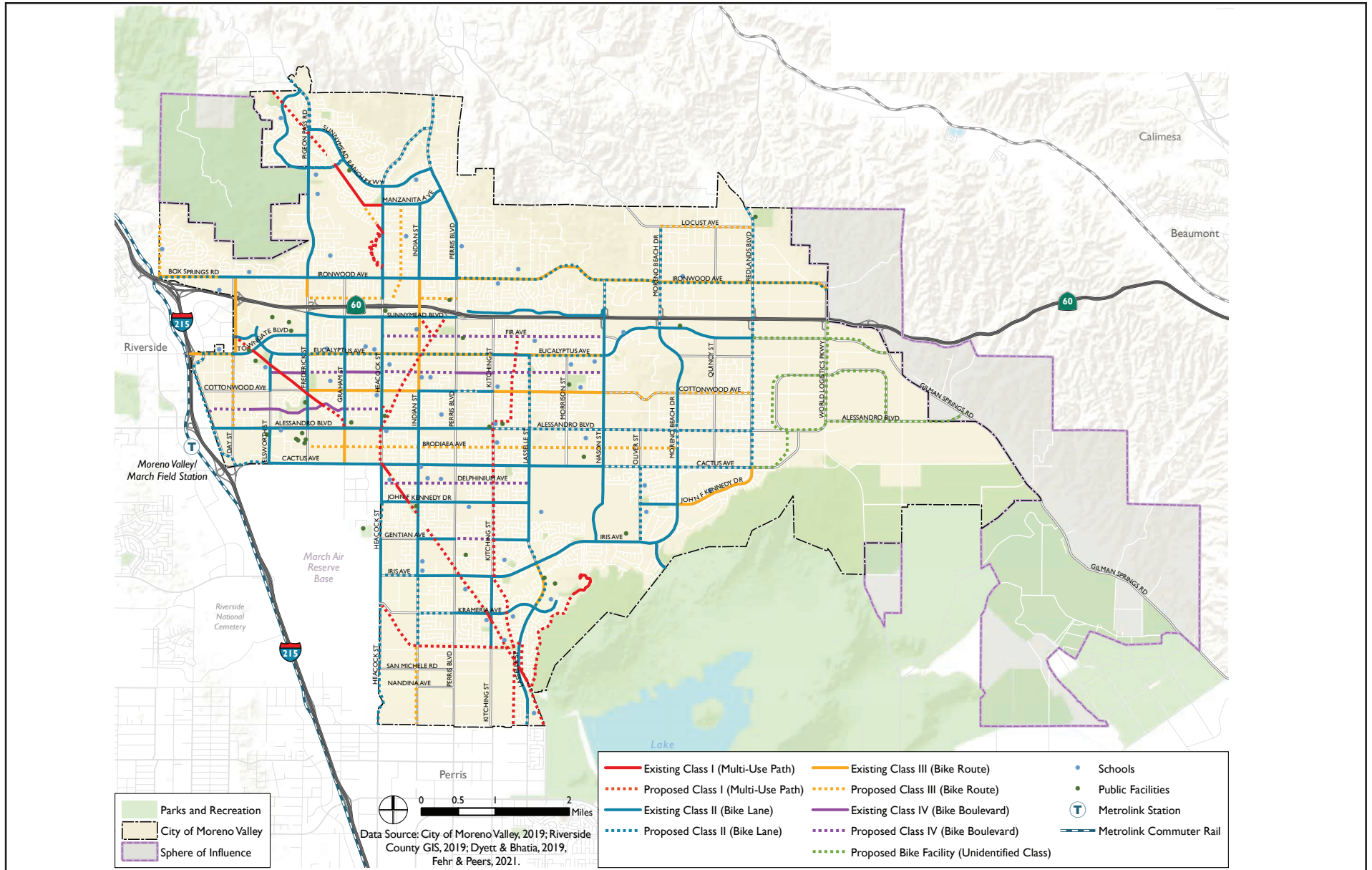


FIGURE 4.16-1

Existing and Planned Bicycle and Pedestrian Network

## b. Trails

The Moreno Valley Parks and Community Services Department maintains and operates over 675 acres of parks, trails, and park facilities. Existing multi-use trails accommodate pedestrians, equestrians, and bicyclists. In some instances, existing trails support access to State or regional trails within or near the city. For example, the Moreno Valley M Trail supports access to Box Mountain Regional Park trails. Additionally, the Rancho Verde Trail connects to trails near Lake Perris State Recreation. The Juan Bautista de Anza trail between the intersection of Eucalyptus Avenue/Arbor Park Lane in the north and Lasselle Street in the south provides bicycle northwest-southeast connectivity.

Proposed trails would close gaps between trails in the northwest, northeast, middle, and southern parts of the city and support active transportation in Moreno Valley. Some examples of proposed connections are listed below:

- The Cold Creek Trail in the middle of the city would be connected to the existing trail along Cactus Avenue.
- Proposed trails in nearby neighborhoods would be connected to the existing regional trail on Vista Suelto Road.

Proposed trails in the city not only provide opportunity for recreational activity, but afford off-street connectivity between neighborhoods, parks, schools, public facilities, and major job centers.

## c. Bicycle Network

With relatively flat terrain and a rectilinear street grid, Moreno Valley is an inherently bikeable community. Improving bicycling facilities can increase the likelihood and desirability of active transportation modes for short distance trips, school trips, and recreational activities. By shifting mode share to include higher rates of active travel, the city can reduce greenhouse gas emissions and promote a healthy lifestyle, consistent with Assembly Bill (AB) 32 and other state laws. The different types of bicycle facilities designated in Moreno Valley are described below:

- **Class I Bikeways (Multi-Use Paths).** Class I bikeways are facilities that are physically separated from vehicles, designated for the exclusive use of bicyclists and pedestrians with minimal vehicle crossings.
- **Class II Bikeways (Bike Lanes).** Class II bikeways are striped lanes designated for the use of bicycles on a street or highway. Vehicle parking and vehicle/pedestrian cross flow are permitted at designated locations.
- **Class III Bikeways (Bike Routes).** Class III bikeways, also referred to as bike routes, are only identified by signs or pavement markings. A bicycle route is meant for use by bicyclists and for motor vehicle travel (i.e., shared use).

- **Class IV Bikeways (Cycle Tracks).** Class IV bikeways, also referred to as cycle tracks, are protected bike lanes, which provide a right-of-way designated exclusively for bicycle travel within a roadway that is protected from vehicular traffic with devices such as curbs, flexible posts, inflexible physical barriers, or on-street parking.
- **Bicycle Boulevards.** Bicycle Boulevards are convenient, low-stress cycling environments on low traffic volume streets, typically parallel to higher traffic volume streets as an alternative to them. These roads prioritize bicyclists and typically include speed and traffic volume management measures, such as intersection ROW control, to discourage motor vehicle traffic.

#### 4.16.1.4 Public Transit

Public transportation is a vital part of the circulation system within the Planning Area. Transit expands mobility options to citizens that may not be able to afford or physically operate other means of travel, while some choose not to drive. Figure 4.16-2 presents existing transit facilities located within the Planning Area.

##### a. Riverside Transit Agency

The Riverside Transit Agency (RTA) provides the majority of public transportation within the Planning Area via fixed route and paratransit bus services. RTA provides routes within the city that connect to major destinations such as the Moreno Valley/March Field Metrolink Station, Perris Station Transit Center, University of California, Riverside (UCR), and Moreno Valley Mall. Major bus routes within the Planning Area include routes 11, 16, 18, 19, 19A, 20, and 31. Additionally, RTA has one commuter link express bus route within the city. Route 208 connects the cities of Temecula, Murrieta, Perris, Moreno Valley, and Riverside. Commuter link express bus routes provide peak hour services for commuters in the morning and evening on weekdays. Route 31 also provides connections to Beaumont, Banning, Hemet, and San Jacinto and passengers can transfer in Beaumont to Sunline Route 10 for service to the Coachella Valley. RTA also provides Dial-A-Ride services for seniors and persons with disabilities.

##### b. Metrolink

Metrolink is a commuter rail program operated by the Southern California Regional Rail Authority (SCRRA), providing service from outlying suburban communities to employment centers such as Burbank, Irvine, and downtown Los Angeles. The Moreno Valley/March Field Metrolink Station is located less than one-half mile west of the city limits. The 91/Perris Valley Line (PVL) train services Metrolink stations in the cities of Perris, Riverside, Corona, Fullerton, Buena Park, Norwalk/Santa Fe Springs, and Los Angeles. The establishment of the PVL was a joint effort of RCTC and Federal Transit Administration (FTA). The 24-mile extension of the PVL was the first major enhancement to the route network in 14 years.





The Metrolink 10-Year Strategic Plan (2015-2025) indicates that through a partnership with Metro, Metrolink will experiment with lower fares across the board and targeted discounts on shorter distance trips with the goal to increase ridership and revenue. Through 2025, ridership growth on the PVL is expected to increase between approximately 54 percent and 151 percent, depending on enhancements of the existing network and overlay of additional service patterns through 2025<sup>1</sup>.

## **4.16.2 Applicable Regulatory Requirements**

### **4.16.2.1 State Regulations**

#### **a. AB 1358 (Complete Streets)**

In 2008, the state passed the California Complete Streets Act (AB 1358), requiring circulation elements to include a “Complete Streets” approach that balances the needs of all users of the street. Complete Streets are streets designed and operated to enable safe access for all users, including pedestrians, bicyclists, motorists, and transit riders of all ages and abilities. The precise definition of a Complete Street can vary depending on the context and primary roadway users, but there are some common elements found in successful Complete Streets policies. These policies consider the needs of all users of the street in the planning, design, construction, operation, and maintenance of transportation networks. This framework allows policymakers to shift the goals, priorities, and vision of local transportation planning efforts by emphasizing a diversity of modes and users.

#### **b. SB 375 (Sustainable Communities and Climate Protection Act)**

The Sustainable Communities and Climate Protection Act, or Senate Bill (SB) 375, provides incentives for cities and developers to bring housing and jobs closer together and to improve public transit. The goal is to reduce the number and length of automobile commuting trips, helping to meet the statewide targets for reducing greenhouse gas emissions set by AB 32.

SB 375 requires each Metropolitan Planning Organization to add a broader vision for growth to its transportation plan through development of a Sustainable Communities Strategy (SCS). The SCS must lay out a plan to meet the region’s transportation, housing, economic, and environmental needs in a way that enables the area to lower greenhouse gas emissions. The SCS should integrate transportation, land use, and housing policies to plan for achievement of the emissions target for each region. The Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) were adopted in 2016.

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<sup>1</sup>Growth is based on the 2015 existing average daily ridership of 2,467. This data is from the Metrolink 10 Year Strategic Plan (2015-2025).

For consistency with the regional planning objectives of the SCS, the City considered the following during development of the 2021 GPU:

- Support transit-oriented development;
- Support infill housing development and redevelopment;
- Support mixed-use development, which improves community walkability;
- Improve jobs-to-housing ratio;
- Promote land use patterns that encourage the use of alternatives to single-occupant automobile use;
- Apply Transportation System Management (TSM) and Complete Streets practices to arterials to maximize efficiency;
- Improve modes through enhanced service, frequency, convenience, and choices; and
- Expand and enhance Transportation Demand Management (TDM) practices to reduce barriers to alternative travel modes and attract commuters away from single-occupant vehicle travel.

### **c. SB 743 (General CEQA Reform, VMT)**

SB 743 was signed into law on September 27, 2013, which seeks to balance the needs of congestion management, infill development, public health, greenhouse gas reductions, and other goals. The Office of Planning and Research released the *Technical Advisory on Evaluating Transportation Impacts in CEQA*<sup>2</sup> in December 2018. Western Riverside Council of Governments (WRCOG) released the *WRCOG SB 743 Implementation Pathway*<sup>3</sup> in March 2019, a guiding document for VMT analysis methodology, thresholds, and mitigation strategies for transportation impact evaluation for WRCOG agencies such as Moreno Valley. Furthermore, for the California Environmental Quality Act (CEQA) process, this bill eliminates measures such as auto delay, level of service (LOS), and other vehicle-based measures of capacity in many parts of California. Instead, other measurements such as VMT are to be utilized to measure impacts.

## **4.16.2.2 Regional Regulations**

### **a. Transportation Demand Management**

TDM refers to a comprehensive strategy to reduce driving and resulting VMT by promoting alternatives such as public transit, carpooling, bicycling, walking, and telecommuting. While some TDM measures can be undertaken by the City, such as investments in facilities and

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<sup>2</sup>Technical Advisory on Evaluating Transportation Impacts in CEQA: [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf).

<sup>3</sup>WRCOG SB 743 Implementation Pathway: <https://www.fehrandpeers.com/wp-content/uploads/2019/12/WRCOG-SB743-Document-Package.pdf>.

programs to encourage alternative modes of transportation, other TDM measures require collaboration with other jurisdictions, for example with transit providers to seek expanded service, or with employers to encourage flexible work schedules and the provision of on-site childcare, preferential carpool parking, and subsidized transit passes.

SCAG has developed a long-range planning vision to balance future mobility and housing needs with economic, environmental, and public health goals. The SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) has allocated \$7.3 billion through 2045 to implement TDM strategies throughout the region. There are three primary goals of SCAG's TDM program:

- Reduce the number of single-occupant vehicle trips and per capita VMT through ridesharing (which includes carpooling and vanpooling) and providing first/last mile services to and from transit;
- Redistribute or eliminate vehicle trips during peak demand periods by supporting telecommuting and alternative work schedules; and
- Reduce the number of single-occupant vehicle trips through use of other modes such as transit, rail, bicycling, and walking, or other micro-mobility modes.

Additionally, WRCOG, of which the City is a member agency, has identified the following key strategies for TDM as most appropriate in the WRCOG subregion:

- Diversifying land use;
- Improving pedestrian networks;
- Implementing traffic calming infrastructure;
- Building low-stress bicycle network improvements;
- Encouraging telecommuting and alternative work schedules; and
- Providing ride-share programs.

## **b. Riverside County Congestion Management Program**

The passage of Proposition 111 in June 1990 established a process for each metropolitan county in California, including Riverside, to prepare a Congestion Management Plan (CMP). The RCTC prepared the County's CMP in consultation with the County of Riverside and the cities within Riverside County. The CMP seeks to align land use, transportation, and air quality management efforts in order to promote reasonable growth management programs that effectively use statewide transportation funds, while ensuring that new development pays its fair share of needed transportation improvements.

The focus of the CMP is the development of an Enhanced Traffic Monitoring System, which would allow RCTC to access real-time traffic count data to evaluate the condition of the Congestion Management System (CMS), as well as to meet other monitoring requirements at the state and federal levels. RCTC's Long Range Transportation Study, approved in 2019, incorporates the state and federal CMP into the plan, including performance standards, conformance, monitoring, deficiency plan process, and management strategies.

Per the LOS target of “E” adopted by RCTC, when a CMS segment falls to “F,” a deficiency plan must be prepared by the local agency where the deficiency is located. Other agencies identified as contributors to the deficiency will also be required to coordinate with the development of the plan. The plan must contain mitigation measures, including TDM strategies and transit alternatives, and a schedule of mitigating the deficiency. To ensure that the CMS is appropriately monitored to reduce the occurrence of CMP deficiencies, it is the responsibility of local agencies to consider the traffic impacts on the CMS when reviewing and approving development proposals.

### **c. Measure A (Riverside County Half-Cent Sales Tax)**

In November 1988, Riverside County voters approved Measure A, a one-half cent increase in sales tax over a 20-year period to be used for transportation purposes. A major factor contributing to the support of Measure A was the “return to source” concept, which requires the additional sales tax revenue generated in a specific geographic area be used to finance projects within that same area.

The program has been so successful that in November 2002, Riverside County voters approved a 30-year extension of Measure “A” (2009-2039). Despite its success, Measure A funds only contribute a portion of the transportation improvements necessary to prevent a potential breakdown of the regional transportation system.

## **4.16.3 Methodologies for Determining Impacts**

Fehr & Peers completed a VMT Memo (see Appendix E) consistent with the requirements of SB 743 and the *City of Moreno Valley Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment* (June 2020).

The impact analysis also evaluated how the proposed transportation network improvement and 2021 GPU goals and policies would serve to improve transportation conditions under project buildout.

## **4.16.4 Basis for Determining Significance**

Thresholds used to evaluate impacts to transportation are based on applicable criteria in the CEQA Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact would occur if the project would:

- 1) Conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- 2) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);
- 3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- 4) Result in inadequate emergency access.

## 4.16.5 Impact Analysis

### 4.16.5.1 Topic 1: Circulation System

*Would the project conflict with a plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

Figure 4.16-3 presents the proposed circulation network. As the Planning Area continues to experience residential, employment, and commercial growth, a connected, multi-modal street network would be essential to ensure efficient commutes for work and goods movement, safe active transportation, and easy access to retail and entertainment.

The 2021 GPU proposes a “layered network” approach, where traffic demands of the Planning Area and system-wide needs of different modes can be used as inputs as streets are redesigned and configured to better meet the needs of bicyclists, pedestrians, and transit, and enable everyone to efficiently and safely navigate through the Planning Area. Considering system-wide needs means assessing whether the system as a whole is able to meet the needs of travelers. The layered network approach designates modal emphasis by street to create a comprehensive street network. The layered network approach recognizes the need to accommodate all forms of traffic, but with the understanding that certain streets would emphasize certain forms of transportation. Layered networks balance vehicular transportation with “active transportation,” which is human-powered transportation that includes walking, cycling, using a wheelchair, in-line skating, or skateboarding. The layered network approach recognizes that not all modes can be accommodated acceptably on all streets within this city, but bicycle and pedestrian movement can be emphasized on specific streets. The layered network would also help ensure consistency with the California Complete Streets Act passed in 2008.

#### a. Circulation Network

The regional transportation projects listed below have broad regional significance and would reduce congestion within the Planning Area by increasing capacity of the regional transportation network:

- SR-60 Truck Lanes Project: 4.5-mile widening project on SR-60 between Gilman Springs Road and 1.4 miles west of Jack Rabbit Trail in the unincorporated Riverside County Badlands. This project will enhance the mobility and safety of SR-60 through the Badlands and improve trucking accessibility from Moreno Valley to the east. This project is anticipated to be completed in 2021.
- I-215 High Occupancy Vehicle (HOV) Lanes Project: 11-mile widening project on I-215 to add HOV lanes in each direction from Box Springs Road in Moreno Valley to Nuevo Road in Perris. This project is anticipated to improve travel time on I-215.

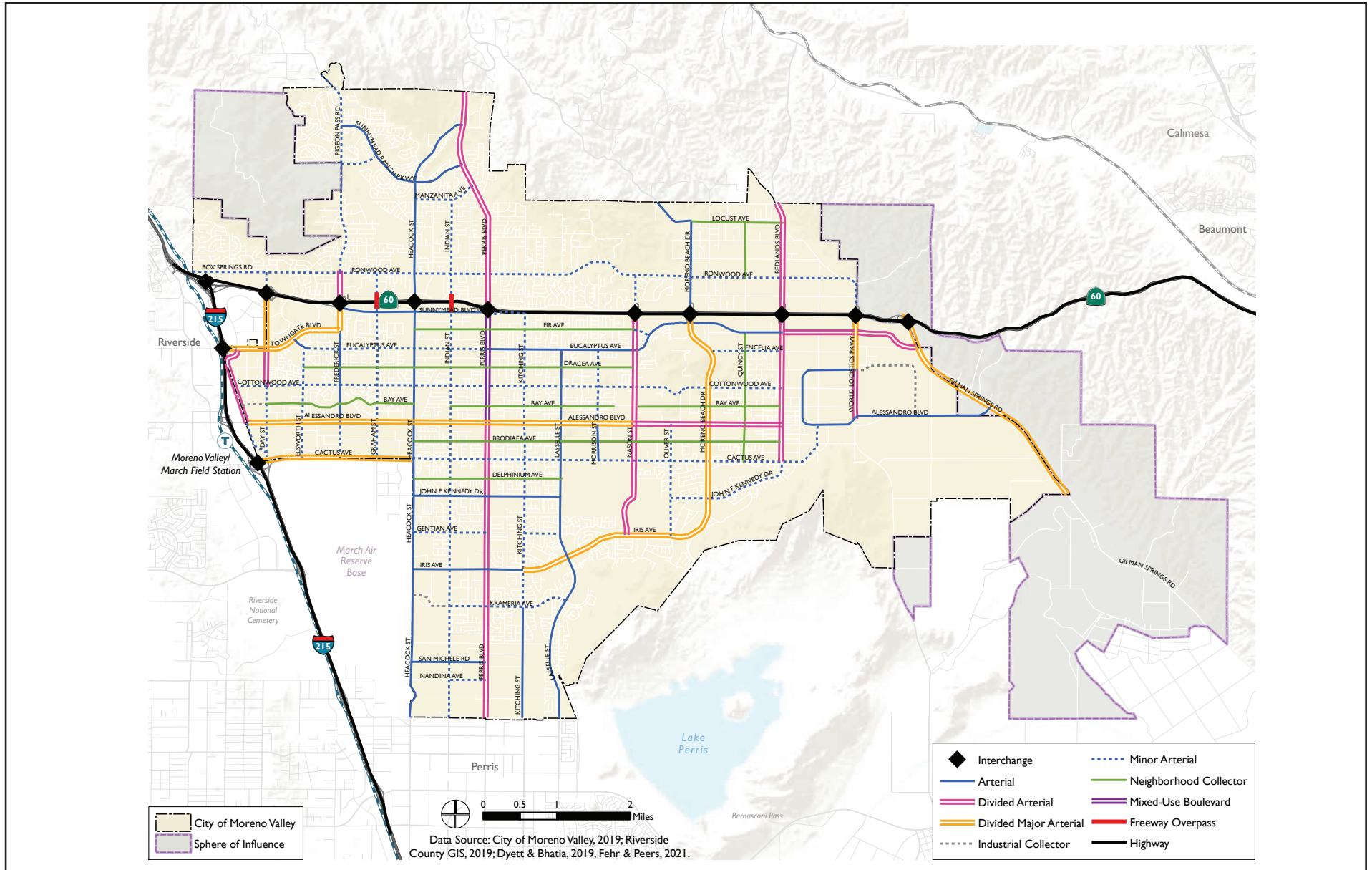


FIGURE 4.16-3  
Proposed Circulation Network

- Mid County Parkway Project: Also known as Community and Environmental Transportation Acceptability Process (CETAP) East, a 16-mile transportation corridor to relieve traffic congestion in southwestern Riverside County near San Jacinto and Perris. This project is anticipated to improve travel time between SR-79 and I-215 and provide connections that support multimodal transportation.
- CETAP West: 16-mile westerly extension of Mid County Parkway between I-15 in Corona and I-215 in Perris. This proposed project will provide an additional alternative east-west corridor from SR-91 between I-15 and I-215.
- Cajalco Road Improvement Project: 16-mile transportation corridor to relieve traffic congestion in southwestern Riverside County near Corona and Perris. This project will provide an alternative east-west corridor to SR-91 between I-15 and I-215.
- The Ethanac Road Improvement Project – 10-mile widening and realignment of the Ethanac corridor from I-15 in Lake Elsinore to I-215 in Perris. This project will provide additional east-west capacity and ease congestion on I-215.

The proposed circulation network would also implement the major roadway improvement projects listed below that are underway or planned. This is not an exhaustive list of all improvement projects, but highlights significant local improvement projects critical to the City's success.

- Eucalyptus Avenue Extension: Eucalyptus Avenue is the existing connection between Redlands Boulevard and World Logistics Parkway Street. The planned changes include the construction of three through lanes (two lanes in the westbound direction and one lane in the eastbound direction), the addition of medians, left-turn pockets, dedicated right-turn lanes, drainage improvements, landscaping, sidewalks, and a Class I bike path.
- Widening of Alessandro Boulevard: Alessandro Boulevard is planned to be widened from two to four lanes between Nason Street and Redlands Boulevard, and then approximately a half mile east of Redlands Boulevard to Gilman Springs Road, a project over five miles long. The improvements include medians, traffic signals, channelization, left-turn pockets, dedicated right turn, drainage, landscaping, sidewalks, bike lanes, and trails.
- Widening of Gilman Springs Road: Gilman Springs Road is planned to be widened from two to six lanes between SR-60 and Alessandro Boulevard, a project over five miles long. The improvements include medians, traffic signals, channelization, left-turn pockets, dedicated right-turn lanes, drainage, landscaping, sidewalks, and bike lanes.
- Gilman Springs Interchange Improvement: The Gilman Springs Road/SR-60 interchange improvement plans include the realignment of Gilman Springs Road and the removal of the existing eastbound and westbound ramps. The plans include widening the overcrossing from two to six through lanes, the westbound exit ramp



from one to two lanes and then to three lanes at the arterial, and the westbound loop and eastbound on-ramps from one lane to two lanes with a HOV lane. The improvements also include the addition of an auxiliary lane to the west of the interchange.

- **SR-60 Interchange Improvements:** Interchange improvements are proposed, in design and/or going to construction at Redlands Boulevard, World Logistics Center Parkway and Moreno Beach Drive.

Additionally, the 2021 GPU Circulation Element would implement the following goals, policies, and actions to improve the Planning Area circulation network.

### ***Goal***

C.1: Strengthen connections to the regional transportation network.

### ***Policies***

C.1-1 Support regional infrastructure investments for all modes to relieve congestion and support healthy communities in the City of Moreno Valley.

C.1-2 Maintain ongoing relationships with all agencies that play a role in the development of the City's transportation system.

C.1-3 Cooperatively participate with SCAG, RCTC, WRCOG, and the TUMF [Transportation Uniform Mitigation Fee Central Zone Committee to facilitate the expeditious construction of TUMF Network projects, and planning for a transportation system that anticipates regional needs for the safe and efficient movement of goods and people, especially projects that directly benefit Moreno Valley.

### ***Actions***

C.1-A Advocate for the completion of proposed and planned regional transportation projects as they will alleviate congestion on I-215 and SR-60, and will improve traffic conditions on City streets.

C.1-B Work with property owners, in cooperation with RCTC, to reserve rights-of-way for freeways, regional arterial projects, transit, bikeways, and interchange expansion and potential Community and Environmental Transportation Acceptability Process (CETAP) corridors through site design, dedication, and land acquisition, as appropriate.

C.1-C Pursue grant funding, including for major projects that enhance connectivity to the regional network.

**Goal**

- C-2: Plan, design, construct, and maintain a local transportation network that provides safe and efficient access throughout the City and optimizes travel by all modes.

**Policies**

- C.2-1 Design, plan, maintain, and operate streets using complete streets principles for all types of transportation projects including design, planning, construction, maintenance, and operations of new and existing streets and facilities. Encourage street connectivity that aims to create a comprehensive, integrated, connected network for all modes.
- C.2-2 Implement a layered network approach by prioritizing conflicting modes, such as trucks and bicyclists, on alternative parallel routes to provide safe facilities for each mode.
- C.2-3 Work to eliminate traffic-related fatalities and severe injury collisions by developing a transportation system that prioritizes human life on the roadway network.
- C.2-4 Space Collectors between higher classification roadways within development areas at appropriate one-quarter mile intervals.
- C.2-5 Prohibit points of access from conflicting with other existing or planned access points. Require points of access to roadways to be separated sufficiently to maintain capacity, efficiency, and safety of the traffic flow.
- C.2-6 Wherever possible, minimize the frequency of access points along streets by the consolidation of access points between adjacent properties on all circulation element streets, excluding collectors.
- C.2-7 Plan access and circulation of each development project to accommodate vehicles (including emergency vehicles and trash trucks), pedestrians, and bicycles.
- C.2-8 For developments fronting both sides of a street, require that streets be constructed to full width. Where new developments front only one side of a street, require that streets be constructed to half width plus an additional 12-foot lane for opposing traffic, whenever possible. Additional width may be needed for medians or left and/or right turn lanes.
- C.2-9 Require connectivity and accessibility to a mix of land uses that meets residents' daily needs within walking distance. Typically, this means creating walkable neighborhoods with block lengths between 330 feet and 660 feet in length, based on divisions of the square mile grid on which the city is laid out.
- C.2-10 Ensure that complete streets applications integrate the neighborhood and community identity into the street design and retrofits. This can include special

- provisions for pedestrians and bicycles that complement the context of each community.
- C.2-11 Incorporate traffic calming design into local and collector streets to promote safer streets.
- C.2-12 Recognize the need for modified sidewalk standards for local and collector roads within low density areas to reflect the rural character of those areas.

### ***Actions***

- C.2-A Update Standard Plan cross-sections consistent with best practices and to address new cross-sections adopted in the Circulation Diagram (Neighborhood Collector and Mixed-Use Boulevard).
- C.2-B Continue to implement the Bicycle Master Plan to provide low-stress bicycle network improvements citywide, and update the plan periodically as needed.
- C.2-C Develop curb space management guidelines that incorporate best practices and strategies for deliveries and drop-offs in commercial and mixed-use areas.
- C.2-D Invest in critical infrastructure and implement pilot programs to leverage new transportation technology.
- C.2-E Establish uniform, transparent and anonymized data-sharing to assist mobility informed decision-making while maintaining people's privacy.
- C.2-F As new transportation technologies and mobility services, including connected and autonomous vehicles, electric vehicles, electric bicycles and scooters, and transportation network companies (e.g., Uber and Lyft) are used by the public, review and update City policies and plans to maximize the benefit to the public of such technologies and services without adversely affecting the City's transportation network. Updates to the City's policies and plans may cover topics such as electric vehicle charging stations, curb space management, changes in parking supply requirements, shared parking, electric scooter use policies, etc.
- C.2-G Research best management practices for new designs, improvements, and infrastructure upgrades such as Autonomous Vehicle (AV) sensors in the roadway and lane striping to promote safety, smart infrastructure that can communicate with vehicles and vice versa, and in road electrification of vehicles. Consider developing standards to designate AV parking areas separate from standard parking areas, where AVs have the ability to stack park when not in use.
- C.2-H Evaluate opportunities to implement roundabouts as traffic control as new development projects are proposed, considering safety, traffic calming, cost, maintenance and greenhouse gas reduction related to idling.

**Goal**

- C-3: Manage the City's Transportation System to minimize congestion, improve flow, and improve air quality.

**Policies**

- C.3-1 Strive to maintain Level of Service (LOS) "C" on roadway links, wherever possible, and LOS "D" in the vicinity of SR 60 and high employment centers. Strive to maintain LOS "D" at intersections during peak hours.
- C.3-2 Allow for a list of locations to be exempt from the LOS policy based on right-of-way constraints and goals and values of the community. The City Engineer shall update the exempted intersections and roadway segments list periodically to be included with the traffic impact study guidelines and adopted by ordinance.
- C.3-3 Where new developments would increase traffic flows beyond the LOS C (or LOS D, where applicable), require appropriate and feasible improvement measures as a condition of approval. Such measures may include extra right-of-way and improvements to accommodate additional left-turn and right-turn lanes at intersections, or other improvements.
- C.3-4 Require development projects to complete traffic impact studies that conduct vehicle miles traveled analysis and level of service assessment as appropriate per traffic impact study guidelines.
- C.3-5 Manage freeway bypass traffic during peak commute hours from SR-60 and I-215 through traffic signal timing coordination and Intelligent Transportation Systems (ITS) to limit impact on City streets.
- C.3-6 Require new developments to participate in Transportation Uniform Mitigation Fee Program (TUMF), the Development Impact Fee Program (DIF) and any other applicable transportation fee programs and benefit assessment districts.
- C.3-7 Support regional efforts for the development of a VMT mitigation impact fee program.
- C.3-8 Ensure that new development pays a fair share of costs to provide local and regional transportation improvements and to mitigate cumulative traffic deficiencies and impacts.
- C.3-9 Employ parking management strategies, such as shared parking in mixed use areas, on-street residential parking, and spill-over parking to avoid construction of unnecessary parking.
- C.3-10 Require traffic and parking management plans for major events to utilize travel demand management strategies encouraging transit and other alternatives to single occupant vehicles to limit the impact to City Streets.

- C.3-11 Implement National Pollutant Discharge Elimination System Best Management Practices relating to construction of roadways to control runoff contamination from affecting water resources.
- C.3-12 Evaluate opportunities to incorporate new materials, technologies or design features that improve performance of the circulation system.
- C.3-13 Promote efficient circulation planning at schools, partnering with the local school districts to optimize school drop-off/pick-ups.

### ***Actions***

- C.3-A Periodically review and update traffic impact study guidelines for vehicle miles traveled and level of service assessment.
- C.3-B Periodically collect traffic count data to support existing traffic operations and future infrastructure.
- C.3-C Update the City's standard roadway cross-sections and standard plans to reflect state-of-the-practice in safe and efficient roadway design.
- C.3-D Update ITS Master Plan to include latest technology and innovations, and continue investment to expand ITS and citywide camera system.

The City also utilizes Intelligent Transportation Systems (ITS) to improve roadway circulation, which refers to a set of tools that facilitates a connected, integrated transportation system. Applications of ITS include adaptive traffic prioritization signals aimed at congestion management and improving traffic flow, and the collection and dissemination of real-time travel information such as transit arrivals or traffic incident alerts. Other applications of ITS to be considered as transportation patterns change and emerging technologies come online may include connected and autonomous vehicles and smart city integration.

The City currently has an Advanced Traffic Management System (ATMS) that allows staff to monitor traffic at strategic locations throughout the city. The system allows for the transportation system to work more effectively and efficiently by providing the ability to adjust critical traffic signals from the City's Transportation Management Center (TMC). These tools allow the City to effectively monitor and address congestion issues.

Additionally, the City's Intelligent Transportation System incorporates innovative field infrastructure including fiber-optic communication media and end equipment, closed-circuit television cameras, permanent Dynamic Message Signs (DMS), advanced transportation controllers, and video and radar traffic signal detection. The City is able to differentiate between vehicles, bicyclists and pedestrians, helping traffic to flow more efficiently and improving safety for all road users. The City also has the ability to provide signal priority for buses on heavy transit corridors. Utilization of these tools, as well as implementation of the roadway improvements and goals, policies, and actions described above would improve the

circulation network through project buildout in 2040. Therefore, the project would not conflict with a plan, ordinance, or policy addressing roadway circulation, and impacts would be less than significant.

## **b. Pedestrian and Bicycle Network**

The City adopted a Bicycle Master Plan in November 2014, which recommends bicycle programs to improve facilities that can make it safer for users of all ages and abilities to ride a bicycle on city streets. Existing high traffic volume arterials and truck routes can conflict with existing and proposed bicycle routes throughout the City. The City's Bicycle Master Plan and Circulation Element have identified parallel east-west corridors (Neighborhood Collectors) to provide low-stress alternatives to riding on arterials as part of the layered network. The City still provides bicycle facilities on most major arterials and additional buffers/protection is recommended on high speed/volume roadways, especially along truck routes to limit conflicts. Additional bicycle infrastructure in congested areas, such as bicycle signal heads, traffic signal bicycle detection, green bicycle lanes, and two-stage turn queue boxes can further enhance bicycle facilities on high-stress corridors. Additionally, the 2021 GPU Circulation Element would implement the following goals, policies, and actions to improve the bicycle and pedestrian circulation.

### ***Goal***

C-4: Provide convenient and safe connections between neighborhoods and destinations within Moreno Valley.

### ***Policies***

C.4-1 Support the development of highspeed transit linkages or express routes connecting major destinations within the city and beyond, including the Metrolink Station, that would benefit the residents and employers in Moreno Valley.

C.4-2 Collaborate with major employers and other stakeholders to improve access and connectivity to key destination such as the Downtown Center, the Moreno Valley Mall, the hospital complexes, Moreno Valley College, and the Lake Perris State Recreation Area.

C.4-3 Support the establishment of a Transit Center/Mobility Hub in the Downtown Center.

C.4-4 All new developments shall provide sidewalks in conformance with the City's streets cross-section standards, and applicable policies for designated urban and rural areas.

C.4-5 Recognize that high-speed streets, high-volume streets and truck routes can increase pedestrian and bicycle stress levels and decrease comfortability. Provide increased buffers and protected bicycle lanes in high-stress areas, where feasible. Provide landscaped buffers where feasible to separate pedestrian environments

from the travel way adjacent to motor vehicles. Provide convenient and high-visibility crossings for pedestrians.

### **Actions**

- C.4-A Prepare and maintain a Pedestrian Access Plan supporting a safer and more convenient network of identified pedestrian routes with access to major employment centers, shopping districts, regional transit centers, schools, and residential neighborhoods; the plan should address safer routes to schools, safer routes for seniors, and increase accessibility for persons with disabilities.
- C.4-B The City shall actively pursue funding for the infill of sidewalks in developed areas. The highest priority shall be to provide sidewalks on designated school routes.
- C.4-C Continue ongoing coordination with transit authorities toward the expansion of transit facilities into newly developed areas.
- C.4-D Work with major employers, the hospital complexes, and Moreno Valley College to study alternatives to conventional bus systems, such as smaller shuttle buses (micro-transit), on-demand transit services, or transportation networking company services that connect neighborhood centers to local activity centers with greater cost efficiency.
- C.4-E Pursue regional, state and federal grant opportunities to fund design and construction of the City bikeway system.
- C.4-F Periodically review and update citywide wayfinding strategy that enhances access to key destinations, including Moreno Valley College, Riverside University Medical Center, Kaiser, and Lake Perris State Recreation Area.

### **Goal**

- C-5: Enhance the range of transportation operations in Moreno Valley and reduce Vehicle Miles Traveled.

### **Policies**

- C.5-1 Work to reduce VMT through land use planning, enhanced transit access, localized attractions, and access to non-automotive modes.
- C.5-2 Encourage public transportation that addresses the particular needs of transit-dependent individuals, including senior citizens, the disabled, and low -income residents.
- C.5-3 Encourage bicycling as an alternative to single occupant vehicle travel for the purpose of reducing fuel consumption, traffic congestion, and air pollution.

- C.5-4 Particularly in corridors and centers, work with transit service providers to provide first-rate amenities to support pedestrian, bicycle and transit usage, such as bus shelters and benches, bike racks on buses, high-visibility crossings, and modern bike storage.
- C.5-5 Encourage local employers to implement TDM strategies, including shared ride programs, parking cash out, transit benefits, allowing telecommuting and alternative work schedules.

### ***Actions***

- C.5-A Keep the City's traffic impact study guidelines current and revise the CEQA threshold of significance for VMT as appropriate.
- C.5-B Maintain a list of recommended Transportation Demand Management (TDM) strategies for employers and new developments.
- C.5-C Remain flexible in the pursuit and adoption of transportation funding mechanisms that fund innovative transportation solutions.
- C.5-D Work with RTA and Metrolink to increase transit service frequency, speed, and reliability and increase ridership. Strengthen linkages and access to the Metrolink Station.
- C.5-E Integrate transit access and information systems into employment centers, major destinations and new multi-family residential development.
- C.5-F Develop a Park Once strategy to promote walkability in mixed use centers and corridors.
- C.5-G Study the feasibility of implementing car-sharing program, working with established providers.

The project would also implement future pedestrian and bicycle facilities as shown in Figure 4.16-1 above. Therefore, the project would not conflict with a plan, ordinance, or policy addressing pedestrian and bicycle circulation, and impacts would be less than significant.

### **c. Public Transit**

To improve transit connectivity, the City will work with other local agencies to increase transit access through a combination of new routes and/or higher service frequency, expanded hours, and making the public transit experience more user friendly and attractive, such as through improved bus shelters that offer cooling/shade from the sun during drier months and protection against rainy/cold conditions during wetter months. As the City expands its transit offerings, the City will help support the prioritization of needs of seniors, minorities, low-income, disabled, and transit-dependent residents to ensure that everyone can make the trips they need to live, work, and play to their fullest potential.



Given that the majority of the Planning Area is of a suburban, low-density character, expanding public transit routes would likely be an inefficient method of attracting greater transit ridership. Other methods of attracting ridership could include focusing on providing high-quality service between employment centers and mixed-use destinations along the major corridors of the city, supplemented with features such as park-n-rides and pedestrian and bicycle infrastructure to create multi-modal transportation nodes, and coordinating with transit providers to promote bus user satisfaction through strategies such as reduced headways and improved on-time performance. Additionally, the 2021 GPU Circulation Element would implement the policies, and actions described above under goals C-4 and C-5 to improve public transit within the Planning Area. Therefore, the project would not conflict with a plan, ordinance, or policy addressing transit circulation, and impacts would be less than significant.

#### **4.16.5.2 Topic 2: Vehicle Miles Traveled**

*Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

CEQA Guidelines Section 15064.3 requires that the determination of significance for transportation impacts be based on VMT instead of a congestion metric such as LOS. The change in the focus of transportation analysis is the result of SB 743, as detailed in 4.16.2.1.

##### **a. Vehicle Miles Traveled Modeling**

The VMT Memo utilized the RIVTAM to estimate VMT under buildout of the project and existing 2006 General Plan. The VMT Memo interpolated between the base year (2012) and future year (2040)<sup>4</sup> to develop the appropriate existing baseline condition (2018). The total households and employment would be the same under buildout of both the project and existing 2006 General Plan. However, the project would increase the number multi-family residential units and decrease the number of single-family units compared to the existing 2006 General Plan while maintaining the same number of total units. Consequently, the project would have a projected buildout population size of 252,179, which would be less than the project buildout population of 256,600 for the existing 2006 General Plan. This reduced population projection for the project is due to the increased share of multi-family households in the 2021 GPU proposed land use plan, which typically have a lower household population. The project also anticipates a shift in the employment makeup in the City from retail/commercial to office employment. VMT modeling for buildout of both the project and the existing 2006 General Plan were updated to reflect the existing and proposed circulation networks. Table 4.16-4 presents the results of these VMT modeling scenarios.

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<sup>4</sup>The 2040 condition of RIVTAM represents the SCAG land use forecast for growth from buildout of the Moreno Valley General Plan in year 2040.

Land Use	2012 Base Year	2018 Baseline	2040 Existing GP	2018-2040 EXGP Delta	2040 Proposed GP	2018-2040 PGP Delta
Population	194,669	195,177	256,600	61,423	252,179	57,002
Household <sup>1</sup>	51,038	52,008	72,737	20,729	72,737	20,729
Commercial/Retail Employment	21,781	25,007	35,985	10,978	32,209	7,202
Office Employment	4,084	6,090	9,543	3,453	13,625	7,535
Industrial Employment	4,968	13,326	37,708	24,382	37,503	24,177
Total Employment	30,993	44,659	83,573	38,914	83,573	38,914
SOURCE: Fehr & Peers 2021. GP = General Plan, EXGP = Existing General Plan, PGP = Proposed General Plan <sup>1</sup> Households reflect a 94 percent occupancy rate of available housing units.						

The *City of Moreno Valley Traffic Impact Preparation Guide* (June 2020) includes the following thresholds of significance:

1. A project would have a significant VMT impact if, in the Existing Plus Project scenario, its net VMT per capita (for residential projects) or per employee (for office and industrial projects) exceeds the per capita VMT for Moreno Valley. For all other uses, a net increase in VMT would be considered a significant impact.
2. If a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence. If it is not consistent with the RTP/SCS, then it would have a significant VMT impact if:
  - a. For residential projects its net VMT per capita exceeds the average VMT per capita for Moreno Valley in the RTP/SCS horizon-year.
  - b. For office and industrial projects its net VMT per employee exceeds the average VMT per employee for Moreno Valley in the RTP/SCS horizon year
  - c. For all other land development project types, a net increase in VMT in the RTP/SCS horizon-year would be considered a significant impact.

The *City of Moreno Valley Traffic Impact Preparation Guide* notes that the Cumulative No Project scenario shall reflect the adopted RTP/SCS. Therefore, if a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence.

As these thresholds were not intended to specifically address the appropriate methodology and metric for a general plan, the following thresholds of significance are used to evaluate the 2021 GPU:

1. Any increase in the VMT per Service Population/Resident/Employee calculated using the Boundary Method, Production/Attraction Method, or Origin/Destination method compared to the Existing Baseline would be considered a significant impact.
2. Any increase in the total VMT or VMT per Service Population/Resident/Employee calculated using the Boundary Method, Production/Attraction Method, or Origin/Destination method compared to the Existing General Plan would be considered a significant impact.

VMT can be presented as total VMT or as VMT per service population, resident, or employee. Total VMT represents all VMT generated in the city on a typical day, while VMT per service population, resident, or employee is an efficiency metric that represents VMT generated on a typical day per person who lives and/or works in the City. VMT per person can be measured as VMT per resident for residential only projects, VMT per employee for employment only projects, and VMT per service population for projects and land use plans which include both residential and employment uses. Total VMT gives an estimate of the total travel, while VMT per person measures the efficiency of travel. Total VMT and VMT per person estimates were calculated using the three methodologies described below.

**Production/Attraction VMT:** The Production/Attraction (PA) method for calculating VMT sums all weekday VMT generated by trips with at least one trip end in the study area and while trips are still tracked by trip purpose. The PA method tracks trips with at least one trip end to/from their ultimate destination unless that destination is outside of the model boundary area (e.g., outside of the SCAG region). Productions are land use types that generate trips (residences) and attractions are land use types that attract trips (employment). Productions and attractions are converted from person trips to vehicle trips for the purposes of calculating VMT.

The PA method allows project VMT to be evaluated based on trip purpose which is consistent with Office of Planning and Research (OPR) recommendations in the Technical Advisory and the City's guidelines. For example, a single-use project such as an office building could be analyzed based only on the commute VMT, or home-based-work attraction (HBWA) VMT per employee, and a residential project could be analyzed based on the home-based production (HBP) VMT per resident. PA matrices do not include external trips that have one trip end outside of the model boundary (IX-XI trips) or truck trips, and therefore do not include those trips in the VMT estimates. This is not consistent with the OPR recommendations that suggest full accounting of VMT should be completed.

**Origin/Destination VMT:** The Origin/Destination (OD) method for calculating VMT sums all weekday VMT generated by trips with at least one trip end in the study area and tracks those trips to their estimated origins/destinations. The OD method is completed after the final loops of assignment in the travel demand model after person trips are converted to total vehicle trips. Origins are all vehicle trips that start in a specific traffic analysis zone, and destinations are all vehicle trips that end in a specific traffic analysis zone.

The OD method accounts for external and truck trips and therefore provides a more complete estimate of all VMT within the study area. This methodology also estimates VMT consistent with VMT estimates in air quality, noise, and energy sections of an EIR. Unfortunately, OD trip matrices do not separate trips by trip purpose, and therefore VMT cannot be calculated by HBWA VMT per employee or HBP VMT per resident, but only by total VMT. It should also be noted that, although VMT includes trips to/from the City that originate or are destined to locations outside of the model area, those trip lengths are artificially truncated at the model boundary.

**Boundary Method VMT:** The boundary method is the sum of all weekday VMT on a roadway network within a designated boundary.<sup>5</sup> The boundary method estimates VMT by multiplying the number of trips on each roadway segment by the length of that segment. This approach includes all trips, including those trips that do not begin or end in the designated boundary and is another way to summarize VMT. This is the only VMT method that captures the effect of cut-through and/or displaced traffic. The boundaries utilized in the assessment below is the City boundary and Western Riverside Council of Governments boundary. The two boundaries provide a focused assessment specific to Moreno Valley while also reviewing the effect of uses in at the edge of the City that may be truncated by the City boundary.

## **b. Vehicle Miles Traveled Estimates**

Table 4.16-5 presents the results of the VMT modeling described above. The bullet list below summarizes the results of the VMT modeling:

- The Total VMT, HBP VMT, and HBWA VMT generated within the city would be lower under buildout of the project compared to buildout of the existing 2006 General Plan.
- HBP VMT/resident and HBWA VMT/employee would be lower under buildout of the project compared to buildout of the existing 2006 General Plan. This indicates that the project would have a more efficient mix of jobs and households, resulting in shorter average commutes.
- HBP VMT/resident is forecast to improve with both plans as under buildout of both the project and existing 2006 General Plan compared to Existing Baseline (2018), though the reduction under buildout of both the project would be twice as large as the reduction under buildout of the existing 2006 General Plan.
- Boundary VMT would be higher under buildout of the project compared to buildout of the existing 2006 General Plan.

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<sup>5</sup>OPR recommends against using “arbitrary” boundaries such as City or County lines, however the model-wide results would include all six counties in the model. The addition of a single project in such a large area would be negligible. The only way to distinguish between no project and plus project results to determine the effect on VMT is to set a boundary at a scale where the effect on VMT from an individual project can be measured. Therefore, Fehr & Peers recommends the City or sub-regional level boundary would be an appropriate scale for this methodology.

All of the above findings, except the increase in Boundary VMT, show that the project would be below the thresholds of significance related to VMT, resulting in more efficient land use patterns that decrease total VMT and VMT per Service Population/Resident/Employee based on several methods. The one exception is the increase in Boundary VMT under buildout of the project, including the amount of cut through traffic that bypasses the city. It should be noted that the Boundary VMT estimates under buildout of both the project and existing 2006 General Plan are within 0.09 to 0.66 percent of each other, which is within the default 1 percent convergence criteria programmed in the traffic model runs. This implies that the differences in the estimates could be attributed to “model noise,” or inherent randomness between model runs.

**Table 4.16-5  
VMT Summary**

Land Use	2012 Base Year	2018 Baseline Interpolation	2040 Existing General Plan	2040 Proposed General Plan
Population	194,669	195,177	256,600	252,179
Employment	30,993	44,659	83,573	83,573
Service Population	225,662	239,836	340,173	335,752
Total OD VMT	5,514,827	5,985,420	9,132,168	9,048,076
OD VMT/SP <sup>1</sup>	24.44	24.96	26.86	<b>26.96</b>
HBP VMT <sup>2</sup>	2,472,986	2,467,621	3,187,219	3,046,905
HBP VMT/Resident	12.70	12.64	12.42	12.08
HBWA VMT <sup>3</sup>	340,886	524,833	1,211,220	1,201,670
HBWA VMT/Employee	11.00	11.75	14.51	<b>14.40</b>
City Boundary VMT <sup>4</sup>	1,686,559	1,844,892	2,888,203	<b>2,907,283</b>
City Boundary VMT/SP	7.47	7.69	8.49	<b>8.66</b>
WRCOG Boundary VMT	37,762,840	43,066,465	64,353,390	64,296,920
WRCOG Boundary VMT/SP <sup>5</sup>	16.73	17.15	18.71	<b>18.72</b>

SOURCE: Fehr & Peers 2021.

NOTE: Items identified in **bold** are higher than either 2018 Baseline or 2040 Existing General Plan.

<sup>1</sup>SP = Service Population; the sum of population and employment.

<sup>2</sup>HBP VMT = Home-based production VMT; VMT generated by trips originating or ending at homes in Moreno Valley.

<sup>3</sup>HBWA = Home-based-work attraction VMT; VMT generated by trips originating or ending at employment centers in Moreno Valley.

<sup>4</sup>The boundary method VMT estimated for Existing General Plan and Proposed General Plan are within 1%, which could be a function of model noise related to the default convergence criteria (0.01) in RIVTAM.

<sup>5</sup>Land use assumptions for WRCOG are provided as Attachment B.

The VMT Memo reached the following conclusions based on the results of the VMT modeling described above:

- OD VMT/SP would be higher under buildout of the project compared to buildout of the existing 2006 General Plan.
- OD VMT/SP under buildout of the project (2040) would increase compared to existing baseline (2018).

- HBWA VMT/Emp under buildout of the project (2040) would increase compared to existing baseline (2018).
- Boundary VMT and Boundary VMT/SP would be higher under buildout of the project compared to buildout of the existing 2006 General Plan.

The modeling results and conclusions described above do not include any VMT reduction associated with TDM policies and actions under goals C-2 and C-3 of the 2021 GPU Circulation Element described in Section 4.16.5.1 above, or the TDM policies and actions under goals C-4 and C-5 of the 2021 GPU Circulation Element described in Section 4.16.5.3 below. However, it is not anticipated that VMT reductions associated with proposed TDM measures would be large enough to guarantee that significant impacts could be fully mitigated. Based on the increase in OD VMT/SP, HBWA VMT/Employee, City Boundary VMT, City Boundary VMT/SP, and WRCOG Boundary VMT/SP, shown in bold in Table 4.16-5, implementation of the project would exceed the established thresholds of significance. Therefore, projected VMT generated under buildout of the project would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This would be considered a significant impact.

### **4.16.5.3 Topic 3: Hazards Due to a Design Feature**

*Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

The 2021 GPU includes policies and actions described above that would ensure future transportation facilities would not introduce hazards onto the circulation network. Policy C.2-5 would prohibit points of access from conflicting with other existing or planned access points and require points of access to roadways to be separated sufficiently to maintain capacity, efficiency, and safety of the traffic flow. Action C.2-H would evaluate opportunities to implement roundabouts as traffic control as new development projects are proposed, considering safety, traffic calming, cost, maintenance and greenhouse gas reduction related to idling. Future development and redevelopment would also be subject to applicable City road standards and would be designed consistent with all safety requirements pertaining ingress and egress onto the circulation network. Therefore, the project would not substantially increase hazards, and impacts would be less than significant.

### **4.16.5.4 Topic 4: Emergency Access**

*Would the project result in inadequate emergency access?*

As described in Section 4.9.5.6 above, the City adopted its Local Hazard Mitigation Plan (LHMP) on October 4, 2011 (revised 2017). The LHMP contains a map of emergency evacuation routes in the community that includes I-215, SR-60, and major roadways through the city. The evaluation network consists of 129 miles of roadway designated as potential evacuation routes in the event of disaster, including 34 bridges and 127 water crossings. Evacuation times could be improved with the implementation of technological and design strategies. For example, where appropriate, the use of painted medians instead of raised medians on roadways in areas of highest risk would effectively allow for reversible lanes that

create additional outbound capacity, unless required to be installed by City Standard Plans. Application of this strategy would approximately double evacuation capacity in the northwestern portion of the city. Further, remote control of signal timing from the City's Traffic Management Center (TMC) allows for real-time modifications to signal timing that can speed evacuation in the event of emergency. Approximately half of the traffic signals in the city are currently connected to the TMC, and the 2021 GPU provides for the implementation of this technology in vulnerable areas as a priority going forward. The 2021 GPU also includes policies that provide for exploration of additional actions to facilitate emergency evacuation, including the study of improved roadway connections, including Morton Road/Gernert Road in unincorporated Riverside County to the west of Moreno Valley.

Future development would be designed, constructed, and maintained in accordance with applicable standards associated with the LHMP, including vehicular access to ensure that adequate emergency access and evacuation would be maintained. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. Moreover, future development would be required to adhere to the policies included in the 2021 GPU Safety Element described in Section 4.9.5.6 above. Additionally, the 2021 Circulation Element identifies roadway improvements that would increase traffic capacity, and thereby ensure that the roadway network would be capable of accommodating traffic flows during emergency response and emergency evacuation. Therefore, adherence to applicable LHMP standards and 2021 GPU Safety Element policies, as well as increased traffic capacity in the proposed roadway network, would ensure that the project would not result in inadequate emergency access, and impacts would be less than significant.

### **4.16.6 Cumulative Analysis**

The impact analysis described above is cumulative in nature. The 2021 GPU Circulation Element provides a comprehensive framework that would improve the circulation network through project buildout in 2040. This would include implementing roadway and circulation improvements, new bicycle and pedestrian facilities, improving access to public transit, and utilizing ITS to improve the circulation network. The 2021 GPU includes policies and actions described above that would ensure future transportation facilities would not introduce hazards onto the circulation network, and future development and redevelopment would also be designed consistent with all safety requirements pertaining ingress and egress onto the circulation network. Adherence to applicable LHMP standards and 2021 GPU Safety Element policies, as well as increased traffic capacity in the proposed roadway network, would ensure that the adequate emergency access would be available for the Planning Area. The VMT analysis presented in Section 4.16.5.2 above evaluated future conditions for the entire Planning Area, and therefore was cumulative in nature. Significant impacts related to VMT were identified in Section 4.16.5.2 above, and it is not anticipated that VMT reductions associated with proposed TDM measures would be large enough to guarantee that significant impacts could be fully mitigated. Therefore, projected VMT generated under buildout of the project would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and the project would result in cumulative impacts related to VMT.

## 4.16.7 Significance of Impacts before Mitigation

### 4.16.7.1 Topic 1: Circulation System

The project would implement roadway and circulation improvements, new bicycle and pedestrian facilities, as well as the policies and actions listed under goals C-1 through C-3 in order to improve the circulation network through project buildout in 2040. Therefore, the project would not conflict with a plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant.

### 4.16.7.2 Topic 2: Vehicle Miles Traveled

Compared to the existing 2006 General Plan, implementation of the project would result in lower VMT using several metrics, demonstrating a land use plan that would increase per capita VMT efficiency. However, some metrics showed an increase in VMT based on several metrics (shown in bold in Table 4.16-5). As a result of some metrics that exceeded the significance criteria based on certain analysis methodology, impacts would be significant. The project includes TDM goals, policies, and actions that would support VMT reductions; however, anticipated VMT reductions associated with proposed TDM measures would not be large enough to guarantee that significant impacts could be fully mitigated. Therefore, projected VMT generated under buildout of the project would be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This would be considered a significant impact.

### 4.16.7.3 Topic 3: Hazards Due to a Design Feature

The 2021 GPU includes policies and actions described above that would ensure future transportation facilities would not introduce hazards onto the circulation network, and future development and redevelopment would also be designed consistent with all safety requirements pertaining to ingress and egress onto the circulation network. Therefore, the project would not substantially increase hazards, and impacts would be less than significant.

### 4.16.7.4 Topic 4: Emergency Access

Adherence to applicable LHMP standards and 2021 GPU Safety Element policies, as well as increased traffic capacity in the proposed roadway network, would ensure that the project would not result in inadequate emergency access, and impacts would be less than significant.

## 4.16.8 Mitigation

### 4.16.8.1 Topic 1: Circulation System

Impacts would be less than significant. No mitigation is required.



### **4.16.8.2 Topic 2: Vehicle Miles Traveled**

The project has incorporated VMT reducing goals and policies to the extent feasible. No additional mitigation was identified that could reduce VMT impacts. Therefore, impacts would remain significant and unavoidable.

### **4.16.8.3 Topic 3: Hazards Due to a Design Feature**

Impacts would be less than significant. No mitigation is required.

### **4.16.8.4 Topic 4: Emergency Access**

Impacts would be less than significant. No mitigation is required.

## **4.16.9 Significance of Impacts after Mitigation**

### **4.16.9.1 Topic 1: Circulation System**

Impacts would be less than significant. No mitigation is required.

### **4.16.9.2 Topic 2: Vehicle Miles Traveled**

Impacts would be significant and unavoidable.

### **4.16.9.3 Topic 3: Hazards Due to a Design Feature**

Impacts would be less than significant. No mitigation is required.

### **4.16.9.4 Topic 4: Emergency Access**

Impacts would be less than significant. No mitigation is required.

## 4.17 Utilities and Service System

This section analyzes the utilities and service system impacts that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area. This analysis relies on secondary sources, regional infrastructure planning documents.

### 4.17.1 Existing Conditions

#### 4.17.1.1 Water Service

Water service in the Planning Area is provided by two agencies: Eastern Municipal Water District (EMWD) supplies most of the city, except for a 430-acre area in the western portion of the city that is served by Box Springs Mutual Water Company.

##### **a. Metropolitan Water District of Southern California**

Metropolitan Water District of Southern California (MWD) supplies water to approximately 18.7 million people in a 5,200-square-mile service area that includes portions of Ventura, Los Angeles, Orange, San Bernardino, Riverside, and San Diego counties. MWD provides water to the EMWD, which in turn provides water supply to the city (see the discussion of EMWD below).

MWD gets its water from two sources. The first source is the Colorado River, which is connected to MWD's six-county service area through a 242-mile aqueduct, known as the Colorado River Aqueduct (CRA). The CRA system is known as the Central Valley Project, which is operated by the U.S. Bureau of Reclamation and began to deliver water to member agencies beginning in 1941. The second source is water from northern California, which supplies water through a series of dams, aqueducts, pipelines, and other facilities known as the State Water Project (SWP) and is operated by the Department of Water Resources. SWP water deliveries began in 1972.

In June 2016, MWD adopted its 2015 Regional Urban Water Management Plan (UWMP), which evaluated water supply reliability, over a 20-year period, for average, single-dry, and multiple-dry years within its service area. The plan includes estimates of total retail demands for the region and identifies the supplies needed to meet projected demands. MWD's reliability assessment showed that reliable water supplies are available to meet projected demands through the year 2040. The UWMP also identifies a planning buffer supply intended to protect against the risks associated with implementation of local and imported

water supply projects and programs, and for the risk that future demands could be higher than projected. MWD's planning buffer identifies an additional increment of water that potentially could be developed when needed and if other supplies are not fully implemented as planned. As part of the implementation of the planning buffer, MWD periodically evaluates water supply development, supply conditions, and projected demands to ensure that the region is not under or over developing supplies.

### **b. Eastern Municipal Water District**

EMWD imports water from MWD that it uses to provide water supply to the city. The imported water received from MWD is treated at two treatment plants: Henry J. Mills (Mills) in Riverside and Robert A. Skinner (Skinner) in Winchester. At Mills, SWP water is treated, while at Skinner a combination of SWP water and CRA water is treated. Untreated water supplied by MWD is treated by EMWD at a microfiltration plant in Perris. An additional microfiltration plant is located in Hemet, which provides untreated MWD water directly to a number of agricultural and wholesale customers. EMWD is increasing the use of recycled water, through expansion and maximization of the four regional water reclamation facilities.

### **c. Box Springs Mutual Water Company**

Box Springs Mutual Water Company (BSMWC) provides water service to 600 business and residential customers in a 430-acre area in the western portion of the city that includes the Edgemont neighborhood. BSMWC is a private shareholder company owned by 2,300 property owners that has provided potable water since 1920. BSMWC water supply is primarily from a groundwater well located in the area, although supplemental water is provided through an agreement with the Western Municipal Water District (WMWD). The well water is high in nitrates and to meet safe drinking water standards, BSMWC must blend its supply with more costly water imported from WMWD.

BSMWC water system facilities, which include undersized and unlined pipes, are currently hydraulically incapable of supplying the necessary fire flow demand to support existing property development conditions. Additionally, the water system is aging and deteriorated and in need of replacement and rehabilitation. A January 2014 test of fire hydrants found that 46 percent failed to meet the minimum water flow needed for fire protection. Improving the water system could cost between \$16.5 million and \$22 million, depending on whether it continued to depend on the well and blend it with imported water or switched entirely to imported water. BSMWC has replaced some pipes in its service area and a recently approved apartment complex will generate approximately \$600,000 in fees for further improvements; however, as BSMWC is a private company, it is not eligible to receive state grants. Funding remains a significant challenge.

#### **4.17.1.2 Wastewater Service**

Wastewater service in the Planning Area is provided by two agencies: EMWD provides collection and treatment for most of the city, while the Edgemont Community Services

District serves a 430-acre area in the western portion of the city that includes the Edgemont neighborhood.

#### **a. Eastern Municipal Water District**

EMWD is responsible for all wastewater collection and treatment in its service area. EMWD's wastewater collection systems include: 1,534 miles of gravity sewer, 53 lift stations, and 4 operational regional water reclamation facilities (RWRFs), with interconnections between local collection systems serving each treatment plant. Inter-connections between the local collections systems serving each treatment plant allow for operational flexibility, improved reliability, and expanded deliveries of recycled water. All of EMWD's RWRFs produce tertiary effluent, suitable for all Department of Health Services permitted uses, including irrigation of food crops and full-body contact.

EMWD treats all of the wastewater collected in its service area to tertiary standards and disposes of its recycled water in one of three ways: (1) customer sales, (2) discharge to Temescal Creek, or (3) percolation and evaporation while stored in ponds throughout EMWD. In 2015, EMWD collected 48,665 acre-feet of wastewater, treated 45,385 acre-feet of wastewater, and recycled 34,001 acre-feet of wastewater within its service area. The total wastewater collected differs from the total amount treated due to losses in the treatment process. In addition, the balance between the total wastewater treated and the amount recycled within a service area represents EMWD's system losses, such as storage pond evaporation and incidental recharge.

#### **b. Edgemont Community Services District**

The Edgemont Community Services District (ECSD) has provided sewer and street lighting to the community of Edgemont within the cities of Riverside and Moreno Valley since 1957. Within Moreno Valley, Edgemont encompasses approximately 430 acres, generally located north of Alessandro Boulevard, east of Interstate 215 (I-215), south of Eucalyptus Avenue, and west of Elsworth Street. The ECSD Sewer System Management Plan (SSMP) Update (2016) was an update to the District's 1995 ECSD Sewer Report. SSMPs must be self audited at least every two years and updated every five years from the original adoption date by the enrollee's governing board.

#### **4.17.1.3 Stormwater**

As described in Section 4.10.1.2, the local storm water conveyance system is designed to prevent flooding by transporting water away from developed areas. The Riverside County Flood Control District and Water Conservation District (RCFC&WCD) is the county agency responsible for keeping county residents safe from flood hazards. While RCFC&WCD oversees all aspects of flood protection, they collaborate with local agencies on project development and implementation. RCFC&WCD has prepared four master drainage plans (MDPs) (Sunnymead Area, West End, Perris Valley, and Moreno), that identify the range of public and private improvements required to contain the 100-year frequency storm water flows, alleviating flooding once implemented. Additionally, RCFC&WCD has developed three

area drainage plans (ADPs) that establish the fee required within each specific area to support the required improvements. The Moreno, Sunnymead, and West End MDPs have been adopted by the City. Figure 4.10-2 in Section 4.10 of this Environmental Impact Report (EIR) presents the existing storm drain facilities within the Planning Area.

#### **4.17.1.4 Electrical Power**

Southern California Edison (SCE) and the Moreno Valley Electric Utility (MVU) provide electricity to the Planning Area. SCE, a subsidiary of Edison International, serves approximately 180 cities in 11 counties across central and southern California. Today SCE has over 6,500 residential and business clients in a service area that covers the eastern and southern portions of the city.

MVU was established in 2001 as a public power utility, first serving customers in the Promontory Park subdivision at Cactus Avenue and Moreno Beach Drive. MVU serves over 6,500 customers within its service area. MVU provides customer service, meter reading, billing, emergency response, and other services to new commercial and residential developments located within its service area. MVU also provides energy for public vehicle charging stations in the city, including public charging stations located at City Hall and the Walmart Super Center. In 2014, the Moreno Valley City Council formed a Utilities Commission to provide additional review for all matters pertaining to MVU. Commissioners are citizen volunteers, appointed by the City Council for three-year terms.

#### **4.17.1.5 Natural Gas**

SoCalGas provides the city with natural gas service. SoCalGas' service territory encompasses approximately 20,000 square miles and more than 500 communities.

#### **4.17.1.6 Solid Waste**

The City provides trash, recycling, and special waste handling services to residents and businesses through a contract with Waste Management. No other haulers are authorized to operate within the city. The majority of solid waste generated within the city is disposed of at Badlands Sanitary Landfill, located north of State Route 60 (SR-60) and west of I-10 off Ironwood Avenue. Two other landfills within the county of Riverside, El Sobrante Landfill and Lamb Canyon Landfill, have the capacity to serve the city. As shown in Table 4.17-1, these three landfills have a combined remaining capacity of approximately 178.8 million cubic yards.

Landfill	Location	Current Remaining Capacity (cubic yards)
Badlands Landfill	31125 Ironwood Avenue Moreno Valley, CA	15.7 million as of January 2015
El Sobrante Landfill	10910 Dawson Canyon Road Corona, California	143.9 million as of April 2018
Lamb Canyon Landfill	16411 Lamb Canyon Road (SR-79) San Jacinto, CA	19.2 million as of January 2015
<b>TOTAL</b>		<b>178.8 million</b>
SOURCES: Dyett & Bhatia 2020a.		

## 4.17.2 Applicable Regulatory Requirements

### 4.17.2.1 Water Service

#### a. California Water Action Plan

California Water Action Plan: Actions for Reliability, Restoration and Resilience was released by Governor Brown in January 2014. A collaborative effort of the California Natural Resources Agency, the California Environmental Protection Agency, and California Department of Food and Agriculture, the California Water Action Plan was developed to meet three broad objectives: more reliable water supplies, the restoration of important species and habitat, and a more resilient, sustainably managed water resources system (water supply, water quality, flood protection, and environment) that can better withstand inevitable and unforeseen pressures in the coming decades.

For the past five years, and continuing into the future, the following actions are designed to move California toward more sustainable water management by providing a more reliable water supply for farms and communities, restoring important wildlife habitat and species, and helping the state's water systems and environment become more resilient:

1. Make conservation a California way of life;
2. Increase regional self-reliance and integrated water management across all levels of government;
3. Achieve the co-equal goals for the Delta;
4. Protect and restore important ecosystems;
5. Manage and prepare for dry periods;
6. Expand water storage capacity and improve groundwater management;
7. Provide safe water for all communities;
8. Increase flood protection;
9. Increase operational and regulatory efficiency; and
10. Identify sustainable and integrated financing opportunities.

## **b. Water Shortage Contingency Plan (Title 5, Article 10 EMWD Administrative Code)**

In accordance with Water Code 10632 requirements, EMWD is responsible for conserving the available water supply, protecting the integrity of water supply facilities, and implementing a contingency plan in times of drought, supply reductions, failure of water distribution systems, or emergencies.

Therefore, EMWD adopted the Water Shortage Contingency Plan to regulate the delivery and consumption of water use during water shortages. EMWD's Board of Directors has the authority to initiate or terminate the water shortage contingency measures described in the Water Shortage Contingency Plan.

EMWD will implement the appropriate Water Shortage Contingency Plan stage based on current water conditions such as:

- EMWD water supply conditions and storage levels
- Statewide water supply conditions
- Local water supply and demand conditions
- MWD Water Supply Allocation Plan implementation or other actions requiring a reduction in water demand
- Actions by surrounding agencies

Higher stages will be implemented as shortages continue and/or if customer response does not bring about desired water savings. Restrictions, penalties, and enforcement will build on each other as higher stages are implemented. The stages are: Stage 1, Supply Watch; Stage 2: Supply Alert (currently in Stage 2); Stage 3, Mandatory Waste Reduction; Stage 4, Mandatory Outdoor Reduction; and Stage 5, Mandatory Indoor Reduction.

## **c. Urban Water Management Planning Act**

In 1983, the California legislature enacted the Urban Water Management Planning Act (California Water Code, Sections 10610–10656), which requires specified urban water suppliers within the state to prepare an UWMP and update it every five years. State and local agencies and the public frequently use UWMPs to determine if agencies are planning adequately to reliably meet water demands in various service areas. As such, UWMPs serve as an important role in documenting water supply availability and reliability for purposes of compliance with Senate Bills 610 and 221, which link water supply sufficiency to large land-use development project approvals. Urban water suppliers also must prepare UWMPs, pursuant to the Urban Water Management Planning Act, in order to be eligible for state funding and drought assistance.

A UWMP provides information on water usage, water supply sources, and water reliability planning within a specified water agency service area. It also may provide implementation schedules to meet projected demands over the planning horizon; a description of

opportunities for new development of desalinated water; groundwater information (where groundwater is identified as an existing or planned water source); description of water quality over the planning horizon; and identification of water management tools that maximize local resources and minimize imported water supplies. Additionally, a UWMP evaluates the reliability of water supplies within the specified service area. This includes a water supply reliability assessment, water shortage contingency plan, and development of a plan in case of an interruption of water supplies.

#### **d. Eastern Municipal Water District Water Conservation Policies**

EMWD's water conservation policies, practices, and procedures were originally adopted in 1991, and have been periodically modified to provide long-term water reliability for existing and future customers (EMWD 2013). EMWD water conservation policies include the following:

1. Hosing down driveways and other hard surfaces is prohibited except for health or sanitary reasons.
2. Repair water leaks within 48 hours of occurrence.
3. Irrigate landscape only between 9:00 p.m. and 6:00 a.m. except when:
  - manually watering;
  - establishing new landscape;
  - temperatures are predicted to fall below freezing; or
  - it is for very short periods of time to adjust or repair an irrigation system.
4. Unattended irrigation systems using potable water are prohibited unless they are limited to no more than 15 minutes watering per day, per station. This limitation can be extended for:
  - Very low flow drip irrigation systems when no emitter produces more than two gallons of water per hour.
  - Weather based controllers or stream rotor sprinklers that meet 70 percent efficiency.
  - Runoff or over watering is not permitted in any case.
5. Irrigation systems operate efficiently and avoid over watering or watering of hardscape and the resulting runoff.
6. Excessive water flow or runoff is prohibited.
7. Decorative fountains must be equipped with a recycling system.
8. Allowing water to run while washing vehicles is prohibited.



9. Install new landscaping with low-water demand trees and plants. New turf shall only be installed for functional purposes.
10. Watering during rain is prohibited.

### **4.17.2.2 Wastewater Service**

#### **a. State Water Resources Control Board**

The State Water Resources Control Board (SWRCB) preserves, enhances, and restores the quality of California's water resources, and ensures the proper allocation and efficient use for the benefit of present and future generations. Wastewater generators must obtain a permit to discharge their wastewater. Pursuant to the federal Clean Water Act and California's Porter-Cologne Water Quality Control Act, the SWRCB regulates wastewater discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. Some wastewater discharges are exempt from federal NPDES requirements, but California law may still apply. Under California law, the SWRCB requires Waste Discharge Requirements for some discharges in addition to those subject to NPDES permits. Permits contain specific requirements that limit the pollutants in discharges. They also require dischargers to monitor their wastewater to ensure that it meets all requirements. Wastewater dischargers must maintain their treatment facilities, and treatment plant operators must be certified. The SWRCB routinely inspects treatment facilities and strictly enforces permit requirements.

#### **b. Recycled Water Policy Resolution No. 2009-0011**

The purpose of the Recycled Water Policy is to increase the use of recycled water from municipal wastewater sources that meets the definition in Water Code Section 13050(n), in a manner that implements state and federal water quality laws. When used in compliance with the policy, Title 22, and all applicable state and federal water quality laws, the SWRCB finds that recycled water is safe for the approved uses, and strongly supports recycled water as a safe alternative to potable water for such approved uses.

### **4.17.2.3 Stormwater**

As described in Section 4.10.2.3.f, the RCFC&WCD is the county agency responsible for keeping county residents safe from flood hazards. The duties of the RCFC&WCD include the following:

- Identification of flood hazards and problems;
- Regulation of floodplains and development;
- Regulation of drainage and development;
- County watercourse and drainage planning;
- Education for flood prevention and safety;
- Construction of flood control structures and facilities;
- Flood warning and early detection; and
- Maintenance and operation of completed structures.

The RCFC&WCD is funded through a share of property taxes in addition to other funding sources. As a special district, the RCFC&WCD's jurisdiction extends over the western 40 percent of Riverside County.

#### **4.17.2.4 Solid Waste**

##### **a. California Integrated Waste Management Act**

Assembly Bill (AB) 939, known as the California Integrated Waste Management Act of 1989, required all California cities and counties to divert 50 percent of the waste generated within their boundaries by the year 2000. The act requires each California city and county to prepare, adopt, and submit to the California Department of Resources Recycling and Recovery (CalRecycle), a Source Reduction and Recycling Element (SRRE) that demonstrates how the jurisdiction will meet the California Integrated Waste Management Act's mandated diversion goals. Each jurisdiction's SRRE must include specific components, as defined in California Public Resources Code Sections 41003 and 41303. Additionally, the SRRE must include a program for the management of solid waste generated in the jurisdiction consistent with the following hierarchy: (1) source reduction, (2) recycling and composting, (3) environmentally safe transformation; and (4) land disposal.

##### **b. Assembly Bill 1826**

AB 1826 (2014) requires businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate on a weekly basis. Additionally, AB 1826 requires that, after January 1, 2016, all local jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings with five or more units. Organic waste includes food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste that is mixed in with food waste. This law phases in the mandatory recycling of commercial organics over time.

Because the minimum threshold of organic waste generation by businesses will be decreased over time (e.g., in 2016, affected businesses were those generating 8 cubic yards or more of organic waste per week; in 2019, affected businesses will be those generating 4 or more cubic yards of organic waste per week), an increasing proportion of the commercial sector will be required to comply. AB 1826 is part of California's efforts intended to achieve its recycling and greenhouse gas emissions reduction goals. Reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch are part of the AB 32 Scoping Plan.

##### **c. Senate Bill 1383**

Senate Bill (SB) 1383 (2016) requires a 50 percent reduction in disposal of organic waste from the 2014 level by 2020, and a 75 percent reduction by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible

food is recovered for human consumption by 2025. Food waste alone accounts for approximately 17 percent to 18 percent of total landfill disposal. Increasing food waste prevention, encouraging edible food rescue, and expanding the composting and in-vessel digestion of organic waste throughout the state will help reduce methane emissions from organic waste disposed in California's landfills. Additionally, compost has numerous benefits including water conservation, improved soil health, and carbon sequestration.

#### **d. Moreno Valley Municipal Code**

The City's Municipal Code Ordinance 6.02.050 provides standards for the provision of solid waste (refuse) and recyclable material storage areas in compliance with state law (California Solid Waste Reuse and Recycling Access Act, Public Resources Code Sections 42900 through 42911). Additionally, the City's Building Code requires development projects to complete and submit a Waste Management and Recycling Plan for approval prior to issuance of building permits. The Waste Management and Recycling Plan would identify the project type, and estimate the amount of materials to be recycled during construction. The project would also be required to complete a Diversion Report for review by the City's Building Department to demonstrate that the project recycled a minimum of 50 percent of its construction waste.

### **4.17.3 Methodologies for Determining Impacts**

The potential for significant impacts associated with the proposed GPU has been determined based upon review of existing secondary source information.

### **4.17.4 Basis for Determining Significance**

Thresholds used to evaluate impacts related to utilities and service system are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. A significant impact would occur if the project would:

- 1) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
- 2) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
- 3) 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;
- 4) 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; or

- 5) Comply with federal, state, or local management and reduction statutes and regulations related to solid waste.

## 4.17.5 Impact Analysis

### 4.17.5.1 Topic 1: Utility Infrastructure

*Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

#### a. Water

As described in Section 3.2.4 above, buildout of the project would generate an increase of approximately 43,882 people, 22,052 new homes, 38,915 jobs by 2040, which would necessitate construction of future water supply infrastructure. This increased demand for water infrastructure would primarily be located within the Concept Areas. Due to the increased growth within the Concept Areas, the existing water conveyance system likely would not be adequate to provide a reliable water supply. Therefore, pipeline upgrades, as well as new storage tanks, would likely be required to serve development and redevelopment within the Concept Areas. Additionally, future growth outside of the Concept Areas would also need water infrastructure improvements to serve future growth through 2040.

Construction of the future water facilities described above could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future water facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new water facilities. Furthermore, these future water facilities would be subject to 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the relocation or construction of new or expanded water facilities to a level less than significant.

#### b. Wastewater

As described in Section 3.2.4 above, buildout of the project would generate an increase of approximately 43,882 people, 22,052 new homes, 38,915 jobs by 2040, which would necessitate construction of future wastewater infrastructure. This increased demand for wastewater infrastructure would primarily be located within the Concept Areas. The increased wastewater flow generated by the Concept Areas would likely require upsizing existing collection sewer lines and existing conveyance sewer lines to wastewater treatment plants, in addition to extension of sewer lines in existing unserved areas north of SR-60. Additionally, future growth outside of the Concept Areas would also need water infrastructure improvements to serve future growth through 2040.

Construction of the future wastewater facilities described above could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future wastewater facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new wastewater facilities. Furthermore, these future wastewater facilities would be subject to 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the relocation or construction of new or expanded wastewater facilities to a level less than significant.

### **c. Stormwater**

As described in Section 3.2.4 above, buildout of the project would generate an increase of approximately 43,882 people, 22,052 new homes, 38,915 jobs by 2040, which would necessitate construction of future stormwater infrastructure such as underground storm drains, open channels, and detention basins. The 2021 GPU currently envisions that proposed drainage facilities would consist either of new facilities or extensions of existing drainage facilities. The 2021 GPU currently does not envision upsizing existing drainage facilities or introducing drainage facilities parallel to existing drainage facilities. Any future storm drain facilities greater than 36-inches in diameter, including all reinforced concrete boxes and detention basins, would be operated and maintained by RCFC&WCD, while all remaining facilities would be the responsibility of the City.

Construction of the future stormwater facilities described above could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future stormwater facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new stormwater facilities. Furthermore, these future stormwater facilities would be subject to 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the relocation or construction of new or expanded stormwater facilities to a level less than significant.

### **d. Electric Power, Natural Gas, and Telecommunications**

As described in Section 3.2.4 above, buildout of the project would generate an increase of approximately 43,882 people, 22,052 new homes, 38,915 jobs by 2040, which would necessitate construction of future electrical, natural gas, and telecommunications infrastructure. This increased demand would primarily be located within the Concept Areas, although future growth outside of the Concept Areas would also need infrastructure improvements to serve future growth through 2040.

Construction of the future electrical, natural gas, and telecommunications could result in environmental impacts, including disturbances or conversion of habitat, water pollution

during construction, increased noise levels, and an increase in impermeable surfaces. At the time future facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new facilities. Furthermore, these future facilities would be subject to 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the relocation or construction of new or expanded electrical, natural gas, and telecommunications facilities to a level less than significant.

#### **4.17.5.2 Topic 2: Water Supply**

*Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

In June 2016, EMWD's Board of Directors adopted the 2015 UWMP. This plan provides information on EMWD's projected supplies and demands in five-year increments through the year 2040, and reports EMWD's progress on water use efficiency targets as defined in the Water Conservation Act of 2009. As stated in the UWMP, EMWD's recycled water distribution system includes 135 miles of large diameter transmission pipelines, 6,000 acre-feet of surface storage reservoirs (10 separate sites), and 4 regional pumping plants.

As set forth in the UWMP, EMWD has the supply needed to meet the demand of its customers through 2040. The conclusion is based on the assurances of MWD that it would be able to supply member agency demands, the reliability of local groundwater supplies achieved through groundwater management plans and the development of recycled water resources.

Based on the imported and member agency local water sources discussed above, EMWD estimates that it, along with member agency local sources, would be able to supply 268,200 acre-feet of water in 2040. Therefore, the MWD 2015 Regional UWMP and EMWD 2016 UWMP adequate water supply is available to meet all of the region's anticipated demand, in average/normal and dry water years.

As described in Section 4.15.5.1 above, project buildout would result in a total of 72,737 households in 2040, which would be less than the 2040 SCAG household projection of 73,000. Similarly, the project's projected population size of 252,179 would be less than the 2040 SCAG projection of 256,600. This difference in population is due to the greater share of multi-family units that would likely result under buildout of the project compared to buildout of the existing 2006 General Plan, as multi-family units typically have a lower household population. The project would slightly increase the number of jobs to 83,246 compared to the SCAG 2040 growth projection of 83,200. However, this slight increase in approximately 46 jobs would have a negligible effect on future growth that would be offset by the decrease in population and households compared to SCAG 2040 growth projections. Consequently, the project would not exceed forecasted water demand projections for EMWD, because it would reduce future population and household growth compared to 2040 SCAG projections. Similarly, the project is not expected to exceed forecasted water demand projections for BSMWC, because it would reduce future population and household growth compared to 2040

SCAG projections. Therefore, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years, and impacts would be less than significant.

### **4.17.5.3 Topic 3: Wastewater Treatment**

*Would the project 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?*

As described in Section 4.15.5.1 above, project buildout would result in a total of 72,737 households in 2040, which would be less than the 2040 SCAG household projection of 73,000. Similarly, the project's projected population size of 252,179 would be less than the 2040 SCAG projection of 256,600. Although the project would slightly increase the number of jobs to 83,246 compared to the SCAG 2040 growth projection of 83,200, this slight increase in approximately 46 jobs would have a negligible effect on future growth that would be offset by the decrease in population and households compared to SCAG 2040 growth projections. Consequently, the project would not exceed forecasted wastewater demand projections for EMWD, because it would reduce future population and household growth compared to 2040 SCAG projections. Similarly, the project would not exceed forecasted wastewater demand projections for ECSD, because it would reduce future population and household growth compared to 2040 SCAG projections. Therefore, EMWD and ECSD would have adequate capacity to provide wastewater treatment for the project, and impacts would be less than significant.

### **4.17.5.4 Topics 4 and 5: Solid Waste**

*Would the project 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?*

*Would the project comply with federal, state, or local management and reduction statutes and regulations related to solid waste?*

As described in Section 4.17.1.6 above, the majority of solid waste generated within the city is disposed of at Badlands Sanitary Landfill. Two other landfills within the county of Riverside, El Sobrante Landfill and Lamb Canyon Landfill, have the capacity to serve the city. As shown in Table 4.17-1 above, these three landfills have a combined remaining capacity of approximately 178.8 million cubic yards. As described in Section 4.15.5.1 above, project buildout would result in a total of 72,737 households in 2040, which would be less than the 2040 SCAG household projection of 73,000. Similarly, the project's projected population size of 252,179 would be less than the 2040 SCAG projection of 256,600. Although the project would slightly increase the number of jobs to 83,246 compared to the SCAG 2040 growth projection of 83,200, this slight increase in approximately 46 jobs would have a negligible effect on future growth that would be offset by the decrease in population and households compared to SCAG 2040 growth projections. Consequently, the project would not

generate excessive solid waste that would exceed regional forecasted demand, because it would reduce future population and household growth compared to 2040 SCAG projections.

As described in Section 4.17.2.4.d above, the City's Building Code requires development projects to complete and submit a Waste Management and Recycling Plan for approval prior to issuance of building permits. The Waste Management and Recycling Plan would identify the project type, and estimate the amount of materials to be recycled during construction. The project would also be required to complete a Diversion Report for review by the City's Building Department to demonstrate that the project recycled a minimum of 50 percent of its construction waste. Future site-specific development under the project would be required to complete a Waste Management and Recycling Plan and a Diversion Plan, which would ensure consistency with local and state requirements regarding waste diversion, including the California Integrated Waste Management Act. Additionally, future site-specific development would also be required to implement organic waste recycling programs consistent with the requirements of AB 1826 and SB 1383. Therefore, the project would not generate solid waste in excess of state or local standards, exceed the capacity of local infrastructure, or conflict with federal, state, or local management and reduction statutes and regulations related to solid waste, and impacts would be less than significant.

## **4.17.6 Cumulative Analysis**

The impact analysis presented in Section 4.17.5 above was cumulative in nature because it considers the need for future facilities to serve the entire Planning Area. Construction of future utility and service system facilities could result in environmental impacts, including disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future utility and service facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new utility and service. Furthermore, these future utility and service would be subject to 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR. Therefore, the project would not contribute to a cumulative impact related to public utilities and service system.

## **4.17.7 Significance of Impacts before Mitigation**

### **4.17.7.1 Topic 1: Utility Infrastructure**

#### **a. Water**

Future water facilities would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the relocation or construction of new or expanded water facilities to a level less than significant.



**b. Wastewater**

Future wastewater facilities would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the relocation or construction of new or expanded wastewater facilities to a level less than significant.

**c. Stormwater**

Future stormwater facilities would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the relocation or construction of new or expanded stormwater facilities to a level less than significant.

**d. Electric Power, Natural Gas, and Telecommunications**

Future facilities would be subject to separate environmental review, 2021 GPU goals and policies intended to protect the environment and the programmatic mitigation framework established in this EIR, which would reduce impacts associated with the relocation or construction of new or expanded electrical, natural gas, and telecommunications facilities to a level less than significant.

**4.17.7.2 Topic 2: Water Supply**

The project would not exceed forecasted water demand projections for EMWD or BSMWC, because it would reduce future population and household growth compared to 2040 SCAG projections. Therefore, the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years, and impacts would be less than significant.

**4.17.7.3 Topic 3: Wastewater Treatment**

The project would not exceed forecasted wastewater demand projections for EMWD or ECSD, because it would reduce future population and household growth compared to 2040 SCAG projections. Therefore, EMWD and ECSD would have adequate capacity to provide wastewater treatment for the project, and impacts would be less than significant.

**4.17.7.4 Topics 4 and 5: Solid Waste**

The project would not generate excessive solid waste that would exceed regional forecasted demand, because it would reduce future population and household growth compared to 2040 SCAG projections. Future site-specific development under the project would be required to complete a Waste Management and Recycling Plan and a Diversion Plan, which would ensure consistency with local, state, and federal requirements regarding waste diversion. Therefore,

the project would not generate solid waste in excess of state or local standards, exceed the capacity of local infrastructure, or conflict with federal, state, or local management and reduction statutes and regulations related to solid waste, and impacts would be less than significant.

## **4.17.8 Mitigation**

### **4.17.8.1 Topic 1: Utility Infrastructure**

#### **a. Water**

Impacts would be less than significant. No mitigation is required.

#### **b. Wastewater**

Impacts would be less than significant. No mitigation is required.

#### **c. Stormwater**

Impacts would be less than significant. No mitigation is required.

#### **d. Electric Power, Natural Gas, and Telecommunications**

Impacts would be less than significant. No mitigation is required.

### **4.17.8.2 Topic 2: Water Supply**

Impacts would be less than significant. No mitigation is required.

### **4.17.8.3 Topic 3: Wastewater Treatment**

Impacts would be less than significant. No mitigation is required.

### **4.17.8.4 Topics 4 and 5: Solid Waste**

Impacts would be less than significant. No mitigation is required.

## **4.17.9 Significance of Impacts after Mitigation**

### **4.17.9.1 Topic 1: Utility Infrastructure**

#### **a. Water**

Impacts would be less than significant. No mitigation is required.

**b. Wastewater**

Impacts would be less than significant. No mitigation is required.

**c. Stormwater**

Impacts would be less than significant. No mitigation is required.

**d. Electric Power, Natural Gas, and Telecommunications**

Impacts would be less than significant. No mitigation is required.

**4.17.9.2 Topic 2: Water Supply**

Impacts would be less than significant. No mitigation is required.

**4.17.9.3 Topic 3: Wastewater Treatment**

Impacts would be less than significant. No mitigation is required.

**4.17.9.4 Topics 4 and 5: Solid Waste**

Impacts would be less than significant. No mitigation is required.

## 4.18 Wildfire

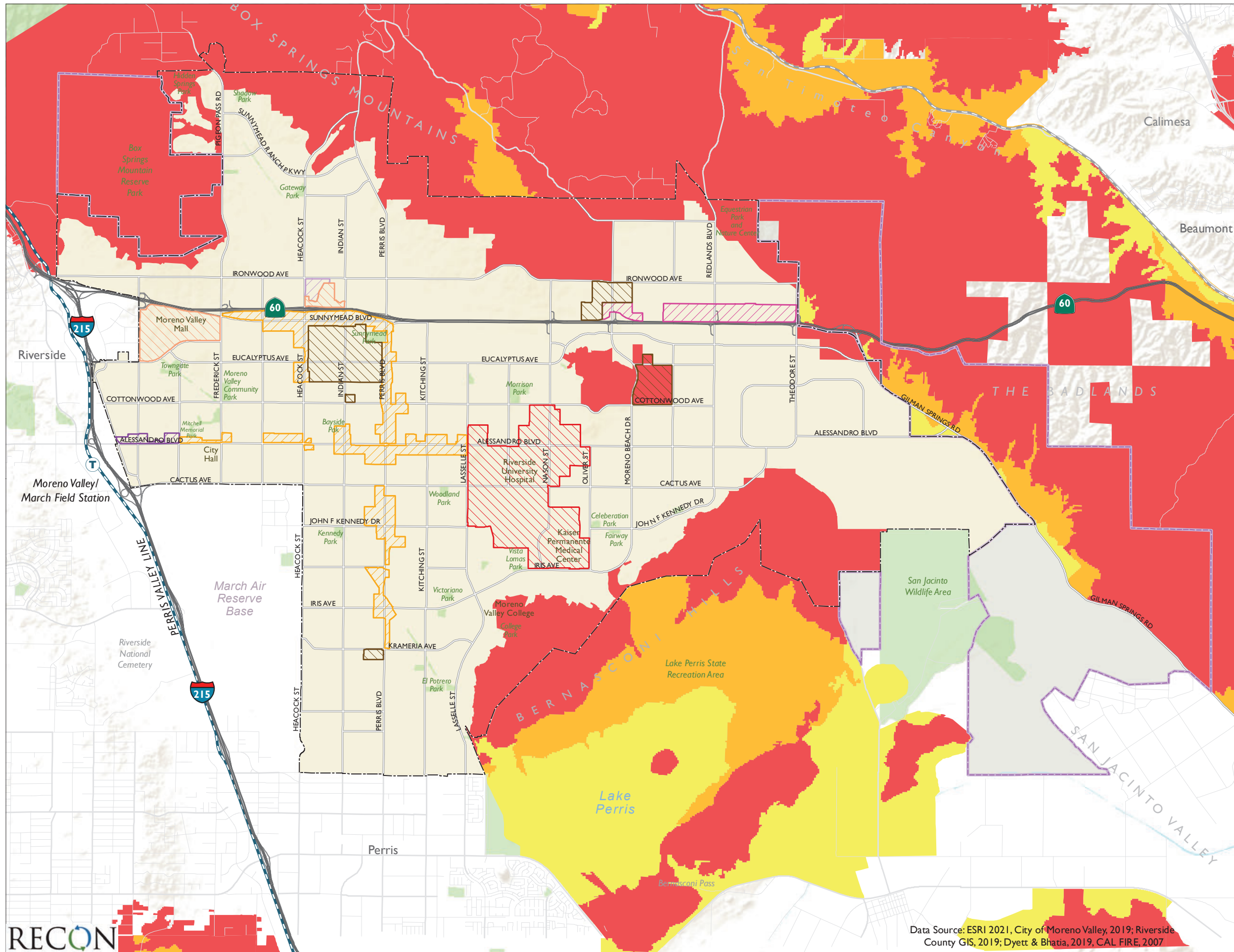
This section analyzes potentially significant impacts related to wildfire that could result from implementation of the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP). The analysis area covers the entire city of Moreno Valley (city) and sphere of influence, which are collectively referred to as the Planning Area. This analysis relies on secondary source information including but not limited to city programs and plans, and data available from the California Department of Forestry and Fire Protection (CAL FIRE) and other applicable agencies.

### 4.18.1 Existing Conditions

#### 4.18.1.1 Wildfire Hazards

Threat from wildfire hazards is determined based on a number of factors, including fuel loading (vegetation); topography; climatic conditions, such as wind, humidity, and temperature; and the proximity of structures and urban development to fire hazards. Wildland fire hazards are most pronounced in wildland-urban interface areas, or where urban development is located close to open space areas where vegetation can serve as fuel. Generally, the periods of greatest risk for wildland fire are the late summer and early fall when vegetation is at its driest. Human activity, including residential and agricultural burning, campfires, and the use of fireworks can all trigger fires. Natural causes such as lightning strikes may also start fires.

CAL FIRE has developed two datasets for fire threat and hazard mapping. The first mapping dataset consists of Fire Hazard Severity Zones (FHSZs), which were developed for community planning and real estate disclosure purposes, and are meant to help limit wildfire damage to structures through planning, prevention, and the application of risk reduction measures. The mapped areas, or “zones,” are based on factors such as fuel (e.g., flammable vegetation), slope, and fire weather. There are three zones, based on increasing fire hazard: moderate, high, and very high. As shown in Figure 4.18-1 and detailed in Table 4.18-1, the majority of the Planning Area is located in urban areas not mapped within a FHSZ. Approximately 12,283 acres of the Planning Area are mapped as Very High FHSZ (VHFHSZ).



- City of Moreno Valley
- Sphere of Influence
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes
- CalFire Fire Hazard Severity Zones**
- Moderate
- High
- Very High



**FIGURE 4.18-1**  
California Fire Hazard  
Severity Zone

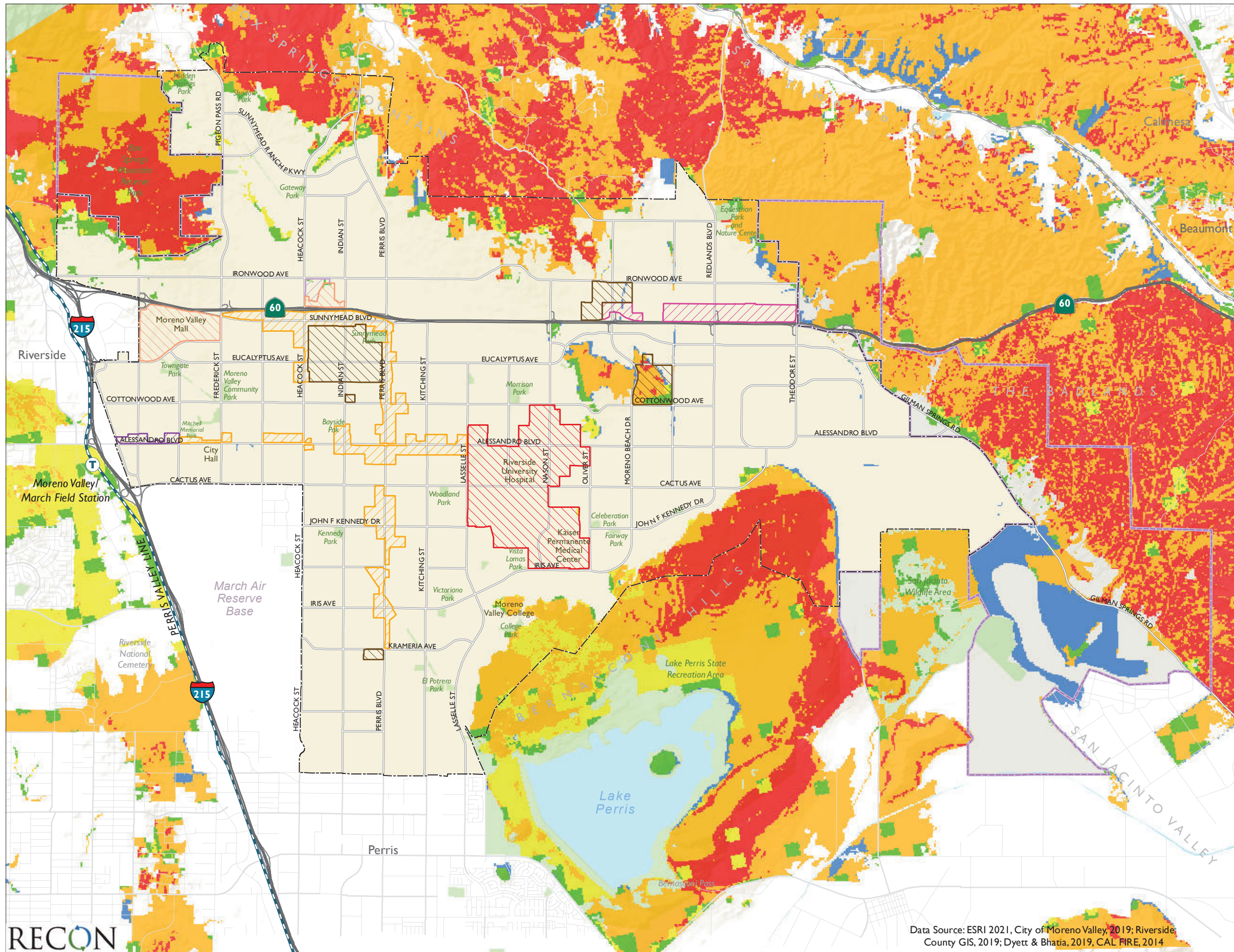
Row Labels	Acres	Percentage
Very High	12,283.37	28.62
High	614.85	1.43
Moderate	195.73	0.46
No Rating	29,823.05	69.49
<b>TOTAL</b>	<b>42,917.00</b>	<b>100.00</b>

The second CAL FIRE mapping dataset provides maps which show fire threat potential throughout California. CAL FIRE ranks fire threat based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). These two factors are combined to create a five-point scale of fire threats ranging from Low to Extreme. The fire threat for the Planning Area is shown in Figure 4.18-2. As detailed in Table 4.18-2, the majority of the Planning Area is unranked because it consists of urban development that has no wildfire potential. However, areas designated as having Extreme risk are located within, and adjacent to, the southern, eastern, and northern portions of the Planning Area. These areas also possess lands that have been designated VHFHSZ. A small central portion of the Planning Area has also been identified as having fire risk ranging from Moderate to Extreme, with the majority of this area also categorized as being within VHFHSZ. Table 4.18-2 presents the acreage of land within the Planning Area under each fire threat area classification.

Row Labels	Acres	Percentage
Extreme	4,720.20	11.00
Very High	5,004.11	11.66
High	547.60	1.28
Moderate	683.16	1.59
Low	1,074.18	2.50
No Rating	30,887.76	71.97
<b>TOTAL</b>	<b>42,917.00</b>	<b>100.00</b>

#### 4.18.1.2 History of Wildfire

The city's Local Hazard Mitigation Plan (LHMP) documented that there were 803 wildland fires within the Planning Area varying in size and impact between 2003 and 2016. Eleven of these fires that were documented in the LHMP were over 50 acres in size and are described in Table 4.18-3 below. The total incident costs for fires over 50 acres that have occurred since 2011 totals \$1,178,679.17.



- City of Moreno Valley
- Sphere of Influence
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes
- FRAP Fire Threat Areas**
- Extreme
- Very High
- High
- Moderate
- Low



**FIGURE 4.18-2**  
**CAL FIRE Fire Threat Areas**

**Table 4.18-3  
History of Fire in Moreno Valley and Surrounding Areas**

Year	Fire Description
2002	April 21, 2002 – Redlands Fire: San Timoteo east of Redlands Boulevard burned 150 acres. No damage information was available.
2003	August 18, 2003 – Locust Fire: wildfire at Redlands Boulevard, east end of Moreno Valley burned 1,600 acres with urban interface. Significant voluntary evacuations with major livestock movement. No other damage information was available.
2003	October 21, 2003 – Pass Fire: wildfire at Reche Canyon, one-half mile north of Moreno Valley burned 2,360 acres and damaged 2 single-family dwellings, 2 mobile homes, 8 outbuildings, and other structures and vehicles.
2007	March 4, 2007 – A wildfire at Gilman Springs Road and Alessandro Boulevard burned 680 acres. No damage information was available.
2009	May 27, 2009 – A wildfire at Via del Lago and Alta Calle burned 503 acres near the north entrance of Lake Perris State Recreational Area. No damage information was available.
2011	June 27, 2011 – A wildfire at Camino Real and Oliver Street burned 52 acres near the north entrance of Lake Perris State Recreational Area. No damage information was available.
2011	July 20, 2011 – A wildfire at San Timoteo Canyon Road east of Redlands Boulevard burned 71.13 acres. No damage to structure, personal property or city infrastructure. Incident cost: \$253,274.89.
2011	August 6, 2011 – A wildfire at State Route 60 at Gilman Springs Road burned 1,026 acres. No damage to structures, personal property, or city infrastructure. Incident cost: \$391,725.84.
2013	May 25, 2013 – A wildfire at Gilman Hot Springs Road east of Alessandro Boulevard burned 126.64 acres. There was no damage to structures, personal property, or city infrastructure. Incident cost: \$97,626.58.
2013	July 16, 2013 – A fire near Redlands Boulevard east of San Timoteo Canyon Road burned 168.09 acres. There was damage to two outbuildings and personal property with unknown dollar damage. Mandatory evacuations ordered. No damage to city infrastructure. Incident cost: \$99,218.15.
2015	July 1, 2015 – A wildfire at Merwin Road east of Alessandro Boulevard burned 181.43 acres. A mandatory evacuation was ordered to a residential community and a fire threat was issued to a natural animal preserve. There was city damage sustained to a City's water tower and property fence. There was no residential structure damage. Incident cost: \$336,833.71.

SOURCE: City of Moreno Valley 2017.

### 4.18.1.3 Wildfire Preparedness

#### a. Service and Response

Details of fire protection services are provided in Section 4.15.1.1 of this EIR. The following is a brief summary as it relates to wildfire preparedness. The Moreno Valley Fire Department (MVFD) is the primary response agency for fires, and provides a full range of fire prevention services including public education, code enforcement, plan check and inspection services for new and existing construction, and fire investigation. Additionally, the City's Office of Emergency Management (OEM) is located within the MVFD allowing for a well-coordinated response to both natural and human-made disasters. MVFD contracts with the Riverside County Fire Department (RCFD) and CAL FIRE for provision of services as part of an integrated fire protection system. This system ensures that the additional fire response resources are available from RCFD and surrounding jurisdictions when there is an



emergency that utilizes a majority of the city's resources. Additionally, under this integrated system, the city is able to provide fire apparatus to other local jurisdictions when they are experiencing a major incident requiring additional fire resources.

MVFD has established a target response time of 5 minutes from dispatch to arrival for 90 percent of calls for service and continues to work to meet this goal. MVFD response times were tracked manually by fire station personnel through 2008, and compliance with this goal varied from 85 percent to 99 percent, depending on the time of year and the fire station (MVFD 2011).

Existing and proposed fire stations as shown in Figure 4.15-1 presented in Section 4.15 of this EIR. The MVFD Strategic Plan outlines goals and strategies for fire protection services throughout the Planning Area, including facility needs and improvements, training requirements, such as Community Emergency Response Team (CERT), and disaster preparedness. Disaster preparedness efforts include oversight of the OEM, including maintaining the OEM in a continued state of readiness, training staff and outside agency representatives in their roles and responsibilities, and coordinating Emergency Operations Center (EOC) operations when activated in response to an emergency or major event/incident.

## **4.18.2 Applicable Regulatory Requirements**

### **4.18.2.1 Federal Regulations**

#### **a. Disaster Mitigation Act**

The Disaster Mitigation Act of 2000 requires that a state mitigation plan, as a condition of disaster assistance, add incentives for increased coordination and integration of mitigation activities at the state level through the establishment of requirements for two different levels of state plans: "Standard" and "Enhanced." The Disaster Mitigation Act also established a new requirement for local mitigation plans.

### **4.18.2.2 State Regulations**

#### **a. California Wildland-Urban Interface Code**

On September 20, 2005, the California Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending the California Building Code (CBC) (California Code of Regulations [CCR] Title 24, Part 2). Section 701A of the CBC includes regulations addressing materials and construction methods for exterior wildfire exposure and applies to new buildings located in state responsibility areas or VHFHSZs in local response areas.

## **b. California Fire Code**

The 2016 California Fire Code (CCR Title 24, Part 9) establishes regulations to safeguard against the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The Fire Code also establishes requirements intended to provide safety for and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout California. The Fire Code includes regulations regarding fire-resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire services features such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface areas. The City has adopted the California Fire Code as Title 8, Chapter 8.36 the Municipal Code, including appendices addressing fire-flow requirements for buildings.

### **4.18.2.3 Local Regulations**

#### **a. Local Hazard Mitigation Plan**

The City's LHMP (2017) is designed to identify the city's hazards, including threat of wildfire, especially for those portions of the city which are mapped within high fire hazard areas. The LHMP includes strategies for the minimization of damage from wildfires including the identification of high fire risk areas. The LHMP also contains the City's evacuation plan including the identification of evacuation centers and evacuation map.

#### **b. Emergency Operations Plan**

The City's Emergency Operations Plan (2009) identifies wildfire as a potential risk to life and property. The plan identifies areas of concern and provides a threat assessment and develops an approach to combatting wildfire, alerting and warning, shelter and mass care, donation management, volunteer management, evacuation, damage assessment, as well as preventive measures.

#### **c. Moreno Valley Fire Department Strategic Plan 2012-2022**

The Moreno Valley Fire Department Strategic Plan 2012-2022 outlines goals and strategies directed at fire operations, fire prevention, and the OEM to assist in the provision of fire protection services. Goals for the protection against wildfire include the following:

- Fire Operations
  - Financial Management and Accountability
  - Goal 2: Arrive On Scene within 5 Minutes of Dispatch 90% of the Time
  - Goal 3: Reduce the Risk of Fire to Residents through Prevention Campaigns
  - Maintain a Strong Partnership with Riverside County Fire Department
  - Ensure Fire Administration Staffing is Sufficient for the Needs of the Department

- Fire Prevention
  - Goal 1: Fiscal Sustainability
  - Goal 2: Ensure All Business and Commercial Occupancies Receive Annual Fire and Life Safety Inspections
  - Goal 3: Perform Hazard Abatement Inspections Bi-Annually
  - Goal 4: Provide Efficient Plan Review
  - Goal 5: Evaluate Management Structure and Career Advancement within the Bureau
  
- OEM
  - Goal 1: Provide Training to Employees, Businesses, and Citizens
  - Goal 2: Incorporate Federal and State Legal Mandates and Standards into City Emergency Management Strategies
  - Goal 3: Continually Improve Emergency Operations Center Functions and Capabilities Based on a Comprehensive Assessment
  - Goal 4: Manage FEMA and State Disaster Recovery Projects to Ensure Timely Completion of Required Documentation
  - Goal 5: Maintain Effective Coordination and Partnerships with Local, Regional, and State Agencies

The Fire Facilities and Equipment Master Plan is part of the MVFD Strategic Plan. The MVFD participates in the City's Capital Improvement Project (CIP) budget each fiscal year. This budget identifies the fire facilities that are to be constructed in the next five fiscal years as well as future fire station locations and CIP needs. The Strategic Plan anticipates the need for twelve or thirteen fire stations, with a possible fourteenth fire station as an in-fill fire station to service projected population through 2022. In addition to building new facilities, the MVFD will need personnel and fire apparatus.

#### **d. Moreno Valley Wildfire Mitigation Plan**

Moreno Valley Utility (MVU) has prepared and continually updates a Wildfire Mitigation Plan. The primary goal for the Wildfire Mitigation Plan is to describe the city's programs and practices, and measures that effectively reduce the probability that the city's electric supply system could be the origin or contributing source for the ignition of a wildfire. MVU's entire electric supply system is located underground in conduit and vaults. Historically, undergrounded electric lines have not been associated with catastrophic wildfires. The undergrounding of electric lines serves as an effective mitigation measure to reduce the potential of power-line ignited wildfires. Based on a review of local conditions and historical fires, MVU has determined that its electrical lines and equipment do not pose a significant risk of catastrophic wildfire.

Despite this low risk, MVU takes appropriate actions to help its region prevent and respond to the increasing risk of devastating wildfires. In its role as a public agency, MVU closely coordinates with other local safety and emergency officials to help protect against fires and respond to emergencies. In its role as a utility, MVU follows all applicable design, construction, operation, and maintenance requirements that reduce safety risks associated with its system.

### **e. City of Moreno Valley Municipal Code**

Title 3 of the City of Moreno Valley Municipal Code (Municipal Code) contain an assortment of fees and taxes collected by the City. Chapters 3.38 and 3.42 establish residential and commercial/industrial development impact fees, respectively. Specifically, Section 3.38.060 requires the payment of impact fees for residential development projects and Section 3.42.060 requires the payment of impact fees for commercial and industrial projects for the purpose of acquiring, designing, constructing, improving, providing and maintaining, to the extent permitted by law, fire services facilities provided for in the City's General Plan and its adopted CIP.

Title 8 of the Municipal Code contains a number of regulations that address fire protection. Chapter 8.36 California Fire Code codifies the City's adoption of the California Fire Code. Municipal Code Section 8.36.050 addresses requirements for Wildland-Urban Interface Areas in the Planning Area and refers to the mapping of VHFHSZs in addition to providing fuel modification requirements for new construction. Specifically, any new buildings in areas containing combustible vegetation are required to prepare preliminary fuel modification plans concurrent with the submittal for approval of any tentative map.

### **4.18.3 Methodologies for Determining Impacts**

The potential for significant impacts associated with the proposed GPU has been determined based upon review of existing secondary source information and data relative to wildfires available for the Planning Area.

### **4.18.4 Basis for Determining Significance**

Thresholds used to evaluate impacts associated with wildfire are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines (California Code of Regulations Sections 15000-15387), Appendix G. Impacts related to wildfire could be significant if implementation of the project is located in or near state responsibility areas or lands classified as VHFHSZs, and if the project would:

- 1) Substantially impair an adopted emergency response plan or emergency evacuation plan;
- 2) 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;
- 3) 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; or

- 4) 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.

## 4.18.5 Impact Analysis

### 4.18.5.1 Topic 1: Emergency Response Plans

*Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The City adopted its LHMP on October 4, 2011 (revised 2017). The LHMP contains a map of emergency evacuation routes in the community that includes I-215, SR-60 and major roadways through the city. The evaluation network consists of 129 miles of roadway designated as potential evacuation routes in the event of disaster, including 34 bridges and 127 water crossings.

An analysis of development patterns and roadway connectivity indicates that some residential areas in the northern and southeastern portions of the city have constrained emergency access. These include developments in Sunnymead Ranch, Moreno Valley Ranch, and Hidden Springs. These are typically locations where residential development pre-dates incorporation into the City, and where homes are constructed on cul-de-sacs with a single point of connection to the municipal roadway network. Approval of new development in these areas would be conditioned on review by MVFD and the Moreno Valley Public Works Department to ensure adequate emergency access. Additionally, the 2021 GOU includes policies that provide for use of the City's early warning notification system to proactively alert residents of areas with constrained access in the event of a disaster requiring emergency evacuation.

Evacuation times could be improved with the implementation of technological and design strategies. For example, where appropriate, the use of painted medians instead of raised medians on roadways in areas of highest risk would effectively allow for reversible lanes that create additional outbound capacity. Application of this strategy would approximately double evacuation capacity in the northwestern portion of the city. Further, remote control of signal timing from the City's Traffic Management Center (TMC) allows for real-time modifications to signal timing that can speed evacuation in the event of emergency. Approximately half of the traffic signals in the City are currently connected to the TMC, and the 2021 GPU provides for the implementation of this technology in vulnerable areas as a priority going forward. The 2021 GPU also includes policies that provide for exploration of additional actions to facilitate emergency evacuation, including the study of improved roadway connections, including Morton Road/Gernert Road in unincorporated Riverside County to the west of Moreno Valley.

Future development would be designed, constructed, and maintained in accordance with applicable standards associated with the LHMP, including vehicular access to ensure that adequate emergency access and evacuation would be maintained. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate

measures to facilitate the passage of persons and vehicles through/around any required road closures. Moreover, future development would be required to adhere to the following goals, policies, and actions included in the 2021 GPU Safety Element.

### ***Goal***

S-1: Protect life and property from natural and human made hazards.

### ***Policies***

- S.1-12 Work to prevent wildland fire and to protect lives, property, and watersheds from fire dangers.
- S.1-13 Jointly with state, county, local and other agencies, inform property owners of wildfire risks and measures to reduce those risks.
- S.1-14 Require new development in very high FHSZs to prepare a Fire Protection Plan that minimizes risks by:
- Assessing site-specific characteristics such as topography, slope, vegetation type, wind patterns etc.;
  - Siting and designing development to avoid hazardous locations (e.g., through fire breaks) to the extent feasible;
  - Incorporating fuel modification and brush clearance techniques in accordance with applicable fire safety requirements and carried out in a manner which reduces impacts to environmentally sensitive habitat to the maximum feasible extent;
  - Using fire-safe building materials and design features to ensure the minimum amount of required fuel modification;
  - Using fire-retardant, native plant species in landscaping; and
  - Complying with established standards and specifications for fuel modification, access, and water facilities.
- S.1-15 Avoid, where feasible, locating new development in areas subject to high wildfire risk. If avoidance is not feasible, condition such new development on implementation of measures to reduce risks associated with that development.
- S.1-16 Require that all new development located in a Very High Fire Hazard Severity Zone (VHFHSZ) or a State Responsibility Area (SRA) is served by adequate infrastructure, including safe access for emergency response vehicles, visible street signs, and water supplies for fire suppression.

- S.1-17 Require new development in VHFHSZs to enter into a long-term maintenance agreement for vegetation management in defensible space, fuel breaks, and roadside fuel reduction.
- S.1-18 Continue to require proactive weed abatement, brush thinning and removal services on new and existing development in High and Very High Fire Hazard Severity Areas in order to curb potential fire hazards.
- S.1-19 Cooperate with the Riverside County Fire Department and CAL FIRE to ensure that all portions of the Planning Area are served and accessible within an effective response time and to address regional wildfire threats.
- S.1-20 Work with responsible agencies and nongovernmental organizations to plan for post-fire recovery in a manner that reduces further losses or damages from future fires.

### **Actions**

- S.1-G Maintain and make publicly available an up-to-date map of high and very high fire hazard areas, consistent with CAL FIRE designations.
- S.1-H Consider developing alternative fire protection standards suitable for Rural Residential areas not exposed to high wildland fire hazards.
- S.1-I Disseminate information on fire weather watches and fire risks via the City's website and encourage all Moreno Valley residents to engage in risk reduction and fire preparedness activities.

Additionally, the 2021 Transportation Element identifies roadway improvements that would increase traffic capacity, and thereby ensure that the roadway network would be capable of accommodating traffic flows during emergency response and emergency evacuation. Therefore, adherence to applicable LHMP standards and 2021 GPU Safety Element policies, as well as increased traffic capacity in the proposed roadway network, would ensure that the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

### **4.18.5.2 Topic 2: Wildfire**

*Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

As shown in figures 4.18-1 and 4.18-2, the proposed Concept Areas have largely avoided areas identified as having High, Very High, or Extreme CAL FIRE threat designations. The proposed land use changes located near these CAL FIRE threat designations are limited to the Residential Density Change Concept Area located immediately east of Moreno Beach

Drive designated with a Very High CALFIRE Fire Hazard Severity Zone (FHSV) (see Figure 4.18-1) and designated as a mix of Extreme, Very High, and High CAL FIRE Fire Threat Areas (see Figure 4.18-2) Additionally, the Residential Density Change Concept Area north of SR-60 is located adjacent to an area designated with a Very High CAL FIRE FHSV, and the Highway Office/Commercial Concept Area is located adjacent to an area designated with a Moderate CAL FIRE FHSV (see Figure 4.18-1). Furthermore, future development and redevelopment outside of the proposed Concept Areas consistent with the existing 2006 General Plan land use designations may also be located within, or adjacent to land identified as having High, Very High, or Extreme CAL FIRE threat designations. For instance, areas along the entire northern perimeter of the Planning Area and areas adjacent to the Bernasconi Hills in the southeastern part of the city are designated VHFHSZs, as are areas along the eastern perimeter of the Planning Area. There is existing low density single-family residential development in and adjacent to these VHFHSZs, notably in the vicinity of Petit Hill north of Ironwood and south of Iris and John F. Kennedy, where residential neighborhoods abut the Bernasconi Hills.

Prolonged droughts coupled with high winds and dry vegetation create the highest fire risk in these areas, particularly in autumn and winter, when the Santa Ana winds typically blow and wildfire risk increases significantly. In addition to the direct physical threat to life and property, smoke released during an event can have a detrimental effect on air quality and lead to health risks from smoke inhalation. To address this risk, the City cooperates with CAL FIRE and the Riverside County Fire Department through cooperative fire protection agreements. Portions of the planning area within the SOI are designated State Responsibility Areas (SRA), where the State of California is financially responsible for the prevention and suppression of wildfires, while the Moreno Valley Fire Department has primary responsibility for Local Responsibility Areas (LRA) within the City limit. While the majority of the city is flat, there are some areas that have slopes. These include the Residential Density Change Concept Area located immediately east of Moreno Beach Drive, and areas in the northern and southern portion of the Planning Area. Areas with slopes correspond with the areas identified as having greater landslide risk presented on Figure 4.7-3 in Section 4.7. These areas largely correspond with areas identified as having High, Very High, or Extreme CAL FIRE threat designations presented in Figures 4.18-1 and 4.18-2, and would be subject to elevated risk associated with the spread of wildfire. However, future development would be required to comply with fuel modification regulations including the submittal of plans to MVFD.

Wildland urban interface areas exist on the north, east, and south edges of the planning area, including Box Springs Mountain and San Timoteo Canyon to the north, the “Badlands” to the east, and Lake Perris State Park to the south. Portions of these areas within the City limit are partially developed with low density single-family housing, while portions in the SOI are largely undeveloped. Within the City limit, large tracts of land in wildland urban interface areas are designated Parks/Open Space on the 2021 GPU proposed land use map, which would not permit residential development, and existing development is limited to low density single-family homes. Undeveloped lands in wildland urban interface areas within the City limit are designated Hillside Residential or Rural Residential, which permit only very low density residential development. The City has adopted specific requirements for



development in these areas. All new construction in these areas is required to prepare a fuel modification plan before approval of tentative maps and grading permits. The City has also established a weed hazard abatement program, which is overseen by MVFD. This program is designed to create defensible space, or a buffer between a building and the flammable vegetation that surrounds it, in order to stop or slow the spread of wildfire and protect property.

The 2021 GPU would also require preparation of a fire protection plan (FPP) approved by the fire code official prior to approving new development in VHFHSZs. FPPs must include mitigation measures designed to address the unique problems resulting from the location, topography, geology, flammable vegetation, and climate of the proposed site. They must also consider water supply, access, building ignition and fire resistance, fire protection systems and equipment, defensible space, and vegetation management, and must be consistent with the requirements of California Building Code Chapter 7A, the International Wildland-Urban Interface Code, and the Moreno Valley Municipal Code. Additionally, the 2021 GPU includes policies to provide fire prevention and emergency response services that minimize fire risks and protect life and property, and monitor the pace and location of development within the Planning Area and coordinate the timing of fire station construction or expansion to the rise of service demand in surrounding areas to ensure fire safety. Therefore, compliance with MVFD regulations and 2021 GPU policies would ensure that the project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and impacts would be less than significant.

### **4.18.5.3 Topic 3: Infrastructure**

*Would the project 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?*

The project would require introduction of future infrastructure to support increased population and job growth anticipated in the Planning Area. The majority of future infrastructure development would be concentrated in the Concept Areas Future development and redevelopment outside of the proposed Concept Areas consistent with the existing 2006 General Plan land use designations would require some infrastructure development as well. However, future development and corresponding infrastructure development would be subject to the MVFD regulations and 2021 GPU policies described in Section 4.18.5.2 above. Therefore, compliance with MVFD regulations and 2021 GPU policies would ensure that installation or maintenance of associated infrastructure would not exacerbate fire risk, and impacts would be less than significant.

#### 4.18.5.4 Topic 4: Flooding or Landslide

*Would the project 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?*

Wildfire can alter the hydrologic response of a watershed to the extent that even modest rainstorms can produce dangerous flash floods and debris flows. A number of factors affect the likelihood of downstream flooding or landslide after a fire including basin morphometry, burn severity, soil properties, and rainfall characteristics (U.S. Geological Survey 2021). As the project focuses development within the existing developed areas of the city, the potential exposure of people or structures to flooding or landslides from post-fire slope instability would not increase due to project implementation.

As detailed throughout Section 4.10.5 of this EIR, potential flooding could occur in a number of ways: new development and redevelopment under the project could increase storm water velocity leading to off-site flooding (Section 4.10.5.3(b)); new development and redevelopment under the project could impede or redirect flood flows (Section 4.10.5.3(d)); and the placement of new or redevelopment projects within Federal Emergency Management Agency (FEMA) floodplains (Section 4.10.5.4). However, as discussed therein, all future development and redevelopment would comply with applicable federal, state, regional and local plans, policies, and regulations. Future site-specific projects would be required to include project-specific flood control measures, production of storm water plans and use of best management practices, as well as FEMA processing, among other planning tools (see Section 4.10.5 for additional details). Through compliance measures, impacts related to flooding was found to be less than significant.

Potential impacts associated with landslides are discussed in Section 4.7.5.1.c of this EIR. Potential landslides could occur because the Planning Area is located within seismically active southern California region, and is located in close proximity to the San Jacinto Fault (see Section 4.7.5.1(a)). Additionally, due to the underlying geology of the Planning Area, there are a number of landslide susceptible areas within the Planning Area (see Section 4.5.5.1(c)). However, implementation of site-specific recommendations provided within a required geotechnical investigation would reduce impacts associated with landslides, slope instability, and mudflows to less than significant.

While the Planning Area could be subject to risks associated with downstream flooding or landslides due to post-fire instability, future site-specific projects would be required to adhere to all applicable regulations focused on both flooding and fire safety. Additionally, the project would not expand potential development areas that would substantially increase risk of post-fire landslide or flooding. Therefore, the project would not increase risk associated with post-fire flooding or landslides, and impacts would be less than significant.

### **4.18.6 Cumulative Analysis**

MVFD and the 2021 GPU have numerous policies that would prevent wildfires. Large tracts of land in wildland urban interface areas are designated Parks/Open Space on the 2021 GPU proposed land use map, which would not permit residential development, and existing development is limited to low density single-family homes. Undeveloped lands in wildland urban interface areas within the city limit are designated Hillside Residential or Rural Residential, which permit only very low density residential development. The City has adopted specific requirements for development in these areas. All new construction in these areas is required to prepare a fuel modification plan before approval of tentative maps and grading permits. The City has also established a weed hazard abatement program, which is overseen by MVFD. This program is designed to create defensible space, or a buffer between a building and the flammable vegetation that surrounds it, in order to stop or slow the spread of wildfire and protect property.

The 2021 GPU would also require preparation of a fire protection plan (FPP) approved by the fire code official prior to approving new development in VHFHSZs. FPPs must include mitigation measures designed to address the unique problems resulting from the location, topography, geology, flammable vegetation, and climate of the proposed site. Additionally, the 2021 GPU includes policies to provide fire prevention and emergency response services that minimize fire risks and protect life and property, and monitor the pace and location of development within the Planning Area and coordinate the timing of fire station construction or expansion to the rise of service demand in surrounding areas to ensure fire safety. Therefore, compliance with MVFD regulations and 2021 GPU policies would ensure that the project would not contribute to a cumulative impact related to wildfire.

### **4.18.7 Significance of Impacts before Mitigation**

Impacts would be less than significant. No mitigation is required.

### **4.18.8 Mitigation**

Impacts would be less than significant. No mitigation would be required

### **4.18.9 Significance of Impacts after Mitigation**

Impacts would be less than significant. No mitigation is required.



## **Chapter 5**

# **CEQA Mandated Analysis**

California Environmental Quality Act (CEQA) Guidelines Section 15126.2(b) and (c) require that the significant unavoidable impacts of the project, as well as any significant irreversible environmental changes that would result from project implementation, be addressed in the Environmental Impact Report (EIR). Additionally, CEQA Guidelines Section 15126.2(e) requires that an EIR evaluate the “growth-inducing” effects of a project. The following paragraphs discuss these mandated topics associated with implementation of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan, herein after referred to as the project. The analysis area covers the entire city of Moreno Valley (City) and sphere of influence, which are collectively referred to as the Planning Area. Within the analysis, Concept Areas refers to those areas where the GPU proposes land use changes as shown on Figure 3-1.

### **5.1 Significant Environmental Effects Which Cannot Be Avoided if the Project is Implemented**

In accordance with CEQA Guidelines Section 15126.2 (b) any significant unavoidable impacts of a project, including those impacts that can be mitigated but not reduced to below a level of significance despite the applicant’s willingness to implement all feasible mitigation measures, must be identified in the EIR. Implementation of the project would result in significant, unavoidable impacts associated with the following issues: agriculture and forestry resources (important farmland and indirect conversion), air quality (construction emissions of criteria pollutants), biological resources (sensitive species, sensitive riparian habitats, and jurisdictional wetlands and waters), cultural and tribal cultural resources (historic resources, archaeological resources, human remains, and tribal cultural resources), noise (increases in ambient noise associated with traffic and construction), and

transportation (vehicle miles traveled). Chapter 4.0 of this EIR provides more detail about the nature and extent of these impacts related to implementation of the project.

These impacts would remain significant and unavoidable as a result of the project. A Statement of Overriding Considerations, consistent with CEQA Guidelines Section 15093, will be prepared, for certification with the Final EIR, identifying specific economic, legal, social, technological, or other benefits of the project which allow approval of the project to outweigh the unavoidable impacts.

## **5.2 Significant Irreversible Environmental Changes Which Would Result if the Project is Implemented**

In accordance with CEQA Guidelines Section 15126.2(c):

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvements which provide access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.

Non-renewable resources generally include agricultural land; biological, archaeological, and paleontological resources; mineral deposits; water bodies; and some energy sources. The project has been designed to minimize impacts to sensitive biological resources by primarily focusing future development and redevelopment within the proposed Concept Areas. These areas consist of clusters of vacant and underutilized land within the city limit that would avoid the majority of sensitive habitat that is located within the eastern and southeastern portion of the Planning Area. Focusing development and redevelopment within these areas that consist primarily of developed and/or disturbed land would minimize adverse impacts to sensitive species. Similarly, the Concept Areas avoid the majority of the identified historic and potentially eligible historic resources, as well as the majority of the archaeological sensitive complexes. Nonetheless, impacts to biological and cultural resources were found to remain significant and unavoidable, because it cannot be known at the program level of analysis with certainty that impacts to sensitive species could be fully avoided or be fully mitigated. (see Sections 4.4 and 4.5 of this EIR). Additionally, implementation of the project would result in the permanent loss of 15 acres of land designated Prime Farmland, as well as the additional loss of farmland due to indirect conversion of agricultural land through urbanization (see Section 4.2). Therefore, future development consistent with the project could result in the permanent loss of biological, cultural, and agricultural resources.

There exists some potential for paleontological resources to be present within the Planning Area, primarily within portions of the sphere of influence that have been identified as having

a high potential for paleontological resources. However, implementation of mitigation measure PAL-1 would reduce impacts associated with future grading and development to a level less than significant (see Section 4.7). As described in Section 4.10, implementation of the project would result in less than significant impacts to water bodies (drainage and water quality). The Planning Area does not support any mineral extraction activities, and the small amount of land designated as MRZ-2 in the southeastern portion of the sphere of influence is not located within any of the proposed Concept Areas. Therefore, impacts related to mineral resources would be less than significant.

With regard to energy resources, actions related to future development would result in an irretrievable commitment of nonrenewable resources, including as energy supplies and construction materials, such as lumber, steel, and aggregate. Non-renewable energy resources (coal, natural gas, oil) would be used in construction, heating, and refrigeration of food and water, transportation, lighting, and other associated energy needs. (Energy impacts are further discussed in Section 4.6 of this EIR).

In summary, implementation of the project would result in an increase in residential, business park, industrial, office, commercial, and civic and institutional uses throughout the Planning Area, particularly within the Concept Areas (see Figure 3-1). Construction and operation associated with implementation of future projects would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses. However, the use of such resources would be consistent with local and regional growth forecasts for the area (see Section 4.14). Therefore, although irreversible environmental changes would result from future development, such changes would not be considered significant.

### **5.3 Growth Inducement**

CEQA Guidelines Section 15126.2(d) requires that an EIR:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (for example, a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population might tax existing community services facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can directly or indirectly induce growth. Construction of new housing would directly induce population growth. However, if a project creates substantial new permanent

employment opportunities, it could indirectly induce growth by stimulating the need for additional housing and services to support the new employment demand. It could also indirectly induce growth by removing infrastructure limitations or regulatory constraints on a required public service, such as roads or water service.

### **5.3.1 Population and Housing Growth**

The project does not propose the construction of new housing or other development; rather it provides capacity for future development consistent with state Housing Element Law and regional plans including the Southern California Association of Governments (SCAG) 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The California Department of Finance is responsible for developing the total statewide housing demand projection. With the state Department of Housing and Community Development, this demand is apportioned to each of the state's regions. SCAG is responsible for allocating the region's projected new housing demand in each of its member jurisdictions through the Regional Housing Needs Assessment (RHNA) process (see Chapter 3.0, Project Description). The allocation takes into account factors such as market demand for housing, employment opportunities, the availability of suitable sites and public facilities, commuting patterns, type and tenure of housing need, and others. Therefore, the 2021 GPU portion of the project contains policies and implementation programs that would provide for housing development consistent with the City's share of the regional housing need as identified in the RHNA.

As described in Section 4.14, buildout of the project would result in development of approximately 22,052 new homes, which is greater than the RHNA allocation assigned to the city of 13,627 new homes. This exceedance of the RHNA allocation would provide a buffer in all income categories to ensure the city can navigate the no net loss provisions of the state Housing Element law and have continued ability to meet the RHNA by income group throughout the planning period.

Section 4.14 also documented that buildout of the project would result in approximately 72,737 households in 2040, which would be fewer than the 2040 SCAG household projection of 73,000. Similarly, the project's projected population size of 252,179 would be less than the 2040 SCAG projection of 256,600. This difference in population is due to the greater share of multi-family units that would likely result under buildout of the project compared to buildout of the existing 2006 General Plan, as multi-family units typically have a lower household population. Therefore, the project would accommodate projected future housing needs in the Planning Area and would not induce population growth.

Furthermore, the project has been designed to primarily focus future development and redevelopment within Concept Areas that consist of vacant or underutilized land along major transit corridors.

### **5.3.2 Removal of an Impediment to Growth**

The project does not propose the construction or expansion of new housing, services, or other infrastructure development; rather it provides for future development consistent with state

Housing Element Law. The project has been designed to primarily focus future development and redevelopment within Concept Areas that consist of vacant or underutilized land along major transit corridors. ~~Future development outside of the Concept Areas would occur in areas that are already served by infrastructure, including the Downtown Center, Moreno Valley Mall area, and the Alessandro, Perris, and Sunnymead corridors. To accommodate this new growth pattern, it is anticipated that sewer line improvements will be required in these areas, including a new sewer line to collect wastewater and a new trunk sewer to convey the flows to the wastewater treatment plant. Other wastewater collection system improvements needed to support planned business and industrial development in the eastern part of the city have been defined and planned for as part of a separate Specific Plan process. Certain areas in the northeast portion of the city planned for highway commercial/office will require sewer extensions to accommodate development, although all areas planned for development are within the existing Eastern Municipal Water District (EMWD) boundaries where service is available. The cost of the new sewer collection and conveyance system improvements will be paid by development as projects are proposed. -Implementation of the land use plan would not require major expansions of infrastructure that would induce unplanned growth. and would not require extensions into unserved portions of the Planning Area. Therefore, f~~Future infrastructure development would occur within the existing facility service areas within areas that are already served by essential roads, utilities, and public services, and the project would not remove an impediment to growth.

### 5.3.3 Foster Economic or Employment Growth

The project does not propose or provide direct development rights to new major retail, commercial or employment centers that would encourage substantial economic or employment growth. Rather, it provides capacity for future development consistent with regional plans including SCAG 2016 RTP/SCS. The project would slightly increase the number of jobs to 83,246 compared to the SCAG 2040 growth projection of 83,200. However, this slight increase in approximately 46 jobs would have a negligible effect on future growth that would be offset by the decrease in population and households compared to SCAG 2040 growth projections described in Section 5.3.1 above. Therefore, future economic and employment growth associated with the project would not induce growth.

## 5.4 Conclusion

Overall, the project would not be growth inducing as it would serve to accommodate projected growth as required by state law. The project would not remove an impediment to growth, nor does it propose to develop, or permit the encroachment into an isolated area adjacent to open space, or foster economic and employment expansion. As discussed above, the project would accommodate projected population growth and would not be considered growth inducing because it would provide housing capacity for projected population growth. The opportunities to provide housing would be consistent with the city's need to establish a resilient housing base for the community and comply with state law.





## Chapter 6

# Project Alternatives

The California Environmental Quality Act (CEQA) Guidelines Section 15126.6 requires that an Environmental Impact Report (EIR) compare the effects of a “reasonable range of alternatives” to the effects of a project. The CEQA Guidelines further specify that the alternatives selected should attain most of the basic project objectives and avoid or substantially lessen one or more significant effects of the project. The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency, and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines “feasible” to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

### 6.1 Selection of Alternatives

Chapter 4.0 of this PEIR provided a detailed analysis of 20 environmental issue areas for which the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP), could have a significant effect on the environment. The project would result in significant and/or cumulative environmental impacts related to air quality, agricultural resources, biological resources, cultural and tribal cultural resources, noise, and transportation. In developing the alternatives to be addressed in this chapter, consideration was given regarding their ability to meet the basic objectives of the project and their potential to eliminate or substantially reduce those significant environmental impacts.

The following specific objectives support the underlying purpose of the project, assist the City as Lead Agency in developing a reasonable range of alternatives to evaluate in this EIR (EIR),

and will ultimately aid the Lead Agency in preparing findings and overriding considerations. The following specific objectives have been established for the project:

- Provide a flexible land use framework that can accommodate job growth in a variety of industries over time while enhancing quality of life in the community;
- Build a strong, diverse economy with well-paying jobs in the city for local residents, reducing the need for long commutes and achieving a better balance of jobs-to-housing;
- Ensure a sustainable, measured rate of growth and efficient delivery of public services;
- Create a destination Downtown Center that makes Moreno Valley a destination city with a modern, innovative brand and that will help establish Moreno Valley as a model community where people choose to live, work, and play;
- Focus new residential and commercial development in corridors to support more frequent and reliable transit service; promote walking and biking; and reduce vehicle miles travelled;
- Foster development of gateways at key entry points into the community that announce arrival with attractive architecture and inviting uses to build Moreno Valley's sense of place;
- Facilitate development of a range of housing options that provides for the needs of current and future residents, including people of all ages, abilities, and incomes levels;
- Accommodate the City's 2021-2029 Regional Housing Needs Allocation (RHNA) allocation;
- Reduce community-wide greenhouse gas emissions consistent with statewide targets;
- Foster vibrant gathering places for locals and visitors to shop, dine, do business, and have fun, providing a range of social interaction opportunities for youth, families, and seniors;
- Enhance neighborhood livability through promoting active lifestyles with indoor and outdoor recreational amenities and prioritizing clean air, water, fresh food, and community health; and
- Encourage mindful stewardship of water, energy, and other environmental resources, and explore technological advancements as a way to enhance current/future needs and lifestyles.

The alternatives addressed in this PEIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would feasibly accomplish most or all of the basic objectives of the project;
- The extent to which the alternative would avoid or substantially lessen any of the identified significant environmental effects of the project.

- The appropriateness of the alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice; and
- The requirement of the CEQA Guidelines to consider a “no project” alternative; and to identify an “environmentally superior” alternative in addition to the no project alternative (Section 15126.6[e]).

Based on the criteria described above, this PEIR considers the following project alternatives:

- No Project Alternative;
- Reduced Growth Alternative; and
- Redistributed Growth Alternative.

## 6.2 Comparison of Impacts

General descriptions of the characteristics of each alternative, along with a discussion of their ability to reduce significant environmental impacts associated with the project, are provided in the following subsections. Table 6-1 provides a side-by-side comparison of the potential impacts of the alternatives to the impacts of the project.

Environmental Issue Area	Project	No Project Alternative	Reduced Growth Alternative	Redistributed Growth Alternative
Aesthetics	LTS	Greater/LTS	Similar/LTS	Similar/LTS
Agriculture and Forestry Resources	SU	<u>LTSLess/SU</u>	<u>LTSLess/SU</u>	<u>LTSLess/SU</u>
Air Quality	SU	Greater/SU	<u>LTSLess/SU</u>	<u>LTSLess/SU</u>
Biological Resources	SU	<u>LTSLess/SU</u>	<u>LTSLess/SU</u>	<u>LTSLess/SU</u>
Cultural and Tribal Cultural Resources	SU	<u>LTSLess/SU</u>	<u>LTSLess/SU</u>	Similar/SU
Greenhouse Gas Emissions	LTS	Greater/SU	<u>LTSLess/SU</u> <u>LTS</u>	<u>LTSLess/SU</u> <u>LTS</u>
Land Use/Planning	LTS	Greater/SU	Similar/LTS	Similar/LTS
Noise	SU	Greater/SU	<u>LTSLess/SU</u>	<u>LTSLess/SU</u>
Transportation	SU	Greater/SU	<u>LTSLess/SU</u>	<u>LTSLess/SU</u>
LTS = less than significant; SU = significant and unavoidable				

The following issue areas were found to result in less than significant impacts in this EIR and the impact of each of the alternatives would not be significantly different; thus, they are not discussed in further detail:

- Energy
- Geology/Soils
- Hazards & Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Population/Housing
- Public Services and Recreation
- Utilities/Service Systems
- Wildfire

## **6.3 No Project Alternative**

### **6.3.1 Description**

Under the No Project Alternative, the proposed amendments to the adopted General Plan, Housing Element Update, and adoption of the CAP would not occur. Growth in the city would continue to be guided by the existing land use plans and programs. Specifically, a summary of existing land uses is provided in Table 4.11-1, with existing land uses shown on Figure 4.11-1. Under the No Project Alternative, development would continue to occur through site-specific rezoning and General Plan amendment actions, rather than through a comprehensively planned approach. The planned densities needed to accommodate the region's housing and provide the required levels of affordability would not occur. Planning for mobility infrastructure would continue as it currently exists, without a comprehensive strategy intended to reduce reliance on vehicular travel and promote other forms of mobility.

### **6.3.2 Analysis**

#### **6.3.2.1 Agricultural Resources**

The project would result in the conversion of agricultural uses within the Concept Areas (those areas where the GPU proposes land use changes as shown on Figure 3-1) to urban uses. Maximum impacts to mapped farmland with the Concept Areas is shown in Table 4.2-2. The loss of designated farmland, both directly and indirectly within the Concept Areas and throughout the Planning Area, would be considered a significant impact. Feasible mitigation that would meet the objectives of the project does not exist to mitigate direct and cumulative impacts to important farmland to a level less than significant, because the conservation of farmland would be inconsistent with the proposed 2021 GPU goals and updated land use map. Therefore, impacts to agricultural resources would be significant and unavoidable.

The No Project Alternative would maintain the existing General Plan policies and land use map. The existing agricultural policies are focused on retention of agricultural open space for economically viable agricultural options. However, agricultural operations have continued to be disincentivized and no longer reflect economic opportunities for the City since adoption of the existing 2006 General Plan. Farming uses in the Planning Area are limited to intermittent farming activities north of State Route 60 (SR-60) in the northeast portion of the City. Under the No Project Alternative, development would continue consistent with the existing 2006 General Plan land use plan and policies. The existing 2006 General Plan foresaw that agricultural operations may become less important to the City's economic success, and while swaths of Prime Farmland are mapped within the Planning Area, there is no agricultural land use designation on the existing 2006 General Plan land use map. It is conceivable that as land develops under the existing 2006 General Plan, more urban uses would replace agricultural operations. Like the project, no feasible mitigation would exist to reduce these impacts. Therefore, impacts related to agricultural resources would remain significant and unavoidable, and would be less than the project.

### 6.3.2.2 Air Quality

The project would not exceed the assumptions used to develop the Air Quality Management Plan (AQMP) and the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. The scale and extent of construction activities associated with buildout of the Planning Area could exceed the relevant South Coast Air Quality Management District (SCAQMD) thresholds for some projects, and impacts associated with criteria pollutants during construction were determined to be significant and unavoidable. The project would not expose sensitive receptors to substantial pollutant concentrations, and would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people.

The No Project Alternative would constitute buildout of the existing 2006 General Plan. As described in Section 4.3 above, buildout of the existing 2006 General Plan would generate 4,566,084 VMT. In comparison, this would be greater than buildout of the project, which would generate 4,524,038 VMT. Buildout of the existing 2006 General Plan would generate greater VMT because the existing land use plan does not focus future development and redevelopment within clusters of vacant and underutilized land, as under the 2021 GPU land use plan. Therefore, buildout of the existing 2006 General Plan would generate more VMT compared to buildout of the project, which in turn would result in greater vehicle emissions. As shown in Table 4.3-4, buildout of the existing 2006 General Plan would generate greater emissions when compared to buildout of the 2021 GPU. Section 4.3 determined that the project would have significant and unavoidable impacts associated with criteria pollutants during construction. Construction activities associated with buildout of the existing 2006 General Plan could similarly generate short-term criteria pollutant emissions that would exceed the SCAQMD's significance thresholds and cumulatively contribute to the nonattainment designations of the Basin. Therefore, impacts related to air quality would remain significant and unavoidable, and would be greater than the project due to the increase amount of VMT-generated emissions.

### 6.3.2.3 Biological Resources

Undeveloped lands located throughout the Planning Area are typically comprised of disturbed lands and non-native grasses with small pockets of riparian vegetation occurring within urban canyons as shown in Figure 4.4-1. Native habitats and species are largely limited to areas around the city where lands are in proximity to surrounding conserved natural areas including the San Jacinto Wildlife Area. Known locations of sensitive plants within the city are presented in Figure 4.4-2, and summarized in Table 4.4-2. Specifically, sensitive plants within the city are limited to the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)-covered species, southern California black walnut (*Juglans californica*) in the northeastern portion of the City and smooth tarplant (*Centromadia pungens* ssp. *laevis*), within the eastern portion of the city. Locations of sensitive wildlife observations within the city are primarily located to the southeast, adjacent to the Lake Perris State Recreation Area, as well as some areas along the eastern and northern boundaries of the City. Although the project has been designed to minimize impacts

to sensitive species by primarily focusing future development and redevelopment within the Concept Areas, buildout under the project would result in potentially significant direct and indirect impacts due to habitat removal within the Concept Areas and throughout the Planning Area. Future site-specific projects would be required to adhere to applicable federal, state and local regulations that provide protections for sensitive species as part of the discretionary approval process for individual development projects. Additionally, a mitigation framework is included to be implemented with the project. However, it is not possible at the program level of analysis to ensure that every impact could be fully mitigated. Therefore, impacts to sensitive habitat and species, and impacts to riparian and jurisdictional wetlands, are determined to remain significant and unavoidable.

Under the No Project Alternative, development would continue consistent with the existing 2006 General Plan land use plan and policies. Vacant lands and those supporting sensitive habitat could be developed consistent with the City's existing land use plan. It is conceivable that as land develops under the City's existing plan, impacts to on-site habitat and species would be removed, resulting in potentially significant impacts to biological resources. At the time of the processing of future site-specific projects, site-specific general biological resource surveys would be required to identify the presence of any sensitive biological resources, including any sensitive plant or wildlife species, and further identify the need for additional protocol/focused surveys for wetlands and/or other known sensitive species. Additionally, future site-specific projects would be required to avoid breeding season construction if there is the potential to remove habitat or mature trees known to support sensitive species of birds. While implementation of such measures would generally serve to reduce impacts to less than significant levels, no site-specific projects have been identified at this time, and it is not possible to ensure that future development could fully mitigate potentially significant impacts despite the applicable regulatory framework. Therefore, impacts to biological resources would remain significant and unavoidable, and would be less than the project.

#### **6.3.2.4 Cultural and Tribal Cultural Resources**

Review of the records search from Eastern Information Center (EIC) and recent aerial photographs identified 48 historic resources that are presented in Table 4.5-1. Of the 48 historic resources that were identified within the Planning Area, eight were determined to be significant (see Section 4.5.1.4.a). Additionally, a search of the EIC identified 255 archaeological resources located throughout the Planning Area. Nine of the identified archaeological resources have been previously recommended eligible for the listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). Forty resources have been recommended not eligible for the NRHP/CRHR. Four resources have been destroyed by construction and the remaining 202 resources have not been evaluated and should be considered potentially significant.

As shown in Figure 4.5-1, the proposed Concept Areas would avoid the majority of the known historic or potentially historic resources within the Planning Area. Nevertheless, the proposed Residential Density Change Concept Area located south of Sunnymead Boulevard and east of Heacock Street would overlap with the location of one resource identified as significant, and two resources recommended eligible for the NRHP. Future development and

redevelopment outside of the proposed Concept Areas consistent with the existing 2006 General Plan land use designations would also have the potential to impact known historic or potentially historic resources, including unrecorded historical resources that have not been evaluated or may become eligible for listing in the future. Furthermore, implementation of the project would have the potential to impact significant archeological and/or Tribal cultural resources which would be considered a significant impact. A mitigation framework is included to be implemented with the project; however, it is not possible to ensure at a program level of analysis that every impact could be fully mitigated. Therefore, impacts to cultural and tribal cultural resources would remain significant and unavoidable.

Under the No Project Alternative, development would continue consistent with the existing 2006 General Plan land use designations. The development of currently vacant land, and redevelopment of projects throughout the Planning Area would have the potential to impact known historic or potentially historic resources, including those resources that have not been evaluated or may become eligible for listing in the future. Furthermore, development within vacant lands may result in indirect impacts to the visual and setting integrity to significant historic resources. Like the proposed mitigation framework, future development under the No Project Alternative would be required to implement site-specific historic structural evaluations of on-site buildings that may qualify as historic resources. Additionally, future development would be required to prepare site-specific archaeological surveys and develop project-specific measures as necessary. While implementation of such mitigation measures would generally serve to reduce impacts to less than significant levels, no site-specific projects have been identified at this time, and it is not possible to ensure that every future site-specific project could fully mitigate potentially significant impacts despite the application of mitigation measures. Therefore, impacts to cultural and Tribal cultural resources under the No Project Alternative would remain significant and unavoidable, and would be less than the project.

### **6.3.2.5 Noise**

Under the project, changes to land uses throughout the Concept Areas, coupled with buildout of the city, would result in the increase in ambient noise levels adjacent to a number of roadway segments (see Table 4.13-12) that would likely remain at levels that would expose existing noise-sensitive receptors to ambient noise levels that would be significant. Because the significant noise impacts would be to existing homes and other noise-sensitive uses in an already urbanized area, there is no feasible mitigation, and impacts would remain significant and unavoidable.

Noise/land use compatibility impacts would occur as shown in Figure 4.13-4. Specifically, significant land use compatibility impacts would result due to future vehicle traffic noise within the Downtown Center and Highway Office/Commercial Concept Areas, as well as within the areas targeted for increased residential density, including between Sunnymead Boulevard, and Cottonwood Avenue; Heacock Street, and Perris Boulevard; south of Ironwood Avenue and north of SR-60 along Moreno Beach Drive; and southwest of the intersection of Krameria Avenue and Perris Boulevard. Proposed 2021 GPU policies would be implemented to reduce significant noise impacts, including that all future development

located in areas where exterior noise levels exceed the land use compatibility standards as defined in the 2021 GPU Noise Element would require site-specific interior noise analyses demonstrating compliance with the interior noise standards of Title 24 and the proposed 2021 GPU. These requirements for site-specific noise analyses would be implemented through submission of a Title 24 Compliance Report to demonstrate interior noise levels of 45 community noise equivalent level (CNEL), ensuring that noise impacts associated with new development would be less than significant.

Construction-related noise and vibration impacts associated with any individual development under the project may occur near noise-sensitive receptors resulting in a significant impact. The project includes a mitigation framework focused on the reduction of construction and vibration-related noise impacts which would be implemented by future site-specific projects. However, while vibration related impacts would be reduced to less than significant levels, general construction noise impacts to existing homes and other noise-sensitive uses in an already urbanized area would remain significant and unavoidable.

The No Project Alternative would retain the existing 2006 General Plan, and development throughout the city would remain consistent with the existing land use map. The Planning Area is currently subject to typical urban noises such as noise generated by traffic, heavy machinery, and day-to-day outdoor activities. Existing ambient noise levels throughout the Planning Area range as high as 74.8 one-hour equivalent ( $L_{eq}$ ). As shown in Figure 4.13-2, existing noise levels at areas located closest to the roadways exceed 60 CNEL. The No Project Alternative would generate a greater amount of VMT compared to the project, which could generate greater levels of ambient noise. Future site-specific projects would be required to adhere to regulatory standards, existing 2006 General Plan policies, and mitigation requiring site-specific noise analyses. However, it is not possible to ensure that every future site-specific project could fully mitigate potentially significant impacts despite the application of mitigation measures and adherence to regulatory standards. Therefore, impacts associated with noise under the No Project Alternative would remain significant and unavoidable, and would be greater than the project.

### **6.3.2.6 Transportation**

Buildout of the existing 2006 General Plan would generate 4,566,084 VMT. In comparison, this would be greater than buildout of the project, which would generate 4,524,038 VMT. Buildout of the existing 2006 General Plan would generate greater VMT because the existing land use plan does focus future development and redevelopment within clusters of vacant and underutilized land, as under the 2021 GPU land use plan. Therefore, buildout of the existing 2006 General Plan would generate VMT compared to buildout of the project. Furthermore, buildout of the existing 2006 General Plan would not include roadway widening proposed under the project would improve traffic conditions, and therefore may result in congestion that could interfere with emergency access and response. Therefore, impacts related to transportation would remain significant and unavoidable, and would be greater than the project.



### **6.3.2.7 Issues Found Less than Significant in the EIR**

As detailed in Section 6.2 above, impacts associated with a number of environmental topics were found to be less than significant in the EIR. For most of these issues, implementation of the No Project Alternative would also result in generally the same less than significant impact, with the exception of greenhouse gas (GHG) emissions, aesthetics, and land use and planning. Implementation of the No Project Alternative would not include implementation of a CAP and, therefore, would not provide new policy to guide the City toward GHG emission reductions. Absent implementation of a CAP and the associated policy framework, it is assumed that the City would not reduce GHG emissions to the same degree as projected under the project. Therefore, impacts related to GHG emissions under the No Project Alternative would be significant and unavoidable.

Impacts related to aesthetics under the No Project Alternative are anticipated to be greater than the project in the absence of the comprehensive goals and policies that define the character and visual quality of future development in the city. However, since existing General Plan policies would remain in place, impacts are assumed to be less than significant.

Impacts related to land use and planning under the No Project Alternative are anticipated to be greater than under the project. Under the No Project Alternative, the City would not implement various City planning initiatives such as creating new vibrant town centers. Additionally, the Housing Element Update would not be implemented, which would conflict with state requirement and would not achieve housing targets. Finally, the project would not implement a new Mobility Element and CAP to ensure compliance with SB 743 and state GHG reduction targets. The project would also support growth to meet 2040 SCAG projections. Therefore, impacts related to land use and planning under the No Project Alternative would be significant and unavoidable.

### **6.3.3 Conclusions**

As shown in Table 6-1, the No Project Alternative would result in the same significant and unavoidable impacts associated with agricultural resources, air quality, biological resources, cultural and tribal cultural resources, noise, and transportation. However, due to the reduced intensity of employment opportunities and residential density that would occur under the existing 2006 General Plan, impacts related to agricultural resources, biological resources, and cultural and tribal cultural resources would be incrementally less compared to the project. Impacts related to air quality, noise, and transportation would be greater under the No Project Alternative because buildout of the existing 2006 General Plan would generate a greater amount of VMT. The No Project Alternative would also result in significant and unavoidable impacts related to GHG emissions and land use and planning that would be avoided with the project. Furthermore, the No Project Alternative would not meet any of the project objectives.

## **6.4 Reduced Growth Alternative**

### **6.4.1 Description**

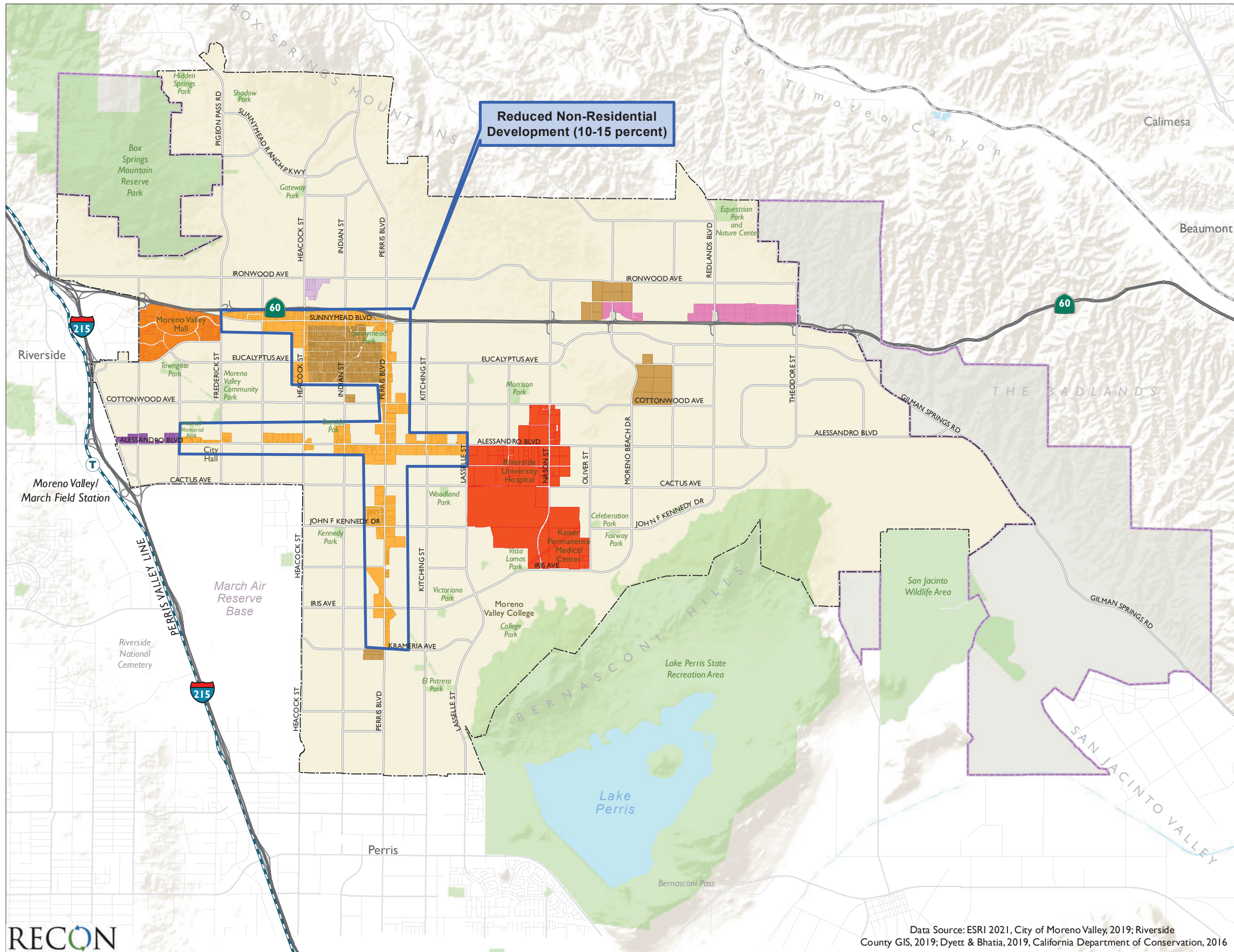
The Reduced Growth Alternative would revise the proposed land use map to reduce the amount of employment growth compared to the project (Figure 6-1). This alternative would reduce the maximum permitted floor area ratio (FAR) proposed within the Community Corridors along Sunnymead Boulevard, Alessandro Boulevard, Perris Boulevard, and Heacock Street. This would reduce the amount of non-residential development within these Community Corridors by approximately 10 to 15 percent compared to the project. This alternative would also remove the proposed Center Mixed Use within the District Specific Plan area, and reduce the footprint of the Downtown Center Concept Area by approximately 111 acres. Additionally, a portion of proposed Highway Office/Commercial Concept Area located north of SR-60 would not receive this new designation, and instead the existing office and residential land use designations from the existing 2006 General Plan would be retained.

### **6.4.2 Analysis**

#### **6.4.2.1 Agricultural Resources**

Under the project, agriculturally designated land within the Concept Areas would be converted to urban uses. These conversions would consist primarily of land designated as Farmland of Local Importance within the Downtown Center, and Highway Office/Commercial Concept Area, as well as approximately 15 acres of Prime Farmland within the Highway Office/Commercial Concept Area. The loss of Prime Farmland within the Highway Office/Commercial Concept Area, as well as indirect loss throughout the Planning Area, would be considered significant and unavoidable.

The Reduced Growth Alternative would remove a portion of the Highway Office/Commercial Concept Area that is located on soils designated as Prime Farmland. However, this area, and others that are located on soils designated as Prime Farmland, could still be developed under their current land use designations established under the existing 2006 General Plan. While development would be less intense and could result in incrementally less conversion of existing Prime Farmland, the loss of agriculturally designated lands would be considered significant. There would be no feasible mitigation that would reduce the impact to a less than significant level. Therefore, impacts to agricultural resources under the Reduced Growth Alternative would remain significant and unavoidable, and would be less than the project.



- City of Moreno Valley
- Sphere of Influence
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes

**FIGURE 6-1**  
Reduced Growth Alternative

### **6.4.2.2 Air Quality**

The project would not exceed the assumptions used to develop the AQMP, and the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. The project would not expose sensitive receptors to substantial pollutant concentrations, and would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people. The scale and extent of construction activities associated with buildout of the Planning Area could exceed the relevant SCAQMD thresholds for some projects, and impacts associated with criteria pollutants during construction were determined to be significant and unavoidable.

The Reduced Growth Alternative would reduce the amount of non-residential development within the proposed Community Corridors by approximately 10 to 15 percent compared to the project, and some portions of the Downtown Center and Highway Office/Commercial Concept Areas would retain their current land use designations. This would result in a reduction of development and VMT that would further ensure that this alternative would not exceed the assumptions used to develop the AQMP, and would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. Similarly, the reduction in development would reduce emissions even further than the project, and thereby further avoid exposure of sensitive receptors to substantial pollutant concentrations, and further avoid potential impacts associated with odors. However, the scale and extent of construction activities associated with buildout under this alternative could exceed the relevant SCAQMD thresholds for some projects, and impacts associated with criteria pollutants during construction. Therefore, impacts related to air quality under the Reduced Growth Alternative would remain significant and unavoidable, and would be less than the project.

### **6.4.2.3 Biological Resources**

As shown in Figure 4.4-6, sensitive vegetation communities located within the Concept Areas include primarily grassland and coastal Sage Scrub, as well as a small area mapped as “water.” Additionally, riparian scrub is identified just outside the Downtown Center Concept Area. Development under the project would result in a loss of these habitats. While a mitigation framework is proposed, it is not possible to ensure that every impact could be fully mitigated at a program level of analysis. Therefore, the loss of sensitive habitat, both directly and indirectly, within the Concept Areas and throughout the Planning Area, would be considered significant and unavoidable.

The Reduced Growth Alternative would reduce the footprints of the Downtown Center and Highway Office/Commercial Concept Areas that has the potential to support sensitive species. However, these areas could still be developed under their current land use designations established under the existing 2006 General Plan. While development would be less intense and could result in an incrementally reduced impact to biological resources, impacts to sensitive species would be considered significant. Like the project, without specific development plans, there is no certainty that the implementation of mitigation measures

would reduce the impact to a level less than significant. Therefore, impacts to biological resources under the Reduced Growth Alternative would remain significant and unavoidable, and would be less than the project.

#### **6.4.2.4 Cultural and Tribal Cultural Resources**

Figure 4.5-1 presents the locations of known historic resources within the Planning Area, while Figure 4.5-2 presents the locations of archeologically sensitive areas. As previously stated, the significance levels of much of the identified archaeological resources located throughout the Planning Area have not been evaluated and should be considered potentially significant. Development under the project could result in a loss of known and currently unknown archeological and Tribal cultural resources. While a mitigation framework is proposed, at a program level of analysis it is not possible to ensure that every impact could be fully mitigated. Therefore, the potential loss of cultural and tribal cultural resources, both directly and indirectly, within the Concept Areas and throughout the Planning Area, would be considered significant and unavoidable.

The changes to the land use plan associated with the Reduced Growth Alternative would not avoid any overlap with known historic resources, and would slightly reduce the overlap of the Downtown Center with the Moreno Hills Complex archeologically sensitive area. Additionally, development within the reduced Concept Areas and other areas subject to current land use designations established under the existing 2006 General Plan would have the potential to impact unknown historical archaeological, and tribal cultural resources, which would be considered a significant impact. Like the project, without specific development plans, there is no certainty that the implementation of mitigation measures would reduce the impact to a level less than significant. Therefore, impacts to cultural and tribal cultural resources under the Reduced Growth Alternative would remain significant and unavoidable, and would be less than the project.

#### **6.4.2.5 Noise**

Under the project, the addition of proposed land use changes within the Concept Areas and residential density changes throughout the Planning Area would result in significant noise impacts due to increased ambient noise levels, noise/land use compatibility, and construction/vibration noise. While future development would be required to adhere to proposed 2021 GPU policies and implement mitigation measures, ambient noise and construction-related noise impacts would remain significant and unavoidable.

The Reduced Growth Alternative would reduce employment development opportunities within the Downtown Center, Corridor Mixed Use and Highway Office/Commercial Concept Areas, which currently experience noise levels greater than 65 CNEL. The portions of the Downtown Center and Highway Office/Commercial that would not receive the new designation could still be developed under their current land use designations established under the existing 2006 General Plan, and the Community Corridors would be developed with slightly less density. Construction related noise impacts under this alternative would be similar compared to the project. Additionally, new residential uses could result in noise/land use compatibility impacts similar to the project. However, the reduced growth

under this alternative would result in a reduction of VMT compared to the project. Therefore, impacts related to noise under the Reduced Growth Alternative would be significant and unavoidable, and would be less compared to the project.

#### **6.4.2.6 Transportation**

The Reduced Growth Alternative would reduce the amount of non-residential development within the proposed Community Corridors by approximately 10 to 15 percent compared to the project, and some portions of the Downtown Center and Highway Office/Commercial Concept Areas would retain their current land use designations. This would reduce VMT compared to the project. All other impacts would be similar to the project. Therefore, impacts related to transportation under the Reduced Growth Alternative would remain significant and unavoidable, and would be less compared to the project.

#### **6.4.2.7 Issues Found Less than Significant in the EIR**

As detailed in Section 6.2 above, impacts associated with a number of environmental topics were found to be less than significant in this EIR. While implementation of the Reduced Growth Alternative would shift land uses in certain areas of the city, it would still implement new 2021 GPU goals and policies, the Housing Element Update, and the CAP. All environmental topics found to be less than significant for the project in this EIR area are also anticipated to result in less than significant impacts under the Reduced Growth Alternative.

### **6.4.3 Conclusions**

As shown in Table 6-1, the Reduced Growth Alternative would result in the same significant and unavoidable impacts associated with agricultural resources, air quality, biological resources, cultural and tribal cultural resources, noise, and transportation. Reduced growth and VMT would incrementally reduce air quality emissions compared to the project. Reduction of the footprints of the Downtown Center and Highway Office/Commercial would incrementally reduce impacts related to agricultural resources, biological resources, and cultural and tribal cultural resources compared to the project. Impacts related to noise and transportation would be less compared to the project due to the reduction in VMT.

The Reduced Growth Alternative would not meet as many primary project objectives compared to the project. The elimination of employment opportunities would not accommodate job growth, build a diverse economy, improved rate of economic growth, or focus commercial uses in corridors to the same degree as the project.

## **6.5 Redistributed Growth Alternative**

### **6.5.1 Description**

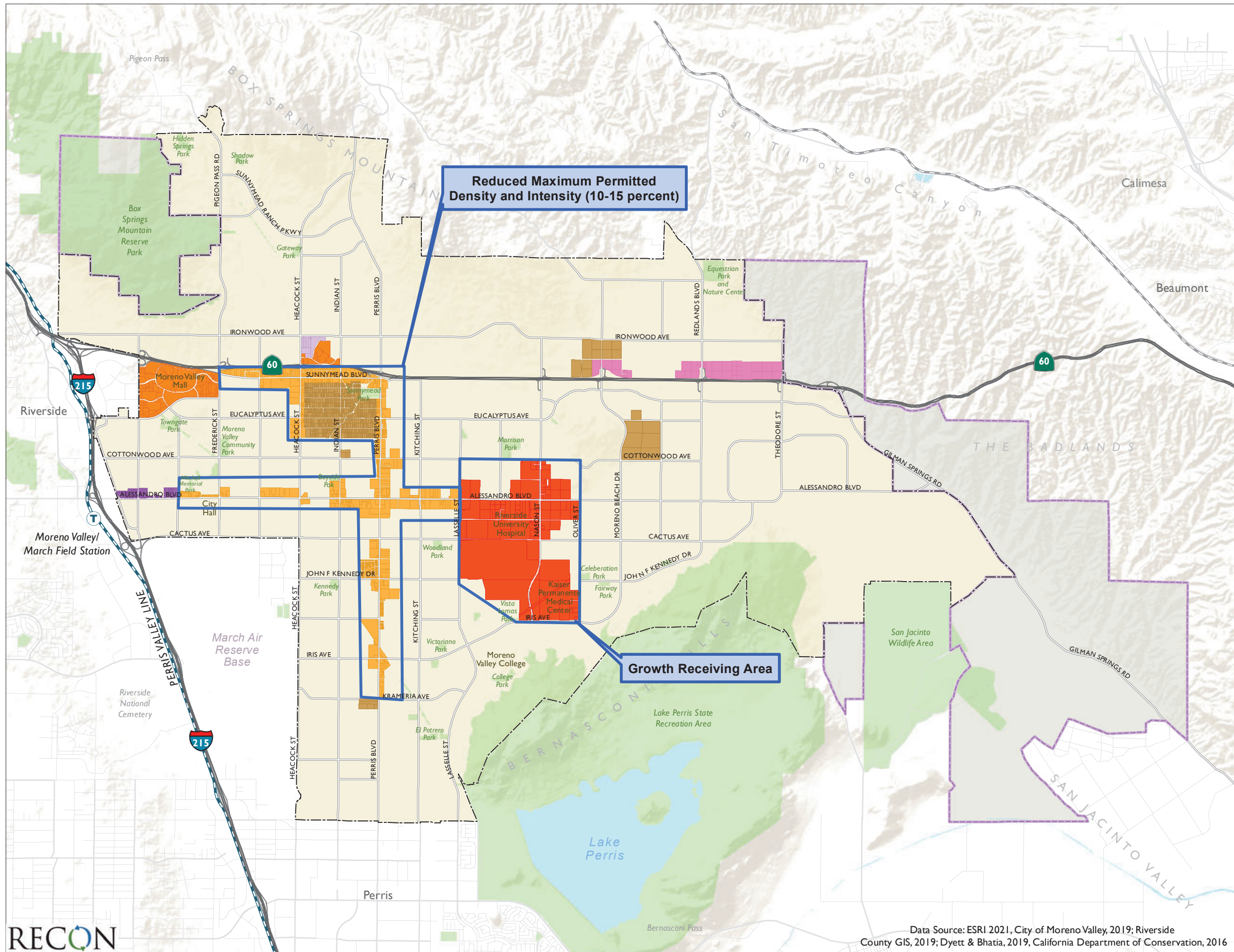
The Redistributed Growth Alternative would result in the same level of growth as the proposed plan, but would redistribute growth from the proposed Community Corridor Concept Areas to the Downtown Center Concept Area (Figure 6-2). This alternative would reduce the maximum permitted density and intensity in the Community Corridor Concept Areas, thereby reducing future development proposed along Sunnymead Boulevard, Alessandro Boulevard, Perris Boulevard, and Heacock Street by approximately 10 to 15 percent compared to the project. The reduced growth capacity from these areas would be redistributed to the Downtown Center Concept Area. This alternative would also remove a portion of the proposed Highway Office/Commercial Concept Area located north of SR-60 and the existing office and residential land use designations from the existing 2006 General Plan would be retained. Redistribution of land uses associated with this alternative would not alter the total amount of residential, commercial, and office land uses compared to the project.

### **6.5.2 Analysis**

#### **6.5.2.1 Agricultural Resources**

Under the project, agriculturally designated land within the Concept Areas would be converted to urban uses. These conversions would consist primarily of land designated as Farmland of Local Importance within the Downtown Center and Highway Office/Commercial Concept Area, as well as approximately 15 acres of Prime Farmland within the Highway Office/Commercial Concept Area. The loss of Prime Farmland within the Highway Office/Commercial Concept Area, as well as indirect loss throughout the Planning Area, would be considered significant and unavoidable.

The transfer of density from the Community Corridors to the Downtown Center would not affect impacts related to agricultural resources because the Downtown Center is already identified for development. The Reduced Growth Alternative would remove a portion of the Highway Office/Commercial Concept Area that is located on soils designated as Prime Farmland. However, this area, and others that are located on soils designated as Prime Farmland, could still be developed under their current land use designations established under the existing 2006 General Plan. While development would be less intense and could result in incrementally less conversion of existing Prime Farmland, the loss of agriculturally designated lands would be considered significant. There would be no feasible mitigation that would reduce the impact to a less than significant level. Therefore, impacts to agricultural resources under the Redistributed Growth Alternative would remain significant and unavoidable, and would be less than the project.



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- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes



**FIGURE 6-2**  
Redistributed Growth Alternative



### **6.5.2.2 Air Quality**

The project would not exceed the assumptions used to develop the AQMP, and the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. The project would not expose sensitive receptors to substantial pollutant concentrations, and would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people. The scale and extent of construction activities associated with buildout of the Planning Area could exceed the relevant SCAQMD thresholds for some projects, and impacts associated with criteria pollutants during construction were determined to be significant and unavoidable.

The Redistributed Growth Alternative would reduce permitted density and intensity within the proposed Community Corridors by approximately 10 to 15 percent, and transfer this development to the Downtown Center. This would further improve the Downtown Center as a mixed-use activity centers that is pedestrian-friendly community center linked to the regional transit system, which in turn would reduce VMT compared to the project. This in turn would reduce air quality emissions, ensuring that this alternative would not exceed the assumptions used to develop the AQMP, and would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. Similarly, the reduced emissions compared to the project would further avoid exposure of sensitive receptors to substantial pollutant concentrations, and further avoid potential impacts associated with odors. However, the scale and extent of construction activities associated with buildout under this alternative could exceed the relevant SCAQMD thresholds for some projects, and impacts associated with criteria pollutants during construction. Therefore, impacts related to air quality under the Redistributed Growth Alternative would remain significant and unavoidable, and would be less compared to the project.

### **6.5.2.3 Biological Resources**

Vegetation communities located within the Corridor Mixed Use and Highway Office/Commercial Concept Areas include developed/ disturbed and grassland (Highway Office/Commercial Concept Area). Development under the project would result in a loss of these habitats, as well as small swaths of Coastal sage scrub and riparian habitat within and adjacent to the Downtown Center Concept Area. While a mitigation framework is proposed, at a program level of analysis it is not possible to ensure that every impact could be fully mitigated. Therefore, the loss of sensitive habitat, both directly and indirectly, within the Concept Areas and throughout the Planning Area, would be considered significant and unavoidable.

The transfer of density from the Community Corridors to the Downtown Center would not affect impacts related to agricultural resources because the Downtown Center is already identified for development. The Reduced Growth Alternative would remove a portion of the Highway Office/Commercial Concept Area that has the potential to support sensitive species. However, this area could still be developed under their current land use designations

established under the existing 2006 General Plan. While development would be less intense and could result in an incrementally reduced impact to biological resources, impacts to sensitive species would be considered significant. Like the project, without specific development plans, there is no certainty that the implementation of mitigation measures would reduce the impact to a less than significant level. Therefore, impacts to biological resources, under the Redistributed Growth Alternative would remain significant and unavoidable, and would be less than the project.

#### **6.5.2.4 Cultural and Tribal Cultural Resources**

Figure 4.5-1 presents the locations of known historic resources within the Planning Area, while Figure 4.5-2 presents the locations of archeologically sensitive areas. Development under the project could result in a loss of known and currently unknown archeological and tribal cultural resources which is considered a significant impact. While a mitigation framework is proposed, at a program level of analysis it is not possible to ensure that every impact could be fully mitigated. Therefore, the potential loss of cultural and tribal cultural resources, both directly and indirectly, within the Concept Areas and throughout the Planning Area, would be significant and unavoidable.

The changes to the land use plan associated with the Redistributed Growth Alternative would not avoid any overlap with known historic resources or archaeologically sensitive areas. Additionally, development within the reduced Concept Areas and other areas subject to current land use designations established under the existing 2006 General Plan would have the potential to impact unknown historical, archaeological, and tribal cultural resources, which would be considered a significant impact. Like the project, without specific development plans, there is no certainty that the implementation of mitigation measures would reduce the impact to a level less than significant. Therefore, impacts to cultural and tribal cultural resources under the Redistributed Growth Alternative would remain significant and unavoidable, and would be similar to the project.

#### **6.5.2.5 Noise**

Under the project, the addition of proposed land use changes within the Concept Areas and residential density changes throughout the Planning Area would result in significant noise impacts due to increased ambient noise levels, noise/land use compatibility, and construction/vibration noise. While future development would be required to adhere to proposed 2021 GPU policies and implement mitigation measures, ambient noise and construction-related noise impacts would remain significant and unavoidable.

The Redistributed Growth Alternative would reduce permitted density and intensity within the proposed Community Corridors by approximately 10 to 15 percent, and transfer this development to the Downtown Center and transfer this growth to the Downtown Center Concept Area. This would in turn reduce VMT compared to the project, which could reduce ambient noise. All other impacts would be similar to the project. Therefore, impacts related to noise under the Redistributed Growth Alternative would remain significant and unavoidable, and would be less compared to the project.

### 6.5.2.6 Transportation

The Redistributed Growth Alternative would reduce permitted density and intensity within the proposed Community Corridors by approximately 10 to 15 percent, and transfer this development to the Downtown Center. This would further improve the Downtown Center as a mixed-use activity center that is pedestrian-friendly community center linked to the regional transit system, which in turn would reduce VMT compared to the project. All other impacts would be similar to the project. Therefore, impacts related to transportation under the Redistributed Growth Alternative would remain significant and unavoidable, and would be less compared to the project.

### 6.5.2.7 Issues Found Less than Significant in the EIR

As detailed in Section 6.2 above, impacts associated with a number of environmental topics were found to be less than significant for the project in this EIR. While implementation of the Redistributed Growth Alternative would shift land uses in certain areas of the city, it would still implement new 2021 GPU goals and policies, the Housing Element Update, and the CAP. All environmental topics found to be less than significant for the project in this EIR are also anticipated to result in less than significant impacts under the Redistributed Growth Alternative.

## 6.5.4 Conclusions

As shown in Table 6-1, the Redistributed Growth Alternative would result in the same significant and unavoidable impacts associated with air quality, agricultural resources, biological resources, cultural and tribal cultural resources, noise, and transportation. Reduction of the Highway Office/Commercial footprint would incrementally reduce impacts related to agricultural resources and biological resources compared to the project. Impacts related to cultural and tribal cultural resources would be the same because changes to the land use plan associated with the Redistributed Growth Alternative would not avoid any overlap with known historic resources or archaeologically sensitive areas. Impacts related to air quality, noise, and transportation would be less compared to the project due to the reduction in VMT.

The Redistributed Growth Alternative would meet most of the primary project objectives developed for the project. The redistribution of employment opportunities does not meet the objectives of creating high development corridors to the same degree as the project. Additionally, land since development within the Downtown Center will require significant planning effort before housing can be constructed, is not housing ready, and would not be able to accommodate as many housing units needed to achieve RHNA targets are more likely to be achieved within the key development corridors within the eight-year Housing Element planning horizon. However, it would still provide all the economic benefits anticipated from the project, as well as meet the other objectives.

## 6.6 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify the environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives. The project itself may not be identified as the environmentally superior alternative.

The Redistributed Growth Alternative is the environmentally superior alternative because it would incrementally reduce significant impacts associated with air quality, agricultural resources, biological resources, noise, and transportation. Although impacts related to cultural and tribal cultural resources would remain the same as this project, this alternative would reduce most significant impacts, but not to below a level of significance, while still meeting most objectives of the project. However, development ~~and~~ within the Downtown Center ~~is not housing ready, and~~ would take more time and investment to accommodate housing units needed to achieve RHNA targets compared to what could be achieved along the Community Corridors proposed under the project. Additionally, the higher density along community corridors is desired in order to activate these key corridors with a mix of uses that promote active community gathering places. Therefore, the Redistributed Growth Alternative is not recommended for adoption, since it would not likely achieve the same level of housing needed to satisfy the RHNA requirements of the project within the timeframe required and would not provide the same level of corridor activation.



## **Chapter 7**

# **Mitigation Monitoring and Reporting Program**

Section 15097 of the California Environmental Quality Act (CEQA) Guidelines requires that a Mitigation Monitoring and Reporting Program (MMRP) be adopted upon certification of an Environmental Impact Report (EIR; including associated Findings), to ensure that the associated mitigation measures are implemented. Table 7-1 identifies the mitigation measures and specifies the entity (or entities) responsible for monitoring and reporting. Pursuant to Public Resources Code Section 21081.6, an MMRP is only required for impacts identified as significant or potentially significant in the EIR analysis. The environmental analysis resulted in the identification of a programmatic mitigation framework, which would reduce potentially significant impacts, but not to below a level of significance for all the environmental topics. Programmatic mitigation measures have been identified for air quality, biological resources, cultural and tribal cultural resources, Geology/Soils, and noise.

**Table 7-1  
Mitigation Monitoring and Reporting Program**

Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
<b>4.3 Air Quality</b>			
<p><b>AQ-1:</b> Applications for future development, wherein the Director of Community Development or his or her designee has determined a potential for air quality impacts associated with construction, shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City for review and approval. The Director of Community Development or his or her designee shall make this determination based on the size of the project, whether the project would require a transportation impact analysis, or other criteria. The evaluation shall be prepared in conformance with South Coast Air Quality Management District (SCAQMD) methodology for assessing air quality regional and local impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SCAQMD's adopted regional and localized construction CEQA thresholds of significance, the City shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City. Mitigation measures to reduce construction-related emissions could include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Require fugitive-dust control measures that exceed SCAQMD's Rule 403 requirements, such as: <ul style="list-style-type: none"> <li>○ Use of nontoxic soil stabilizers to reduce wind erosion.</li> <li>○ Apply water every four hours to active soil-disturbing activities.</li> <li>○ Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.</li> </ul> </li> <li>• Encourage the use of construction equipment equal to or greater than 50 horsepower be electrically powered or alternatively fueled. At a minimum, use construction equipment rated by the United States Environmental Protection Agency as having Tier 4 Final (model year 2008 or newer) emission limits. Include this requirement in applicable bid documents, purchase orders, and contracts.</li> <li>• Ensure that construction equipment is properly serviced and maintained to the manufacturer's standards.</li> <li>• Limit nonessential idling of construction equipment to no more than five consecutive minutes.</li> <li>• Limit on-site vehicle travel speeds on unpaved roads to 15 miles per hour.</li> <li>• Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area.</li> <li>• Use Super-Compliant VOC paints for coating of architectural surfaces whenever possible. A list of Super-Compliant architectural coating manufactures can be found on the SCAQMD's website.</li> </ul>	<p>Technical analysis required prior to project approval.</p>	<p>City</p>	
<b>4.4 Biological Resources</b>			
<p><b>BIO-1:</b> Applications for future development of vacant properties (and portions thereof), wherein the Director of Community Development or his or her designee has determined a potential for impacts to sensitive biological resources, shall be required to prepare a site-specific general biological resources survey to identify the presence of any sensitive biological resources, including any sensitive plant or wildlife species. The report shall identify the need for focused presence/absence surveys and identify the presence of state or federal regulated wetlands or waters. If potentially significant impacts to sensitive biological resources, including sensitive species and/or wetlands are identified, the report shall also recommend appropriate mitigation to reduce the impacts to below a level of significance.</p>	<p>Technical analysis required prior to project approval.</p>	<p>City/Qualified Biologist</p>	
<p><b>BIO-2:</b> Applications for future development, wherein the Director of Community Development or his or her designee has determined a potential for impacts to mature trees and/or native vegetation suitable for nesting birds, shall be required to restrict removal of sensitive habitat and vegetation to outside the breeding seasons of any sensitive species identified within adjacent properties (typical bird breeding season is February 1–September 1. as early as January 1 for some raptors). If vegetation clearing must begin during the breeding season, a qualified biologist shall provide recommendations to avoid impacts to nesting birds which typically includes a pre-construction survey within 3 days of the start of construction to determine the presence of active nests.</p> <p>If active nests are found, avoidance measures shall be implemented to ensure protection of the nesting birds. Avoidance measures may include a no-activity buffer zone, typically 300 feet from the area of disturbance or 500 feet for raptors, established at the discretion of the qualified biologist in consultation with the City. If activity buffer zones are not feasible, temporary noise barriers may be installed to attenuate construction noise. Noise wall height and adequacy shall be supported by a noise analysis to determine the anticipated construction noise levels with attenuation measures as recommended by the biologist and approved by the City. Periodic noise monitoring shall be conducted during construction to ensure noise attenuation standards are met. Accepted noise levels are species dependent and existing ambient noise levels can play a factor in establishing baseline acceptable noise.</p>	<p>Technical analysis required prior to project approval.</p>	<p>City/Qualified Biologist</p>	
<b>4.5 Cultural and Tribal Cultural Resources</b>			
<p><b>CUL-1:</b> Prior to the issuance of any permit for a future development site-specific project that would directly or indirectly affect a building/structure in excess of 50 years of age, the City or a qualified architectural historian shall determine whether the affected building/structure is historically significant. The evaluation shall be based on criteria such as age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the CEQA guidelines. If the evaluation determines that building/structure is not historic, no further evaluation or mitigation would be required. If the building/structure is determined to be historically significant, the preferred mitigation would be to avoid the resource through project redesign. If the</p>	<p>Technical analysis required prior to project approval.</p>	<p>City/Qualified Architectural Historian</p>	

**Table 7-1  
Mitigation Monitoring and Reporting Program**

Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
resource cannot be avoided, all prudent and feasible measures to minimize or mitigate harm to the resource shall be taken per recommendations of the qualified architectural historian.			
<p><b>CUL-2:</b> Prior to issuance of any permit for a future site-specific project that would potentially have a direct or indirect affect an archaeological resource, the City shall require the following steps be taken to determine: (1) the presence of archaeological resources, and (2) the appropriate mitigation for any significant resources which may be impacted by project development. The following steps would help determine the presence or absence of archaeological resources.</p> <p>Step 1: An archaeologist shall conduct records and background research at the Eastern Information Center for a list of recorded resources and request a sacred lands file search from the Native American Heritage Commission.</p> <p>Step 2: After review of this data, a pedestrian survey shall be conducted by a qualified archaeologist.</p> <p>Step 3: If through the research and the field survey, archaeological resources are identified, then an evaluation of significance shall be completed by a qualified archaeologist. The evaluation program generally will include excavation to determine depth, extent, integrity, and content of the subsurface cultural material.</p> <p>Step 4: The results of the excavation will be evaluated using the Thresholds above in Section 4.5.4.</p> <p>Step 5: If an archaeological resource is determined significant and avoidance through project redesign is not feasible, a data recovery and construction monitoring program must be implemented to reduce the impacts the archaeological resource to below a significant level. The data recovery program must be approved by the City.</p> <p>Step 6: A final data recovery and/monitoring report shall be completed in accordance with the California Office of Historic Preservation’s Archaeological Resource Management Reports: Recommended Content and Format. Confidential attachments must be submitted under separate covers. Artifacts collected during the evaluation and data recovery phases must be curated at an appropriate facility consistent with state (California State Historic Resources Commission’s Guidelines for Curation of Archaeological Collection 1993) and federal curation standards (36 CFR 79 of the Federal Register) and that allows access to artifact collections.</p>	Technical analysis required prior to project approval.	City/Qualified Archaeologist	
<p><b>CUL-3:</b> If human remains are unintentionally disturbed during archaeological excavations or construction activities, implementation of the procedures set forth in PRC Section 5097.98 and California State Health and Safety Code 7050.5 would be implemented in consultation with the MLD as identified by the NAHC. California State Health and Safety Code Section 7050.5 dictates that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined by the County Coroner to be Native American, the NAHC shall be notified within 24 hours. The NAHC shall identify the MLD with whom consultation shall occur to determine in the treatment and disposition of the remains.</p>	During Construction	City/Qualified Archaeologist	
<b>4.7 Geology/Soils</b>			
<p><b>PAL-1:</b> Applications for future development, wherein the Community Development Director or his or her designee has determined a potential for impacts to paleontological resources, shall review the underlying geology and paleontological sensitivity of the site. If it is determined that the potential exists that sensitive paleontological resources are present, the applicant shall be required to comply with the following mitigation framework.</p> <p>A qualified paleontological monitor shall be present during grading in project areas where a project specific geological technical study has determined that such monitoring is necessary due to the potential for paleontological resources to reside within the underlying geologic formations. The geologic technical study shall also provide specific duties of the monitor, and detailed measures to address fossil remains, if found.</p>	During Construction	City/Qualified Paleontologist	
<b>4.13 Noise</b>			
<p><b>NOS-1:</b> The Director of Community Development or his or her designee shall require applicants to demonstrate whether the project has the potential to exceed noise standards contained in Sections 8.14.040(E) and 11.80.030(D)(7) of the Municipal Code. If a project may exceed standards or is located adjacent to sensitive receptors, the City may require the applicant to prepare a Noise Analysis that estimates construction noise and identifies noise reduction measures that would ensure compliance with Municipal Code standards. Construction plans submitted to the City shall identify applicable measures on demolition, grading, and construction plans submitted to the City. Noise reduction measures can include, but are not limited to, the following:</p> <ol style="list-style-type: none"> <li>1. Demolition, construction, site preparation, and related activities that would generate noise perceptible at the property line of the subject property are limited to the hours between 7:00 a.m. to 7:00 p.m. from Monday through Friday excluding holidays and from 8:00 a.m. to 4:00 p.m. on Saturdays. The building inspector may issue an exception to this limitation on hours in cases of urgent necessity where the public health and safety will not be substantially impaired.</li> <li>2. Idling times for noise-generating equipment used in demolition, construction, site preparation, and related activities shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes.</li> <li>3. Demolition, construction, site preparation, and related activities within 70 feet from the edge of properties with existing, occupied noise-sensitive uses shall incorporate all feasible strategies to reduce noise exposure for noise-sensitive uses, including:</li> </ol>	Technical analysis required prior to project approval.	City	

**Table 7-1  
Mitigation Monitoring and Reporting Program**

Mitigation Measure	Timing of Verification	Responsible for Verification	Status/Date/Initials
<p>a. Provide written notice to all known occupied noise-sensitive uses within 400 feet of the edge of the project site boundary at least 2 weeks prior to the start of each construction phase of the construction schedule;</p> <p>b. Ensure that construction equipment is properly maintained and equipped with noise control components, such as mufflers, in accordance with manufacturers' specifications;</p> <p>c. Re-route construction equipment away from adjacent noise-sensitive uses;</p> <p>d. Locate noisy construction equipment away from surrounding noise-sensitive uses;</p> <p>e. Use sound aprons or temporary noise enclosures around noise-generating equipment;</p> <p>f. Position storage of waste materials, earth, and other supplies in a manner that will function as a noise barrier for surrounding noise-sensitive uses;</p> <p>g. Use the quietest practical type of equipment;</p> <p>h. Use electric powered equipment instead of diesel or gasoline engine powered equipment; Use shrouding or shielding and intake and exhaust silencers/mufflers; and</p> <p>i. Other effective and feasible strategies to reduce construction noise exposure for surrounding noise-sensitive uses.</p> <p>4. For construction of buildings that require the installation of piles, an alternative to installation of piles by hammering shall be used. This could include the use of augured holes for cast-in-place piles, installation through vibration or hydraulic insertion, or another low-noise technique.</p>			
<p><b>NOS-2:</b> Prior to issuance of a building permit for a project requiring pile driving during construction within 135 feet of fragile structures, such as historical resources, 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings), or within 75 feet of engineered concrete and masonry (no plaster); or a vibratory roller within 25 feet of any structure, the project applicant shall prepare a noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these activities. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 inches per second [in/sec] peak particle velocity [PPV] for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving and static rollers as opposed to vibratory rollers shall be used. If necessary, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded.</p>	<p>Technical analysis required prior to project approval.</p>	<p>City</p>	





## **Chapter 8**

### **EIR References**

#### **8.1 Persons Involved in the Preparation of the EIR**

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MORENO VALLEY  
WHERE DREAMS SOAR