CITY OF MORENO VALLEY

INITIAL STUDY FOR PENSKE SALES, LEASING, AND MAINTENANCE FACILITY

Penske Sales, Leasing, and Maintenance Facility Project

March 2024

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

Prepared By
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APPENDICES (Separate Documents)

INITIAL STUDY FOR PENSKE SALES, LEASING, AND MAINTENANCE FACILITY

BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. **Project Case Number(s):** PEN22-0250 – Plot Plan

2. **Project Title:** Penske Sales, Leasing, and Maintenance Facility

3. **Public Comment Period:** **March 15, 2024 to April 15, 2024**

4. **Lead Agency:** City of Moreno Valley
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5. **Documents Posted At:** https://moval.gov/cdd/documents/about-projects.html

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7. **Project Sponsor:**

Applicant/Developer	**Property Owner**
Penske Truck Leasing Company	Penske Truck Leasing Company
Mike Barnes, Director of Facilities	Mike Barnes, Director of Facilities
1711 W. Greentree Drive, Ste. 117	1711 W. Greentree Drive, Ste. 117
Tempe, AZ 85284	Tempe, AZ 85284
Penske Truck Leasing Company	Penske Truck Leasing Company

8. **Project Location:** 21839 ALESSANDRO BLVD, MORENO VALLEY, CA 92553

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

10. **Specific Plan Name and Designation:** None

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

12. **Surrounding Land Uses and Setting:** Land uses surrounding the project site include Commercial to the north, Business Park/Light Industrial uses to the east

and south, and the city boundary and Interstate 215 freeway to the immediate west of the project site. The Penske Sales, Leasing, and Maintenance Facility is located on an approximately 9.63-acre site. The site is currently disturbed.

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

Environmental Setting

Project Location

The Penske Sales, Leasing, and Maintenance Facility Project is located at 21839 Alessandro Boulevard in Moreno Valley, California. The project site contains approximately 9.63 acres and is located at the southeast corner of Old 215 Frontage Road and Alessandro Boulevard. Refer to **Figure 1**, which shows the project's regional location. Streets surrounding the site include Alessandro Drive to the north, Interstate 215 to the west, Cactus Avenue to the south, and Day Street to the east. See **Figure 2**, which shows the project's location.

Project Setting

The project site is comprised of the assessor's parcel numbers (APNs) 297-120-025, 297-100-091, 297-120-002, 297-120-003, 297-120-017, 297-120-018, 297-100-073, and 297-100-076. The project site is adjacent to parcels with similar transportation-related business park/light industrial uses to the east and south and commercial uses to the north. Located to the west of the project site are the city boundary and the I-215 freeway. **Figure 3** shows the topography of the site, while **Figure 4** contains photos of the site in its current condition.

Land Use and Zoning

The general plan land use designation and zoning designation of the project site and surrounding areas are listed in **Table 1**. The General Plan designation for the project site is Business Park/Light Industrial and the site's zoning designation is Business Park (BP).

Table 1 - Summary of Land Use and Zoning

Location	General Plan	Zoning	Existing Use
Project Site	Business Park / Light Industrial	Business Park	Truck trailer parking/storage
Surrounding Areas			
North	Commercial	Commercial	Auto repair shop, Community Health Systems facility
East	Business Park / Light Industrial	Industrial / Business Park	Towing Company, auto repair/transmission shop, U-Haul and self-storage facility
West	Not applicable (City of Riverside)	Not applicable (City of Riverside)	Industrial
South	Business Park / Light Industrial	Industrial / Business Park	Concrete supplier

Source: UltraSystems, 2022.

Figure 1 - Regional Location

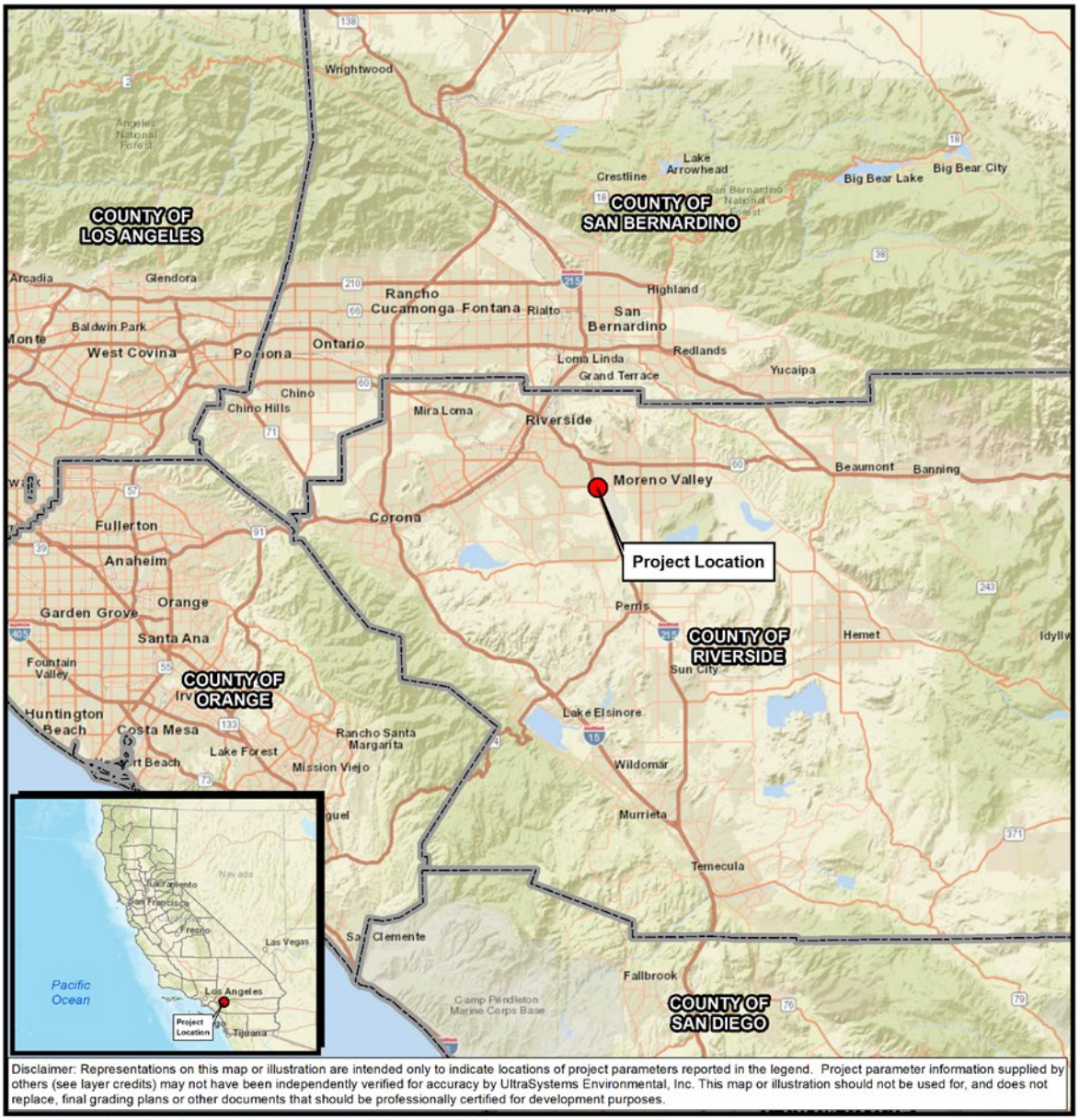

Figure 2 - Project Location

Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\GISSVR\gis\Projects\7110_Penske_Truck_Leasing_IS_MND\MXDs\7110_Penske_3_0_Project_Location_2021_09_14.mxd October 05, 2021

Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors; UltraSystems Environmental, Inc., 2021

Scale: 1:4,200

N

0 175 350 Feet

0 50 100 Meters

Legend

Project Boundary

Penske Sales, Leasing, and Maintenance Facility

Project Location

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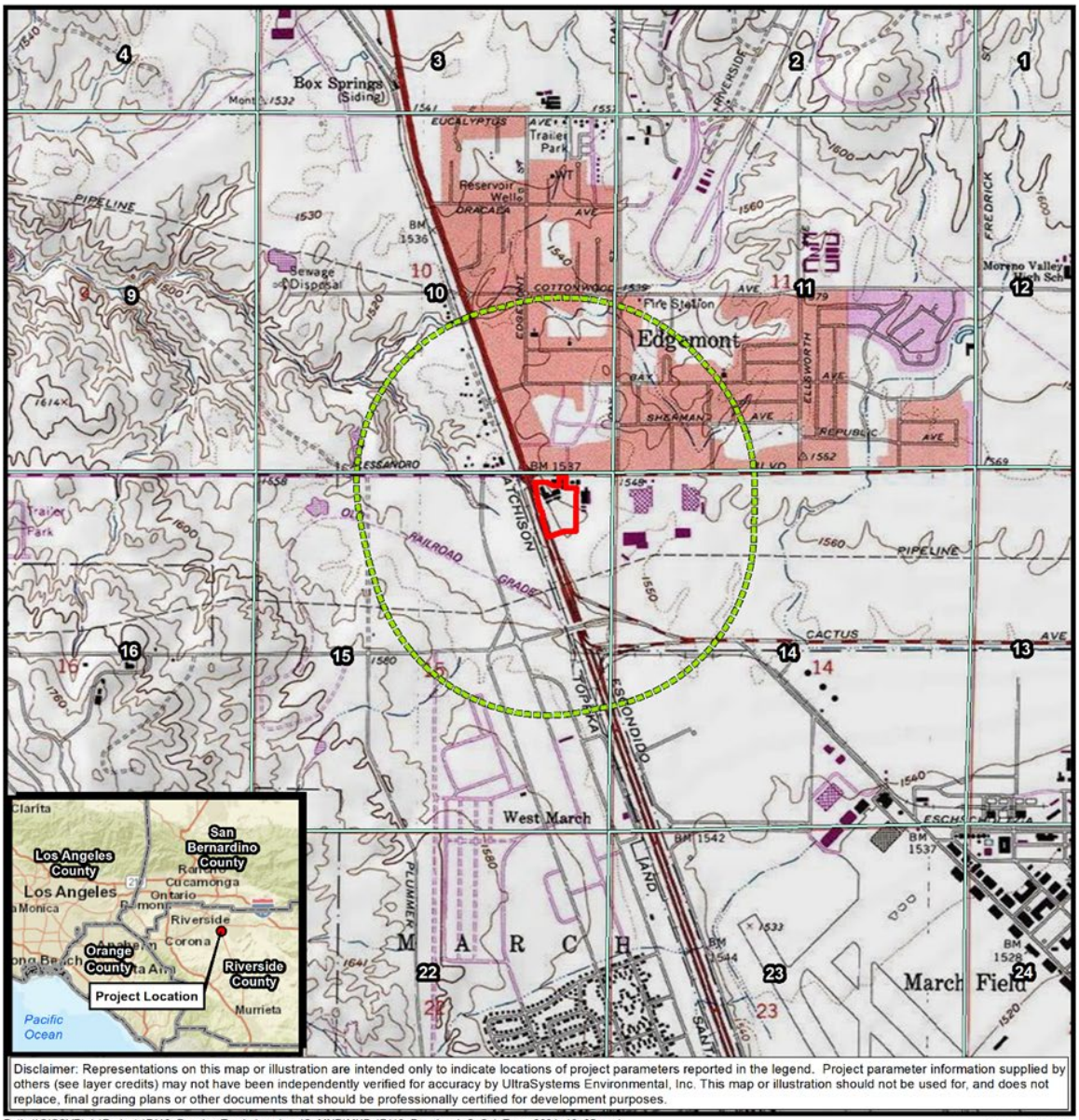
Figure 3 - Topographic Map



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October 05, 2021

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Scale: 1:24,000

N

0 1,000 2,000 Feet

0 250 500 Meters

Legend

- Project Boundary
- Half-Mile Radius
- Section Boundary

Penske Sales, Leasing, and Maintenance Facility

Topographic Map
USGS Quadrangle: Riverside East
Township: 3S Range: 4W
Section: 15

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Figure 4 - Project Site Photographs

PHOTO 1: View looking north across the project site showing truck trailers with Box Springs Mountains in background

PHOTO 2: View looking south across the project site showing truck trailers; the building in the background is industrial use offsite.

PHOTO 3: View looking southwest across the project site showing industrial uses off-site

PHOTO 4: View looking east across the project site showing truck trailers on the left and industrial uses off-site in the background

Existing Characteristics of the Site

Climate and Air Quality

The project site is within the South Coast Air Basin (SCAB), a 6,600 square-mile area encompassing all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. A persistent high-pressure area that commonly resides over the eastern Pacific Ocean dominates regional meteorology. The distinctive climate of this area is determined primarily by its terrain and geographic location. The local climate is characterized by warm summers, mild winters, infrequent rainfall, moderate daytime onshore breezes, and moderate humidity. Ozone and pollutant concentrations tend to be lower along the coast, where the constant onshore breeze disperses pollutants toward the inland valleys. However, the SCAB fails to meet national ambient air quality standards for ozone and fine particulate matter ($PM_{2.5}$) and is classified as “a nonattainment area” for those pollutants.

Geology and Soils

The City of Moreno Valley is surrounded by the Badlands hills to the east, State Route 215 to the west, Box Springs Mountains to the north, and Lake Perris State Recreation Area to the south. The City lies on a bedrock known as the Perris Block, which is located within the Peninsular Range Geomorphic Province, one of the major geologic provinces of Southern California. The Perris Block is a large mass of granitic rock surrounded by the San Jacinto Fault, the Elsinore Fault, and the Santa Ana River. The Perris Block has had a history of vertical land movements of several thousand feet due to shifts in the Elsinore and San Jacinto Faults. The rocky, mountainous areas of the planning area, including the Box Springs Mountains and the Mount Russell/Lake Perris State Recreation Area, have an underlying granitic bedrock that consists of quartz diorite and displays granite rock outcrops and large boulders. The five soil types in the region consist of: Monserate-Arlington-Exeter; Hanford-Tujunga-Greenfield; Cieneba-Rock Land-Fallbrook; San Emigdio-Grangeville-Metz; and the Badlands-San Timoteo. Some of the listed soils have poor stability and are commonly associated with being at risk to collapse during a flash flood (Moreno Valley General Plan, 2021, pages 5.6-2 to 3).

Hydrology

The project site is currently undeveloped and therefore, under existing conditions, stormwater runoff from the project site ponds onsite and sheet flows to the northwest and offsite to catch basins near the intersection of Alessandro Boulevard and Old 215 Frontage Road. The Eastern Municipal Water District (EMWD) supplies water to the project site. The project site is mostly bare land and used for truck storage; the site is not used for intentional groundwater recharge. The project site is over the San Jacinto Groundwater Basin (DWR, 2021). At project completion, the project site would be approximately 83 percent impervious.

At project completion, runoff from the site would enter the proposed storm drains that discharge to three proposed modular wetland systems (MWS), one in the northwest quadrant of the site and the other two in the south-central part of the site (Kimley Horn, 2021). The three MWS would treat the design capture volumes totaling approximately 1.48 cubic feet per second. Stormwater flows exceeding that rate would bypass the MWS. After passing through the MWS, the runoff would be conveyed into a proposed underground detention system in the west-central part of the site.

Biology

Most of the BSA is located within the Reche Canyon/Badlands Area Plan of the MSHCP. The western edge of the project area is within the Lake Matthews/Woodcrest Area Plan; however, the BSA does not fall within any criteria cells, conservation areas, wildlife movement corridors, or linkages. The MSHCP does not have survey requirements for this area.

A mixture of industrial, commercial, and business park surrounds the project site. The project site is in a moderately urbanized area that provides low-value habitat for special-status plant and wildlife species. Developed surfaces and natural substrates are dominated by non-native, ornamental vegetation. The disturbed land cover consists of areas that have been leveled, cleared, or otherwise altered.

Although the primary biological resource that would potentially be impacted by the construction of the project is wildlife species, other resources may be impacted by the project. To comply with MSHCP requirements, various BMPs, and other mitigation measures will be implemented so that impacts on biological resources covered by the MSHCP would be less than significant.

Public Services

The City of Moreno Valley is served by a full range of public services and utilities.

The Moreno Valley Fire Department (MVFD) is the primary response agency for fires, emergency medical services, hazardous materials incidents, traffic accidents, terrorist acts, catastrophic weather events, and technical rescues for the City of Moreno Valley. The Moreno Valley Fire Department (MVFD) is part of the CALFIRE/Riverside County Fire Department's regional, integrated, cooperative fire protection organization. Riverside County Fire Department (RCFD) provides fire protection and emergency medical services to the city of Moreno Valley including the project site, through contracts between the City of Moreno Valley, the Riverside County Fire Department, and the California Department of Forestry and Fire Protection (CAL FIRE). MVFD operates seven fire stations.

The Moreno Valley Police Department (MVPD) provides law enforcement services and coordinates the overall operations of the Police Department including patrol, traffic enforcement, crime prevention, detective unit, and special enforcement. The City of Moreno Valley contracts police services from the Riverside County Sheriff's Department. MVPD is organized into five divisions: Administration, Detective, Patrol, Special Enforcement, and Traffic. The Patrol Division is staffed by nine sergeants, 64 sworn patrol officers, three K-9 teams, and 10 nonsworn officers (Recon, 2021).

The Moreno Valley Unified School District (MVUSD) operates 23 elementary schools, six middle schools, and five high schools; districtwide enrollment in the 2020-21 school year was 31,597 (CDE, 2022). MVUSD encompasses approximately 76 square miles including most of the city of Moreno Valley, part of the city of Riverside, and surrounding areas of unincorporated Riverside County.

The City of Moreno Valley Parks and Community Services Department maintains 35 parks totaling approximately 482 acres. Demands for park facilities and services are generated by the population in the parks' service areas. The project does not propose residential development and would not increase the population in the project region.

The Moreno Valley Public Library (MVPL) provides library services to the city of Moreno Valley. MVPL operates three library facilities (MVPL, 2022). Demands for library facilities and services are also generated by the population in the libraries' service areas. The project does not propose residential development and would not increase the population in the project region.

Utilities

The Eastern Municipal Water District (EMWD) supplies water to the project site. EMWD water supply in the project region is from northern California and imported via the State Water Project (EMWD, 2020). Water is treated at the Metropolitan Water District's Mills Filtration Plant in the City of Riverside, which has a capacity of 220 million gallons per day (MWD, 2021).

Wastewater treatment for the project site is in the service area of EMWD's Moreno Valley Regional Water Reclamation Facility (MVRWRF). The MVRWRF has a capacity of 17,900 acre-feet per year (afy), treated 10,451 afy of wastewater in 2020, and had a residual capacity in 2020 of 7,449 afy (EMWD, 2021). The estimated project wastewater generation is approximately 13,022 gallons per day or 14.6 acre-feet per year. Sufficient wastewater treatment capacity is available in the region for the project's wastewater generation.

Stormwater drainage for the project will be managed by various drainage improvements including storm drains and storm drain inlets, modular wetland systems, and an underground detention system consisting of plastic pipes. The detention system would outlet to a proposed pump that would pump stormwater up to an existing 24-inch storm drain onsite. The proposed storm drain improvements would limit runoff flow rates from the site at project completion to no greater than existing rates.

The Moreno Valley Utility (MVU) provides electricity to the project site. During the fiscal year 2019/2020, MVU provided approximately 202 gigawatt-hours of electricity to its customers (MVU 2020). The project site is in an urbanized area with existing electric distribution lines. The project would be constructed in accordance with all applicable Title 24 regulations, and project development would not require the construction or relocation of electric power facilities.

The Southern California Gas Company (SoCalGas) is the primary distributor of retail and wholesale natural gas across Southern California, including the City of Moreno Valley. SoCalGas expects total gas demand to decline 0.74 percent annually from 2020 to 2035 as a result of energy-efficiency standards and programs, renewable electricity goals, modest economic growth in its service region, and advanced metering infrastructure (California Gas and Electric Utilities, 2022, p. 66). The anticipated natural gas supply is adequate to meet demand in the SoCalGas region, and the proposed project is not expected to impact this determination.

Telecommunication services, including internet, phone, and television for the project site, are provided by AT&T, Verizon, Crown Castle, Questar, and Spectrum (digalert.org, 2021). The project construction contractor would contact the Underground Service Alert of Southern California ("Digalert") at least two days before beginning soil disturbance, pursuant to California Government Code § 4216. Any relocation of underground utilities onsite or next to the site for the installation of new utility laterals connecting to existing utilities would be conducted at the expense of the project applicant and under permission from the utility's owner. The proposed project would not interfere with the operation of existing utility facilities, and the impacts would be less than significant.

Waste Management, Inc. collects solid waste from businesses and residents in the City of Moreno Valley under contract with the City. In 2019, the latest year for which data are available, approximately 97 percent of solid waste landfilled from the City of Moreno Valley was disposed of at two facilities, Badlands Sanitary Landfill near the City of Moreno Valley, and El Sobrante Landfill near the City of Corona. The project is estimated to generate 47 tons of solid waste annually.

Project Description

The City of Moreno Valley (City) is processing an application seeking Plot Plan approval for a proposed truck sale, rental, service, and fueling facility on a 9.63-acre site (refer to **Table 2** for APN numbers) at the southeast corner of the Interstate 215 Frontage Road and Alessandro Boulevard in the City of Moreno Valley.

Penske Truck Leasing Co, L.P. ("Penske") is proposing to construct a new state-of-the-art six-bay service facility (with a 2,032-square-foot office core) and wash bay in addition to a rental and sales office building (with a 1,792-square-foot office core) and an associated two-lane, three product (gasoline, diesel, diesel exhaust fluid) fuel island located in Moreno Valley, CA. The proposed project would be located at Highway 215 Frontage Road, close to Alessandro Boulevard to the north. The roughly rectangular site for the proposed project is currently developed and is used for truck storage.

Parts of the project site are used for storage of truck trailers and a small wooden shed is present in the northeast corner of the site; the site is otherwise vacant.

The site is surrounded by commercial uses (a transmission business, an equipment rental business, and a self-storage business) to the north; a concrete business to the south; truck parking to the east; and the I-215 frontage road and freeway to the west.

Table 2 - Project Site Parcels

Parcels (APN Number)	Acres
297-120-025	3.94
297-100-091	3.15
297-120-002	0.16
297-120-003	0.13
297-120-017	0.32
297-120-018	0.32
297-100-073	0.64
297-100-076	0.97
Total	**9.63**

The City's General Plan land use designation for the project site is Business Park / Light Industrial, which allows manufacturing, research and development, warehousing and distribution, as well as office and support commercial activities, with a floor area ratio not exceeding 1.0 (City of Moreno Valley, 2021).

The zoning district for the proposed site is Business Park (BP), which allows light industrial, research and development, office-based firms and limited supportive commercial uses (City of Moreno Valley Municipal Code Section 9.05.020; City of Moreno Valley, 2021).

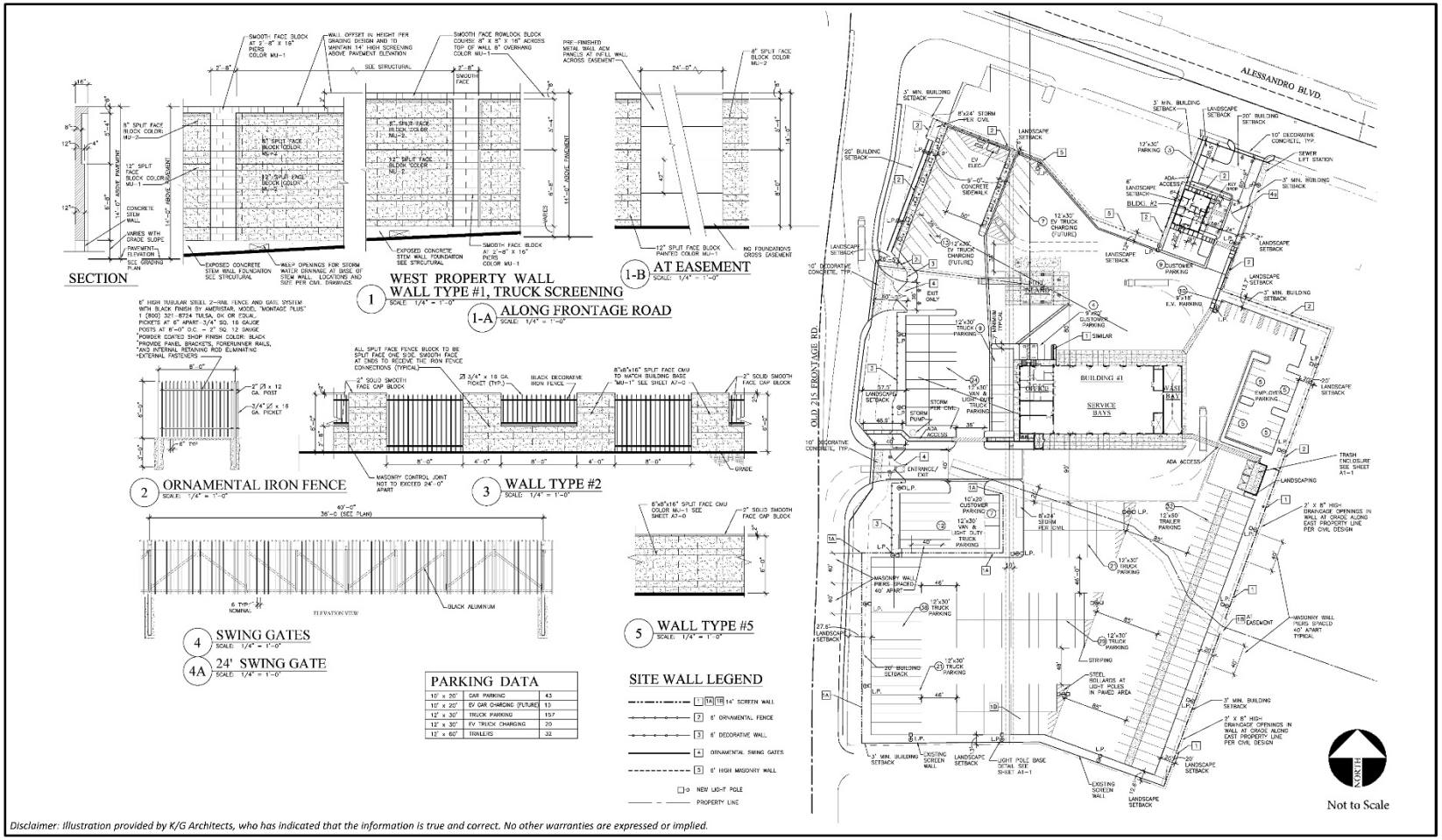
Project Overview

The project proposes two buildings: 1) a service and wash building with office space in the middle of the project site; and, 2) a rental and sales office building in the northern part of the site. **Table 3** summarizes the proposed project features, and **Figure 5** depicts the proposed project site plan.

Table 3 - Project Summary

New Construction	Proposed Uses/Features	Area (Square Feet)	No. of Stories
Building 1	Service facility (repair garage/storage/wash bay) Office *Total*	17,168 2,032 **19,200**	1
Building 2	Rental and sales office	1,792	
Buildings 1 and 2, total	Not applicable	**20,992**	
Underground Storage Tanks	1. 2,000-gallon diesel exhaust fluid tank 2. 20,000-gallon diesel fuel tank 3. 4,000-gallon gasoline fuel tank	Not Applicable	Not Applicable
Fuel Island	Fueling station with two lanes dispensing three products (gasoline, diesel, diesel exhaust fluid)	1,936	Not Applicable
Onsite parking	Parking Spaces: Customer Employee Electric Vehicle (EV) Truck (12x30) EV Truck (12x30) Trailer (12x60)	 20 spaces 30 spaces 10 spaces 157 spaces 20 Spaces 32 spaces	Not Applicable

Figure 5 - Proposed Site Plan



Disclaimer: Illustration provided by K/G Architects, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: K/G Architects, September 15, 2023.

Penske Sales, Leasing, and Maintenance Facility

Site Plan

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Proposed Project Features

New Construction

Buildings

Building 1, in the central part of the project site, would include office space, service bays, and a wash bay and would total approximately 19,200 square feet in building area. The service facility consisting of wash and service bays and storage/utility rooms would be approximately 17,168 square feet; the office space would be 2,032 square feet. One of the storage/utility rooms would contain three aboveground tanks: a 1,000 and 500-gallon tanks for new oil, and a 1,000-gallon used oil tank.

Building 2, in the northern part of the site, would house a rental and sales office with an area of approximately 1,792 square feet.

Fuel Island

A two-lane, three-product fuel island for gasoline, diesel, and diesel exhaust fluid would be provided in the north-central part of site.

Project Operations

Services

The facility would provide the following five services:

- Local one-way rentals to the general public and commercial industry;
- Full-service lease, including maintenance, of semi-truck tractors and trailers, and box trucks, for terms of four to six years; these vehicles are sold after the ends of the leases.
- Used truck sales;
- Contract maintenance (on vehicles subject to contract between owners and Penske), and

Maintenance, fueling and washing of Penske vehicles and vehicles under contract maintenance. Maintenance, washing, and fueling would not be available to the general public.

Truck and trailer repairs for Penske rental trucks, full-service lease vehicles, and contract maintenance vehicles would consist of general and preventative maintenance such as clutches, oil changes, belt/bulb replacements, tune-ups, tire changes, etc. No major work such as framework, collision repair or body shop work, etc. would be done.

Operating Hours:

The facility would operate 6:00 a.m. to midnight Monday through Friday, 7:00 a.m. to 4:00 p.m. Saturday, and 7:00 a.m. to 12:00 noon Sunday, as shown below in **Table 4**.

Table 4 - Anticipated Operating Hours

Function	Days	Hours
Service	Monday through Friday	6:00 a.m. to 12:00 midnight
	Saturday	7:00 a.m. to 4:00 p.m.

	Sunday	7:00 a.m. to 12:00 noon
Rental	Monday through Friday	7:00 a.m. to 6:00 p.m.
	Saturday	7:00 a.m. to 4:00 p.m.
	Sunday	7:00 a.m. to 12:00 noon

Shift	Hours	Category	Number
Day	6:00 a.m. to 3:00 p.m.	diesel technicians and service staff	15
		office staff (rental, leasing, sales)	3
		Subtotal	**18**
2nd	3:00 p.m. to 12:00 midnight	diesel technicians including 1 supervisor	12
		Office staff	1
		Subtotal	**13**
Total	Not applicable	Not applicable	**31**

Site Access, Circulation and Parking

Access and Circulation

Site access would be via one driveway from Alessandro Boulevard and two driveways from the Old 215 Frontage Road. The southerly driveway along Frontage Road would allow both entrance and exit; exit only for right turns on the northbound side of the Frontage Road, which is a divided roadway. The northerly driveway along Frontage Road would be exit only and only for right turns onto the roadway.

Parking

The project would provide 50 car spaces (20 customer spaces and 30 employee spaces); 157 truck spaces (12 x 30 feet); and 32 trailer spaces (12 x 60 feet). The project would also provide 10 Electric Vehicle (EV) car parking spaces and 20 EV Truck parking spaces. Approximately two-thirds of the parking spaces would be along the site perimeter.

Fuel Island

The proposed project includes a two-lane fuel island in the north-central part of the project site. The fuel island would be approximately 40 feet by 40 feet. The fuel island would include three fuel tanks, described below. A canopy approximately 114 feet long by 44 feet wide would be installed over the fuel island.

Underground Storage Tanks

The project proposes three underground storage tanks: 1) a 20,000-gallon double-wall diesel tank; 2) a 4,000-gallon double-wall gasoline tank; and 3) a 2,000-gallon double-wall dry interstice diesel exhaust fluid tank. The contractor will verify the required tank burial depth for all three tanks onsite so that all product and vapor slopes meet California Air Resources Board/South Coast Air Quality Management District requirements.

According to Mr. Koss, no USTs are currently located at the Site or are known to have previously been located at the Site. No obvious evidence of USTs (i.e., vent pipes, fill ports) was observed by GHD during the Site reconnaissance. The Site is not listed in the databases reviewed as having any USTs or releases therefrom.

Exterior Lighting

Parking lot lights would be installed, as needed, at various places onsite. Lighting for the project would comply with the requirements of the City's Municipal Code. Specifically, the project would be required to comply with City of Moreno Valley Municipal Code § 9.08.100, Lighting, which states, "All outdoor lighting associated with nonresidential uses shall be fully shielded and directed away from surrounding residential uses. Such lighting shall not exceed one-quarter foot-candle minimum maintained lighting measured from within five feet of any property line, and shall not blink, flash, oscillate or be of unusually high intensity or brightness…".

Landscaping

New landscaping would include drought resistant species including trees, tall shrubs, low shrubs and groundcovers. The majority of landscaping would occur along the perimeter of the project site, with a small number of trees, low shrubs, and groundcover located near the building entrance.

Perimeter Fencing and Exterior Walls

Perimeter fencing would be provided on all sides of the project site and would include:

- 14 feet high screen walls in the southern part of the site, along Frontage Road and the southern and the eastern site boundaries.

- Six feet high ornamental fence and decorative walls in the northern part of the site, along Frontage Road, Alessandro Boulevard and the eastern site boundary.

- Six feet high masonry wall in some part along the northern perimeter of the site located along Alessandro Boulevard.

To secure project site access, the project would provide black aluminum swing gates along the two driveways proposed along Frontage Road for vehicle access from Frontage Road into the project site. Another similar gate would be provided near the office building in the northern portion of the site.

Utilities

Sanitary Sewer: The project proposes offsite sewer improvements to connect the sewer lines from the project site to the existing sewer network in Alessandro Boulevard and Frontage Road. All sewer line sizes and connections are subject to review by the City. The project applicant will work with the City's Public Works Department for necessary approvals and ensure compliance with applicable requirements.

Domestic Water: New water meters would be installed as required to meet the demands calculated by the plumber for the project and in compliance with the requirements of the City's Engineering Department. Water would be provided by the Eastern Municipal Water District.

Dry Utilities: It is anticipated that natural gas supply is adequate to serve the project. Natural gas service would be provided to the project site by the Southern California Gas Company (SoCalGas). Moreno Valley Utility (MVU) would provide electricity to the project site.

Stormwater: The project proposes drainage improvements including storm drains and storm drain inlets, modular wetland systems and underground detention system consisting of plastic pipes. The detention system would outlet to a proposed pump that would pump stormwater up to an existing 24-inch storm drain onsite. The proposed storm drain improvements would limit runoff flow rates from the site at project completion to no greater than existing rates. Therefore, project

development would not require construction of new or expanded off-site stormwater drainage facilities.

Offsite Improvements

The project would include the following offsite improvements:

• The three driveways along the project boundary (two along Frontage Road and one along Alessandro Boulevard) would be constructed to service the project.

• Utility improvements will include both wet and dry; domestic and fire water, stormwater, sewer, electrical, gas, cable tv, communication, and possibly more. Most of the utility improvements would be limited to tie-in and connections to facilities under adjacent sidewalks and utility easements along Frontage Road and Alessandro Boulevard.

Construction Activities

Construction Schedule

For the purpose of environmental analysis in this Initial Study, it is anticipated that project construction would begin in February 2024 and would last approximately 15 months, ending around April 2025 (refer to **Table 5**).

Onsite Construction

Construction activities would include demolition and site clearance, grading, utility trenching and installation, building construction, paving, landscaping, architectural coating, and any associated offsite work that may be required. Once earthwork commences, all of the various phases of construction would follow in sequence.

The type of construction equipment utilized during construction is anticipated to include backhoes, excavator, skip loader, grader, water truck, concrete trucks, lifting crane, forklifts, Skiploader, compactor, concrete truck, roller, and electric boom lift.

For safety reasons, temporary barricades would be used to limit access to the site during project construction. Safe access for construction workers would be maintained throughout construction.

It is anticipated that approximately 16 to 20 workers would be onsite during the peak construction phases. Construction staging areas would be provided within the boundaries of the project site. Construction workers would park vehicles onsite and construction trucks and equipment would also be parked and stored onsite.

Table 5 - Construction Schedule and Phasing

Construction Phase	Start	End
Demolition	Feb 5, 2024	Feb 9, 2024
Rough Grading	Feb 12, 2024	March 1, 2024
Building Construction	March 1, 2024	Dec 6, 2024
Concrete and Paving Improvements	Jan 1, 2025	Jan 15, 2025
Final Grading and Landscaping	March 1, 2025	March 28, 2025
Architectural Coating	April 1, 2025	April 26, 2025

Discretionary Actions

The following discretionary actions would be required for the implementation of the proposed project.

- Plot Plan Review

Other Permits and Approvals

Following Lead Agency approval of the Initial Study, the following permits and approvals would be required prior to construction, as shown in **Table 6** below.

Table 6 - References and Approvals

Agency	Permit or Approval
City of Moreno Valley Planning Commission	Design review and approval
City of Moreno Valley Building & Safety Division	Site Plan review and approval, and Building Permits
Moreno Valley Fire Department	Building plan check and approval. Review for compliance with the 2019 California Fire Code, 2019 California Building Code, California Health & Safety Code and Moreno Valley Municipal Code. Plans for fire detection and alarm systems, and automatic sprinklers.
Eastern Municipal Water District	Letter of authorization/consent for proposed improvements to provide water supply connection to new development.
Southern California Gas Company	Letter of authorization/consent for proposed improvements to provide natural gas connection to new development.
Southern California Edison Company	Letter of authorization/consent for proposed improvements to provide electrical connection to new development.

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

Letters were sent by the City of Moreno Valley (the lead agency) to local Native American tribes asking if they wished to participate in AB 52 consultation concerning the Penske Sales, Leasing and Maintenance Project within the City. The letters were sent on April 27, 2023 by certified mail.

The City received a response from four tribes including: Agua Caliente Band of Cahuilla Indians, Rincon Band of Luiseño Indians, Pechanga Band of Mission Indians and Morongo Band of Mission Indians.

Detailed information regarding AB 52 consultation with those four Native American tribes and proposed mitigation measures is provided in the Tribal Cultural Resources Section of this Initial Study.

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

- City of Moreno Valley
- Eastern Municipal Water District
- South Coast Air Quality Management District
- Regional Water Quality Control Board
- Moreno Valley Fire Department
- Southern California Gas Company
- Southern California Edison Company

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

Appendix A	Project Plans
Appendix B	Criteria Pollutant and Greenhouse Gas Emissions Modeling
Appendix C	Biological Resources Evaluation
Appendix D	Phase I Cultural Resources Inventory & Paleontological Records Search
Appendix E	Geotechnical Study
Appendix F	Phase I Environmental Site Assessment and Phase II Limited Site Assessment
Appendix G	Traffic Impact Assessment Memorandum
Appendix H	Water Quality Management Plan and Preliminary Hydrology Report
Appendix I	Ambient Noise Measurement Data

17. **Acronyms:**

AAQS	ambient air quality standards
AB	Assembly Bill
afy	acre-feet per year
AMSL	above mean sea level
APE	area of potential effect
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ATCM	airborne toxic control measure
ATP	Active Transportation Plan
BAU	business as usual
BGS	below ground surface
BMPs	Best Management Practices
BP	Business Park
Btu	British Thermal units
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CalGreen	2016 California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CAOs	Cleanup and Abatement Orders
CAT	Climate Action Team
CBC	California Building Code
CCAA	California Clean Air Act
CEQA	California Environmental Quality Act

CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CGR	California Gas Report
CCR	California Code of Regulations
CFR	Code of Federal Regulations
CH_4	methane
CHP	California Highway Patrol
CHRIS	California Historic Resources Inventory System
City	City of Moreno Valley
CDOs	Cease and Desist Orders
CNRA	California Natural Resources Agency
CO	Carbon monoxide
CO_2	carbon dioxide
CO_{2e}	carbon dioxide equivalent
CRC	California Residential Code
dB	decibel
dBA	A-weighted decibel scale
DCAP	Draft Climate Action Plan
DIF	Development Impact Fee
DMA(s)	Drainage Management Area(s)
DOC	California Department of Conservation
DOAS	Dedicated outdoor air systems
DOSH	California Division of Safety and Health
DTSC	Department of Toxic Substances Control
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMWD	Eastern Municipal Water District
EO	Executive Order
EOP	Emergency Operations Plan
ESA	Environmental Site Assessment
FHSZ	Fire Hazard Severity Zones
FMMP	Farmland Mapping and Monitoring Program
FRAP	CAL FIRE Fire Resource and Assessment Program
FTA	Federal Transit Administration
GHG	greenhouse gas
GPCD	gallons per capita per day
gpd	Gallons per day
GWP	global warming potential
HFCs	hydrofluorocarbons
Hz	hertz
IPCC	Intergovernmental Panel on Climate Change
IS/MND	Initial Study/Mitigated Negative Declaration
LED	light-emitting diode
LCFS	Low Carbon Fuel Standard
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
L_{max}	root mean square maximum noise level
LOS	Level of Service
LRA	Local Responsibility Area
LRTS	Long Range Transportation Study
LUST	Leaking Underground Storage Tank

MLD	Most Likely Descendant
MM	mitigation measure
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
$MMTCO_{2e}$	million metric tons of CO2e
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
MVU	Moreno Valley Utility
MVRWRF	Moreno Valley Regional Water Reclamation Facility
MVWMP	Moreno Valley Wildfire Mitigation Plan
MWS	modular wetland systems
MVFD	Moreno Valley Fire Department
MVPD	Moreno Valley Police Department
MVUSD	Moreno Valley Unified School District
MVPL	Moreno Valley Public Library
MWS	modular wetland systems
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Communities Conservation Plan
ND	Negative Declaration
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NO	nitric oxide
NO_2	nitrogen dioxide
NOx	Nitrogen oxides
O_3	Ozone
OSHA	Occupational Safety and Health Administration
Pb	lead
PFCs	perfluorocarbons
PM	particulate matter
$PM_{2.5}$	fine particulate matter
PM_{10}	respirable particulate matter
PPM	parts per million
PV	photovoltaic
RCTC	Riverside County Transportation Commission
RCFD	Riverside County Fire Department
RCRA	Resource Conservation and Recovery Act
RCP	reinforced concrete pipe
REC(s)	recognized environmental condition(s)
RMS	root mean square
ROG	Reactive organic gases
ROW	right-of-way
RPS	Renewables Portfolio Standard
RTA	Riverside Transit Authority
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison

SCS	Sustainable Communities Strategy
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SLF	Sacred Lands File
SMARA	California Surface Mining and Reclamation Act
SMBMI	San Manuel Band of Mission Indians
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company
SRA	State Responsibility Area
SRAs	source receptor areas
STIP	Statewide Transportation Improvement Program
SWRCB	California State Water Resources Control Board
TAC(s)	Toxic Air Contaminant(s)
TCRs	tribal cultural resources
TMP	Traffic Management Plan
TUMF	Transportation Uniform Mitigation Fee
USGS	United States Geological Survey
USEPA	United States Environmental Protection Agency
USDOT	United States Department of Transportation
VCP	Vitrified Clay Pipe
VdB	vibration decibels
VHFHSZs	very high fire hazard severity zones
VOC	volatile organic compound
WRCOG	Western Riverside Council of Governments
°F	degrees Fahrenheit

ENVIRONMENTAL CHECKLIST

Environmental Factors Potentially Affected

The checked topics below indicate that a "Potentially Significant Impact" or a "Less than Significant Impact with Mitigation Required" is likely with project implementation. In the following pages, these impacts will be identified.

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

Determination (To Be Completed by the Lead Agency)

Based on this initial evaluation:

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

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

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

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

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

Danielle Harper-Scott

Signature

3/13/24

Date

Danielle Harper-Scott, Senior Planner

Printed Name

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must consider the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from a "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, Program EIR, or another CEQA process, an affect has been adequately analyzed in an earlier EIR or negative declaration. (See Section 15063(c)(3)(D) of the CEQA Guidelines. In this case, a brief discussion should identify the following:
   a. Earlier Analyses Used. Identify and state where the earlier analysis is available for review.
   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated. A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
   a. The significance criteria or threshold, if any, is used to evaluate each question; and
   b. The mitigation measure identified, if any, to reduce the impact to less than significant.

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

Response:

A "visual environment" includes the built environment (development patterns, buildings, parking areas, and circulation elements) and natural environment (such as hills, vegetation, rock outcroppings, drainage pathways, and soils) features. Visual quality, viewer groups and sensitivity, duration, and visual resources characterize views.

- Visual quality refers to the general aesthetic quality of a view, such as vividness, intactness, and unity.
- Viewer groups identify who is most likely to experience the view. High-sensitivity land uses include residences, schools, playgrounds, religious institutions, and passive outdoor spaces such as parks, playgrounds, and recreation areas.
- Duration of a view is the amount of time that a particular view can be seen by a specific viewer group.
- Visual resources refer to unique views, and views identified in local plans, from scenic highways, or of specific unique structures or landscape features.

Less Than Significant Impact

Scenic vistas generally include extensive panoramic views of natural features, unusual terrain, or unique urban or historic features, for which the field of view can be wide and extend into the distance, and focal views that focus on a particular object, scene or feature of interest.

The project site is located in an area of Moreno Valley characterized by flat topography and urban development. The city of Moreno Valley is located in the north end of the San Jacinto Basin, a wide region of valleys interspersed with hills and small mountain ranges. Moreno Valley is surrounded by hills and small mountain ranges in all directions: to the northwest (Box Springs Mountains); northeast (San Timoteo Badlands); southeast (Bernasconi Hills); and southwest (Gavilan Hills). Other more distant mountain ranges that are visible in the background include the San Bernardino Mountains to the north and northeast and San Jacinto Mountains to the east. The Santa Ana Mountains lie southwest of Moreno Valley but are not visible from the site due to a large industrial building just west of Old 215 Frontage Road. The proposed development of two one-story buildings—one in the north end of the site and one near the center of the site—would not substantially detract from scenic vistas. Impacts would be less than significant.

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

Response:

No Impact

The California Department of Transportation (Caltrans) designates state scenic highways. The nearest state scenic highway to the project site is State Route 213 (SR-213), approximately 23 miles to the southeast (Caltrans, 2022; see **Figure 6**). SR-213 is not visible from the project site. No scenic resources are present onsite. A few small trees are present along the south site property line. However, in photos dated January 2022, the trees appear to be in poor condition and are not considered scenic resources.

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

Project development would have no impact on scenic resources, including such resources in a state scenic highway.

Figure 6 - State Scenic Highways and National Byways

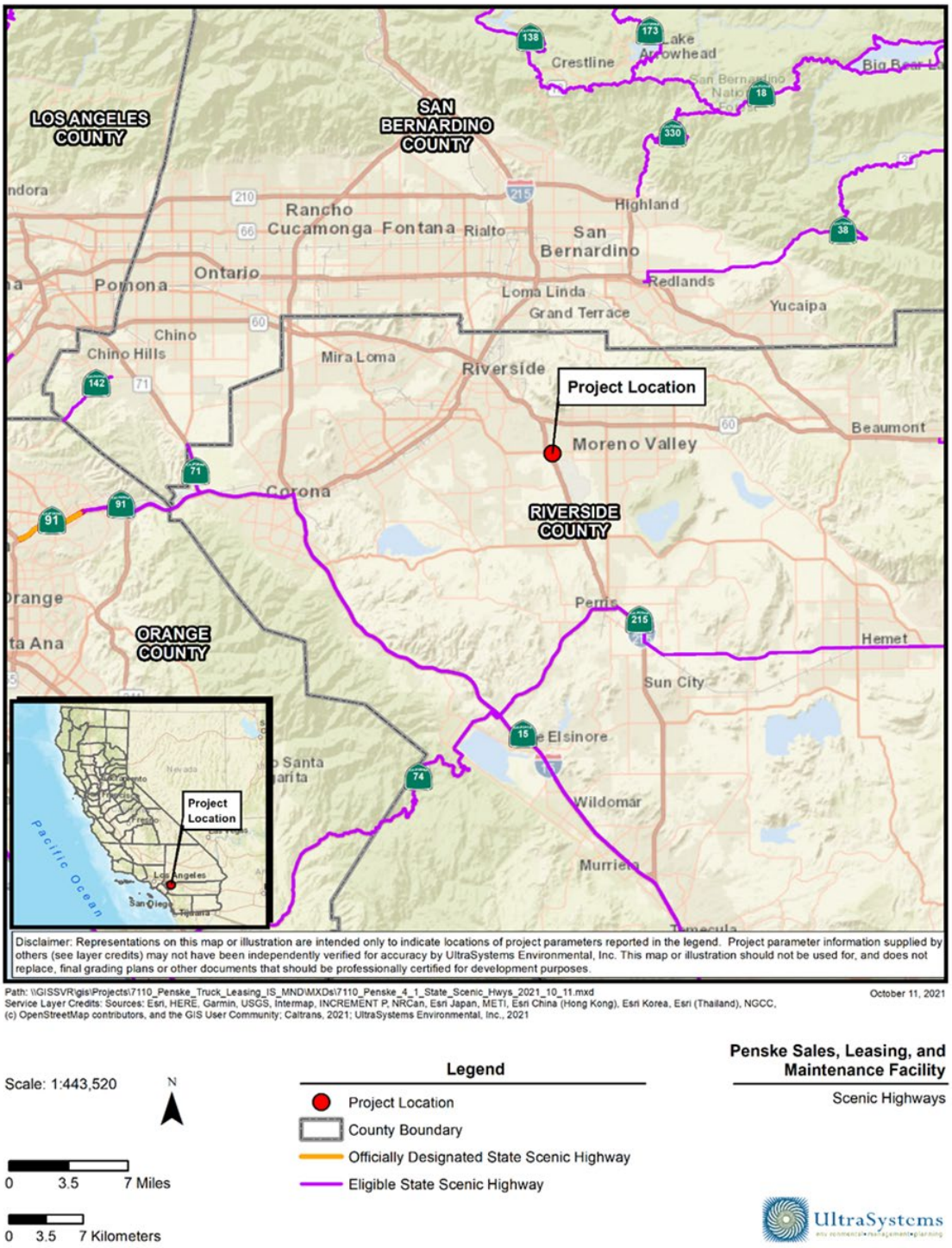


Figure 7 - Existing Visual Character in the Vicinity of the Project Site

PHOTO 1: View looking north across the project site showing truck trailers with Box Springs Mountains in background

PHOTO 3: View looking southwest across the project site showing industrial uses offsite

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

PHOTO 2: View looking south across the project site showing truck trailers; the building in the background is industrial use offsite.

PHOTO 4: View looking east across the project site showing truck trailers on the left and industrial uses offsite in the background

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

Response:

Less than Significant Impact

The project site is in an urban setting surrounded by commercial and industrial land uses. The project site is zoned Business Park (BP); the Business Park zoning district does not set forth requirements governing scenic quality. The project site is vacant land used for parking or storage of truck trailers; **Figure 7** shows the site in its current state. Project development would have a slight favorable impact on the area's appearance, and would not have an adverse impact on scenic quality or conflict with applicable zoning and other regulations governing scenic quality.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Response:

Less Than Significant Impact

Nighttime Lighting

The project site is located in an urban area characterized by medium nighttime ambient light levels. Street lights, traffic on local streets and exterior lighting and parking lot lighting in surrounding developments are the primary sources of ambient light near the project site. No light-sensitive uses are near the project site.

The project proposes parking lot lighting throughout the site, exterior and interior building lights, and lighting on the underside of the proposed fuel island canopy. In addition, project operation would include use of vehicle lights onsite. The new project lighting would be visible from the surrounding area. Therefore, the project's proposed exterior lighting would contribute to ambient nighttime lighting near the project site.

Proposed exterior building lights and parking lot lights would comply with the following requirements set forth in City of Moreno Valley Municipal Code § 9.08.100, Lighting:

Nonresidential Uses.

a. All outdoor lighting associated with nonresidential uses shall be fully shielded and directed away from surrounding residential uses. Such lighting shall not exceed one-quarter foot-candle minimum maintained lighting measured from within five feet of any property line, and shall not blink, flash, oscillate or be of unusually high intensity or brightness.

b. All lighting installations shall be designed and installed with full cutoff and be fully shielded to reduce glare and light trespass.

c. The maximum wattage for nonresidential uses shall be two hundred fifty (250) watts or equivalent light intensity of high intensity discharge (HID) lighting.

Off-Street Parking.

a. All parking lots or structures providing more than five spaces for use by the general public and their pedestrian links shall be provided with a minimum coverage of one foot-candle of light with a maximum of eight foot-candles on the parking or walkway surface, unless otherwise approved, for visibility and security. Such lighting shall not exceed one-quarter foot-candle minimum maintained lighting measured from within five feet of any property line, and shall not blink, flash, oscillate or be of unusually high intensity or brightness. All wiring shall be underground.

b. All lighting installations shall be designed and installed with full cutoff and be fully shielded to reduce glare and light trespass.

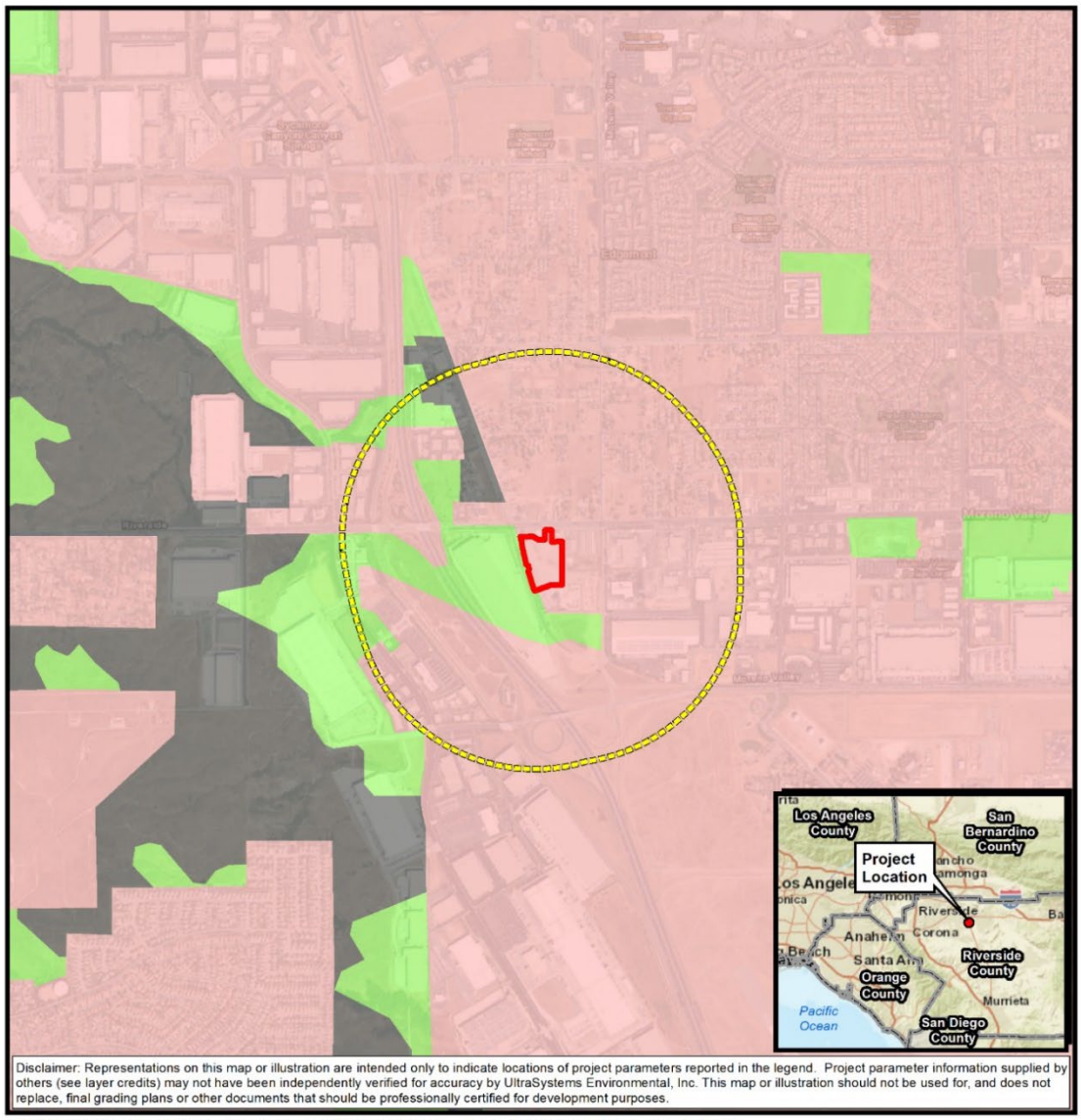
c. The maximum wattage for parking lot lighting shall be two hundred fifty (250) watts or equivalent light intensity of high intensity discharge (HID) lighting.

Project construction would be limited to the hours specified by the City of Moreno Valley Municipal Code § 11.08.030, that is, 7 a.m. to 8 p.m. Therefore, construction would not be conducted during the most light-sensitive hours of the night. Project construction would not generate light adversely affecting nighttime views in the area. Impacts would be less than significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Glare (Daytime and Nighttime) The two proposed buildings would be built of low-glare materials and project development would not add substantial glare to the project site or surroundings. Glare impacts on daytime and nighttime views would be less than significant.				
II. AGRICULTURE AND FOREST RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resources Board. **Would the project:**				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
Response: **No Impact** The Farmland Mapping and Monitoring Program of the California Resources Agency (FMMP) was established in 1982 by the California Department of Conservation (DOC) in order to identify critical agricultural farmlands and track if and how the lands are converted to other uses. The proposed project is mapped as "Urban and Built-up Land," which means it is land that has a building density of at least one building to 1.5 acres of land and is primarily used for residential, industrial, commercial, construction, or other non-agricultural business (DOC, 2021). Refer to Figure 8. Therefore, project development would not convert farmland for non-agricultural use. No impacts would occur.				

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

Figure 8 - Important Farmland



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

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Response: **No Impact** The Williamson Act allows local governments to work with private landowners by negotiating an agreement to tax these landowners at lower rates if they restrict specific pieces of land to agricultural or open space use. According to the 2016 Riverside County Williamson Act Contract Land Map, the project site is identified as "Urban and Built-Up Land" and does not contain land enrolled in a Williamson Act contract (DOC, 2021). Under the City of Moreno Valley General Plan, the project site and surrounding areas are designated for Business Park/Light Industrial and Commercial uses. Therefore, the project would not conflict with existing zoning for agriculture uses or any Williamson Act contracts. No impacts would occur.				
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
Response: **No Impact** The project site is zoned BP (Business Park), and is not zoned as forest land, timberland, or timberland production. Therefore, proposed project would not conflict with zoning for forest land or timberland, and no impact would occur.				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
Response: **No Impact** The project site is not zoned for forest land, timberland, timberland production or cultivated for forest resources. Therefore, the project would not cause the loss of forest land or conversion of forest land to non-forest use, and no impact would occur.				
e) Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
Response: **No Impact** The project site and surrounding properties are not currently used for agriculture and are built out with urban land uses. Development on the project site would not result in changes to the environment, which could cause the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use; therefore, no impacts would occur.				
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
Response:				

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

Pollutants of Concern

Criteria pollutants are air pollutants for which acceptable levels of exposure can be determined and an ambient air quality standard has been established by the U.S. Environmental Protection Agency (USEPA) and/or the California Air Resources Board (ARB). The criteria air pollutants of concern are nitrogen dioxide (NO_2), carbon monoxide (CO), particulate matter (PM_{10} and $PM_{2.5}$), sulfur dioxide (SO_2), lead (Pb), and ozone (O_3), and their precursors. Since the proposed project would not generate appreciable SO_2 or Pb emissions,[1] it is not necessary for the analysis to include those two pollutants. The project is in the Riverside County portion of the South Coast Air Basin (SCAB), for whose air pollution control South Coast Air Quality Management District (SCAQMD) is substantially responsible **Table 7** shows the area designation status of the SCAB for each criteria pollutant for both the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). Presented below is a description of the air pollutants of concern and their known health effects.

Table 7 - Federal And State Attainment Status

Pollutants	Federal Classification	State Classification
Ozone (O_3)	Nonattainment (Extreme)	Nonattainment
Particulate Matter (PM_{10})	Maintenance (Serious)	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	Nonattainment (Serious)	Nonattainment
Carbon Monoxide (CO)	Maintenance (Serious)	Attainment
Nitrogen Dioxide (NO_2)	Maintenance (Primary)	Attainment
Sulfur Dioxide (SO_2)	Unclassified/Attainment	Attainment
Sulfates	No Federal Standards	Attainment
Lead (Pb)	Unclassified/Attainment	Attainment
Hydrogen Sulfide (H_2S)	No Federal Standards	Unclassified
Visibility Reducing Particles		

Sources: ARB, 2022, USEPA, 2022

Nitrogen oxides (NO_X) serve as integral participants in the process of photochemical smog production and are precursors for certain particulate compounds that are formed in the atmosphere and for ozone. A precursor is a directly emitted air contaminant that, when released into the atmosphere, forms, causes to be formed, or contributes to the formation of a secondary air contaminant for which an ambient air quality standard (AAQS) has been adopted, or whose presence in the atmosphere will contribute to the violation of one or more AAQSs. When NO_X and volatile organic compounds (VOC) are released in the atmosphere, they can chemically react with one another in the presence of sunlight to form ozone. The two major forms of NO_X are nitric oxide (NO) and NO_2. NO is a colorless, odorless gas formed from

1 Sulfur dioxide emissions will be below 0.06 pound per day during construction and below 0.02 pound per day during operation.

atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. NO_2 is a reddish-brown pungent gas formed by the combination of NO and oxygen. NO_2 acts as an acute respiratory irritant and eye irritant and increases susceptibility to respiratory pathogens.

Carbon monoxide (CO) is a colorless, odorless non-reactive pollutant produced by incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as the project location, automobile exhaust accounts for most CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions: primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February. The highest levels of CO typically occur during the colder months of the year when inversion conditions are more frequent. In terms of health, CO competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can be dizziness, fatigue, and impairment of central nervous system functions.

Particulate matter (PM) consists of finely divided solids or liquids, such as soot, dust, aerosols, fumes and mists. Primary PM is emitted directly into the atmosphere from activities such as agricultural operations, industrial processes, construction and demolition activities, and entrainment of road dust into the air. Secondary PM is formed in the atmosphere from predominantly gaseous combustion by-product precursors, such as sulfur oxides, NO_X, and VOCs.

Particle size is a critical characteristic of PM that primarily determines the location of PM deposition along the respiratory system (and associated health effects) as well as the degradation of visibility through light scattering. In the United States, federal and state agencies have focused on two types of PM. PM_{10} corresponds to the fraction of PM no greater than 10 micrometers in aerodynamic diameter and is commonly called respirable particulate matter, while $PM_{2.5}$ refers to the subset of PM_{10} of aerodynamic diameter smaller than 2.5 micrometers, which is commonly called fine particulate matter.

PM_{10} and $PM_{2.5}$ deposition in the lungs results in irritation that triggers a range of inflammation responses, such as mucus secretion and bronchoconstriction, and exacerbates pulmonary dysfunctions, such as asthma, emphysema, and chronic bronchitis. Sufficiently small particles may penetrate the bloodstream and impact functions such as blood coagulation, cardiac autonomic control, and mobilization of inflammatory cells from the bone marrow. Individuals susceptible to higher health risks from exposure to PM_{10} airborne pollution include children, the elderly, smokers, and people of all ages with low pulmonary/cardiovascular function. For these individuals, adverse health effects of PM_{10} pollution include coughing, wheezing, shortness of breath, phlegm, bronchitis, and aggravation of lung or heart disease, leading for example to increased risks of hospitalization and mortality from asthma attacks and heart attacks.

Reactive organic gases (ROG) are defined as any compound of carbon, excluding CO, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions. It should be noted that there are no state or national ambient air quality standards for ROG because ROGs are not classified as criteria pollutants. They are regulated, however, because a reduction in ROG emissions reduces certain chemical reactions that contribute to the formation of ozone. ROGs are also transformed into organic aerosols in the atmosphere, which contribute to higher PM_{10} and lower visibility. The term "ROG" is used by the ARB for this air quality analysis and is defined the same as the federal term "VOC".

Ozone is a secondary pollutant produced through a series of photochemical reactions involving ROG and NO_x. Ozone creation requires ROG and NO_x to be available for approximately three hours in a stable atmosphere with strong sunlight. Because of the long reaction time, peak ozone concentrations frequently occur downwind of the sites where the precursor pollutants are emitted. Thus, ozone is considered a regional, rather than a local, pollutant. The health effects of ozone include eye and

respiratory irritation, reduction of resistance to lung infection and possible aggravation of pulmonary conditions in persons with lung disease. O_3 is also damaging to vegetation and untreated rubber.

Climate/Meteorology

The project site will be located wholly within the SCAB, which includes all of Orange County, as well as the non-desert portions of Los Angeles, Riverside and San Bernardino Counties. The distinctive climate of the SCAB is determined by its terrain and geographical location. The SCAB is in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter. The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. Thus, the climate is mild, tempered by cool sea breezes. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds.

The average high and low temperatures as recorded at the Riverside Fire Station 3, California meteorological station (#047470; latitude 33.95°, longitude -117.388°) (WRCC, 2016), which is approximately 6.5 miles west of the project site, are 79.5°F and 48.6°F, respectively. Average winter (December, January, and February) high and low temperatures are approximately 67.6°F and 39.8°F and average summer (June, July, and August) high and low temperatures are approximately 91.9°F and 58°F. The annual average of total precipitation is approximately 10.21 inches, which occurs mostly during the winter and relatively infrequently during the summer. Monthly precipitation averages approximately 1.9 inches during the winter (December, January, and February), approximately 0.9 inches during the spring (March, April, and May), approximately 0.5 inch during the fall (September, October, and November), and approximately 0.1 inch during the summer (June, July, and August).

Local Air Quality

Table 7 shows the area designation status of the SCAB for each criteria pollutant for both the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS).

The South Coast Air Quality Management District (SCAQMD) has divided the SCAB into source receptor areas (SRAs), based on similar meteorological and topographical features. The proposed project site is in SCAQMD's Moreno Valley (SRA 24), which is served by the Perris Monitoring Station, located 9.4 miles south of the proposed project site, at 237 1/2 North D Street., Perris, Riverside. This station monitored ozone and PM_{10} in 2020 and 2021. In 2022, the nearest station that monitored PM_{10}, along with $PM_{2.5}$ and NO_2 from 2020 to 2022 is the Riverside- Rubidoux Monitoring Station, it located about 9.5 miles northeast of the project site, at 5888 Mission Boulevard, Riverside. The ambient air quality data in the proposed project vicinity as recorded at the Perris Monitoring Station and the Riverside- Rubidoux Monitoring Station from 2020 to 2022 with the applicable federal and state standards are shown in **Table 8**.

Table 8 - Ambient Air Quality Monitoring Data

Air Pollutant	Standard/Exceedance	2020	2021	2022
Ozone (O_3) - Perris	Max. 1-hour Concentration (ppm)	0.125	0.117	0.122
	Max. 8-hour Concentration (ppm)	0.106	0.094	0.095
	# Days > Federal 8-hour Std. of 0.070 ppm	74	55	70
	# Days > California 1-hour Std. of 0.070 ppm	34	25	30
	# Days > California 8-hour Std. of 0.070 ppm	77	60	72

Nitrogen Dioxide (NO_2) - Riverside-Rubidoux	Max. 1-hour Concentration (ppm)	0.06	0.06	0.06
	Annual Average (ppm)	0.014	0.014	0.013
	# Days > California 1-hour Std. of 0.070 ppm	0	0	0
Respirable Particulate Matter (PM_{10}) - Riverside-Rubidoux	Federal Max. 24-hour Concentration (µg/m^3)	92.3	77.5	153.6
	State Max. 24-hour Concentration (µg/m^3)	87.6	73.5	61.9
	#Days > Fed. 24-hour Std. of 35 µg/m^3	ND	ND	0
	Federal Annual Average (µg/m^3)	33.4	30.4	37.5
	State Annual Average (µg/m^3)	ND	ND	30.0
Fine Particulate Matter ($PM_{2.5}$) - Riverside-Rubidoux	Federal Max. 24-hour Concentration (µg/m^3)	59.9	82.1	38.5
	State Max. 24-hour Concentration (µg/m^3)	61.9	82.1	38.5
	#Days > Fed. 24-hour Std. of 35 µg/m^3	12	11	1
	Federal Annual Average (µg/m^3)	13.3	12.7	10.8
	State Annual Average (µg/m^3)	14.1	13.2	10.8

Source: ARB, 2022.

ND – There was insufficient (or no) data available to determine the value.

Air Quality Management Plan (AQMP)

The SCAQMD is required to produce plans to show how air quality will be improved in the region. The California Clean Air Act (CCAA) requires that these plans be updated triennially to incorporate the most recent available technical information.[2] A multi-level partnership of governmental agencies at the federal, state, regional, and local levels implement the programs contained in these plans. Agencies involved include the USEPA, ARB, local governments, Southern California Association of Governments (SCAG), and SCAQMD. The SCAQMD and the SCAG are responsible for formulating and implementing the Air Quality Management Plan (AQMP) for the SCAB. The SCAQMD updates its AQMP every three years.

The 2022 AQMP (SCAQMD, 2022) was adopted by the SCAQMD Board on December 2, 2022. It focuses on reducing ozone by limiting the emissions of nitrogen oxides (NO_x) which is a key reactant in ozone formation. The NO_x reductions are through extensive use of zero emission technologies across all stationary and mobile sources categories. The majority of NO_x emissions are from heavy-duty trucks, ships and other state and federally regulated mobile sources that are mostly beyond the SCAQMD's control. The SCAQMD's primary authority is over stationary sources, which account for approximately 20 percent of the SCAB's NO_x emissions.

The AQMP incorporates updated emission inventory methodologies for various source categories and incorporates the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

2 CCAA of 1988.

(RTP/SCS) prepared by SCAG (2020). The 2020-2045 RTP/SCS was determined to conform to the federally mandated State Implementation Plan for the attainment and maintenance of the NAAQS. county and city general plans.

Sensitive Receptors

Some people, such as individuals with respiratory illnesses or impaired lung function because of other illnesses, persons over 65 years of age, and children under 14, are particularly sensitive to certain pollutants. Facilities and structures where these sensitive people live or spend considerable amounts of time are known as sensitive receptors. For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. Commercial and industrial facilities are not included in the definition of sensitive receptor, because employees typically are present for shorter periods of time, such as eight hours. Therefore, applying a 24-hour standard for PM_{10} is appropriate not only because the averaging period for the state standard is 24 hours, but because the sensitive receptor would be present at the location for the full 24 hours.

The nearest sensitive receptors to the proposed project site, with the highest potential to be impacted by the proposed project, are single-family residences. The closest residence is at 21872 Alessandro Boulevard, 220 feet away from the northern boundary of the site.

Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact

The SCAQMD has an AQMP that proposes policies and measures to achieve federal and state standards for healthful air quality in the SCAB. The AQMP incorporates land use assumptions from local general plans and regional growth projections developed by the SCAG to estimate stationary and mobile air emissions associated with projected population and planned land uses. If the proposed land use is consistent with the local general plan, then the impact of the project is presumed to have been accounted for in the AQMP. This is because the land use and transportation control sections of the AQMP are based on the SCAG regional growth forecasts, which incorporated projections from local general plans. The City's General Plan land use designation for the project site is Industrial/Business Park, which allows manufacturing, research and development, warehousing and distribution, as well as office and support commercial activities, with a floor area ratio not exceeding 1.0 (City of Moreno Valley, 2021) and the zoning district for the proposed site is BP (Business Park), which allows light industrial, research and development, office-based firms and limited supportive commercial uses (City of Moreno Valley Municipal Code Section 9.05.020; City of Moreno Valley, 2021). Thus, the proposed project is consistent with the allowable land use type and meets the main objectives of the land use plans and ordinances governing the project site.

Another measurement tool in determining consistency with the AQMP is to determine whether a project would generate population and employment growth and, if so, whether that growth would exceed the growth rates forecasted in the AQMP and how the project would accommodate the expected increase in population or employment. The project does not propose residential development and would not directly induce substantial growth in Moreno Valley. It would not indirectly induce growth since no new public infrastructure is proposed or would be required. Therefore, the project would not directly or indirectly induce growth in Moreno Valley and would not violate the assumptions of the AQMP.

In light of the foregoing, the project would not conflict with or obstruct implementation of the applicable air quality plan, and there would be a less than significant impact.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an	☐	☐	☒	☐

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
applicable federal or state ambient air quality standard?				

Response:

Less than Significant Impact

Project Emissions

A project may have a significant impact if project-related emissions would exceed federal, state, or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or projected air quality violation. To address potential impacts from construction and operational activities, the SCAQMD currently recommends that impacts from projects with mass daily emissions that exceed any of the thresholds outlined in **Table 9** be considered significant. The City defers to these thresholds for the evaluation of construction and operational air quality impacts.

Table 9 - SCAQMD Thresholds Of Significance

Pollutant	Mass Daily Thresholds (Pounds/Day)	
	Construction	Operation
Nitrogen Oxides (NOx)	100	55
Volatile Organic Compounds (VOC)	75	55
Respirable Particulate Matter (PM10)	150	150
Fine Particulate Matter (PM2.5)	55	55
Sulfur Oxides (SOX)	150	150
Carbon Monoxide (CO)	550	550
Lead	3	3

Source: SCAQMD, 2019

Regional Construction Emissions

Project components are described in **Project Description**. Construction activities for the proposed project are anticipated to last up to 11 months. It is anticipated that construction at the project site would begin in early July 2023 and end in late April 2024. While it is possible that the construction of the project may take longer, this schedule would be conservative and yields the maximum daily impacts. There would be six construction phases:

- Demolition.
- Rough Grading.
- Building Construction.
- Concrete and Paving Improvements.
- Final Grading and Landscaping.
- Architectural Coating.

There would be no overlap of construction activities among any of the phases. **Table 10** shows the project schedule used for the air quality, greenhouse gas emissions, and noise analyses.

Table 10 - Assumed Construction Schedule

Construction Phase	Start	End

Demolition.	February 5, 2024	February 9, 2024
Rough Grading.	February 12, 2024	March 1, 2024
Building Construction.	March 1, 2024	December 6, 2024
Concrete and Paving Improvements.	January 1, 2025	January 15, 2025
Final Grading and Landscaping.	March 1, 2025	March 28, 2025
Architectural Coating.	April 1, 2025	April 26, 2025

These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the project site) would primarily generate NO_X emissions. The amounts of emissions generated daily would vary, depending on the amount and types of construction activities occurring at the same time.

Estimated criteria pollutant emissions from the project's onsite and offsite project construction activities were calculated using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.20. CalEEMod (CAPCOA, 2023) is a planning tool for estimating emissions related to land use projects. Model-predicted project emissions are compared with applicable thresholds to assess regional air quality impacts.

CalEEMod defaults were used for off-road construction equipment and on-road construction trips and direct and indirect operational emissions.

As shown in **Table 11**, construction emissions would not exceed SCAQMD regional thresholds. Therefore, the project's short-term regional air quality impacts would be less than significant. Refer to Appendix A of this document for air quality calculations.

Table 11 - Maximum Daily Regional Construction Emissions

Construction Activity	**Maximum Emissions (pounds/day)**				
	ROG	**NO_x**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Maximum Emissions, 2024	4.00	32.4	41.5	10.6	5.21
Maximum Emissions, 2025	11.3	16.3	18.6	7.94	4.12
SCAQMD Significance Thresholds	*75*	*100*	*550*	*150*	*55*
Significant? (Yes or No)	**No**	**No**	**No**	**No**	**No**

Source: Calculated by UltraSystems with CalEEMod (Version 2022.1.1.20).

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

Regional Operational Emissions

The project is a motor vehicle and truck leasing, rental and sales business that includes the storage, maintenance and repair of motor trucks and trailers; outside parking and storage of vehicles; a motor vehicle repair shop; and the storage and dispensing of fuel for internal customers only. Operational emissions generated by area sources, motor vehicles and energy demand would result from normal day-to-day activities of the project. CalEEMod 2022.1.1.20 was used to estimate these emissions.

The results of these calculations are presented in **Table 12**. As seen in the table, for each criteria pollutant, operational emissions would be below the pollutant's SCAQMD significance threshold. Therefore, operational criteria pollutant emissions would be less than significant**.**

Table 12 - Maximum Daily Project Operational Emissions

Emission Source	**Pollutant (pounds/day)**				
	ROG	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Area Source Emissions	0.82	0.01	1.11	< 0.005	< 0.005
Energy Source Emissions	0.02	0.29	0.25	0.02	0.02
Mobile Source Emissions	13.9	9.29	75.3	13.4	3.48
Total Operational Emissions	14.74	9.59	76.66	13.42	3.5
SCAQMD Significance Thresholds	*55*	*55*	*550*	*150*	*55*
Significant? (Yes or No)	**No**	**No**	**No**	**No**	**No**

Source: Calculated by UltraSystems with CalEEMod (Version 2022.1.1.20).

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

Response:

Less Than Significant Impact

Construction

Construction of the proposed project would generate short-term and intermittent emissions. Following SCAQMD guidance (Chico and Koizumi, 2008), only onsite construction emissions were considered in the localized significance analysis. A single-family housing located approximately 220 feet (67 meters) northeast of the project site is the nearest sensitive receptor.[3] Localized significance thresholds for projects in SRA 24 were obtained from tables in Appendix C of the SCAQMD's *Final Localized*

[3] This is not the same distance as used for the noise impact analysis; see **Section 4.13**.

Significance Threshold Methodology (Chico and Koizumi, 2008). **Table 13** shows the results of the localized significance analysis for the proposed project.
Localized short-term air quality impacts from construction of the proposed project would be less than significant**.**

Table 13 - Results Of Localized Significance Analysis

Nearest Sensitive Receptor	**Maximum Onsite Emissions (pounds/day)**			
	NO_x	**CO**	**PM_{10}**	**$PM_{2.5}$**
Maximum daily emissions	21.5	19.6	4.0	2.3
SCAQMD LST for 5 acres @ 67 meters	***327.8***	***2606.1***	***46.5***	***12***
Significant (Yes or No)	**No**	**No**	**No**	**No**

Toxic Air Contaminants (TACs)
Since the project would include maintenance and repair of trucks and motor vehicles, and the dispensing of fuel for internal customers only, the project would potentially involve the use, storage, or processing of carcinogenic and/or noncarcinogenic TACs.

The service and repair facilities of the project would be subject to an ARB-adopted airborne toxic control measure (ATCM) that reduces chlorinated compound emissions from consumer products used in automotive maintenance and repair activities (ARB, 2001). The ATCM prohibits the use of perchloroethylene, methylene chloride, and trichloroethylene in brake cleaners, carburetor or fuel-injection air intake cleaners, engine degreasers, and general-purpose degreasers sold, supplied, offered for sale, or manufactured for use in California.

During construction activities, diesel equipment will be operating and diesel particulate matter is known to the State as a TAC. However, the risks associated with exposure to substances with carcinogenic effects are typically evaluated based on a lifetime of chronic exposure, which is defined as 24 hours per day, 7 days per week, 365 days per year, for 70 years. The short-term nature of project construction supports a finding that exposure to diesel exhaust emissions during construction would not be significant. In addition, construction activities associated with the project would be typical of other development projects in the city and would be subject to the regulations and laws relating to toxic air pollutants at the regional, state, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

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

Response:

<u>Less than Significant Impact</u>
A project-related significant adverse effect could occur if construction or operation of the proposed project would result in generation of odors that would be perceptible in adjacent sensitive areas. According to the SCAQMD *CEQA Air Quality Handbook* (SCAQMD 1993), land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project involves the construction and operation of a maintenance, repair, and limited quantity fueling facility, which would not typically be associated with odor complaints. Potential odor sources during construction activities would be equipment that emits diesel combustion exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the project. The project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. As the project involves no operational elements related to industrial

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
projects, no long-term operational objectionable odors are anticipated. Therefore, potential impacts associated with objectionable odors would be less than significant.				
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐

Response:

Less Than Significant

Plant and wildlife species protected by federal agencies, state agencies, and nonprofit resource organizations, such as the California Native Plant Society (CNPS), are collectively referred to as "special-status species". Some of these plant and wildlife species are afforded special legal or management protection because they are limited in population size, and typically have a limited geographic range and/or habitat.

Plant and wildlife species listed under the federal Endangered Species Act (ESA) or under the California Endangered Species Act (CESA) are referred to collectively as "listed species" in this section. Plant and wildlife species not listed under ESA or CESA but still protected by federal agencies, state agencies, local or regional plans such as the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), and/or nonprofit resource organizations, such as the California Native Plant Society (CNPS), are collectively referred to as "sensitive species" in this section. The term "special-status species" is used when collectively referring to both listed and sensitive species.

Special-Status Plants

Each special-status plant species was assessed for its potential to occur within the BSA by comparing its habitat elevation range and distribution (if known) with the location and elevation range of the BSA. A species was determined as having "no potential to occur" within the BSA if the BSA is outside the species' known distribution and/or the species' known elevation range.

Based on a literature review and query from publicly available databases (hereafter, plant inventory; USFWS 2022, a, b, CNDDB 2022a) for reported occurrences within a 10-mile radius of the project site, there were seven listed and 13 sensitive plant species identified by one of the following means: reported in the plant inventory, recognized as occurring based on previous surveys or knowledge of the area, or observed during the habitat assessment survey or other surveys.

Of those 20 species, two have been recorded within two miles of the BSA (see **Figure 9**). The project site lacks suitable habitat, or is outside the elevation or geographic range of all but one special-status plant species, Santa Ana River woollystar (*Eriastrum densifolium* ssp. *sanctorum*) documented in the plant inventory; Santa Ana River woollystar has a low potential to occur on the project site but was not observed during the surveys (for details, see **Appendix C1,** *Biological Resources Evaluation Report*).

No special-status plant species were observed during the surveys, including Santa Ana River woollystar. Because no special-status plant species were observed, it is anticipated that construction of the project will have less than a significant impact on special-status plant species within the BSA.

Wildlife Species

The literature review found 66 wildlife species recorded within 10 miles of the project site. Fifteen of these wildlife species are federal or state listed endangered, threatened, or candidate species under the ESA and/or the CESA, and are referred to as listed species.

Thirty-eight of the special-status wildlife species have no designated status under the ESA and/or the CESA, but are designated as sensitive or locally important by federal agencies, state agencies, local

agencies such as the RCA, and nonprofit resource organizations. These wildlife species are referred to as "sensitive" in this BRE. Of the original 66 recorded species in the wildlife inventory, 15 wildlife species have the potential to occur within two miles of the BSA (see **Figure 10**).

Each special-status wildlife species was assessed for its potential to occur within the BSA by comparing its habitat elevation range and distribution (if known) with the location and elevation range of the BSA. A species was determined as having "no potential to occur" within the BSA if the BSA is outside the species' known distribution and/or the species' known elevation range. Through this analysis, 45 of the 66 special-status wildlife species were determined to have no potential to occur within the BSA and were eliminated from further evaluation; these species are provided in the Special-Status Species Occurrence Potential Determination tables presented in **Appendix C1** of this document. It is anticipated that the project would have no impacts to these species and these species are not further discussed in this analysis. The potential to occur analysis of special-status wildlife species with at least a low potential to occur in the BSA can also be found in **Appendix C1,** *Biological Resources Evaluation Report*.

The species below was determined to have a moderate potential to occur in the project site; however, this species was not observed during the surveys:

- monarch butterfly (*Danaus plexippus*) federal candidate for listing: California overwintering population, CNDDB Special Animals List

This butterfly was determined to have a moderate potential to occur on the project site, but was not observed during the surveys and does not appear to reside permanently within the BSA. Likewise, species with a low potential to occur, as described in **Appendix C1,** *Biological Resources Evaluation Report*, were not observed during the surveys.

One MSHCP special-status species, California horned lark (*Eremophila alpestris actia*; WRCMSHCP: Covered), was observed on the project site during the September 21, 2021 survey. However, the individual only landed briefly and did not exhibit nesting or foraging behavior; this occurrence was determined to be a result of passage. California horned lark is on the MSHCP list of Covered Species Adequately Conserved.

The project site contains vernal pools in which aquatic invertebrates were observed during an October 14, 2021 survey (see **Section 4.4[c]**), therefore, protocol fairy shrimp surveys were conducted to maintain compliance with the USFWS and MSHCP. Three listed and two sensitive fairy shrimp species have a potential to occur within the region; however, the protocol fairy shrimp surveys identified only one species throughout the project site: versatile fairy shrimp (*Branchinecta lindahli*) was observed during the protocol 2021/2022 wet season and dry season surveys (see **Appendices C2**, *2021/2022 Wet Season Presence/Absence Survey for Vernal Pool Branchiopods*, and **C3**, *2022 Dry Season Survey Report for List Large Branchiopods*). The versatile fairy shrimp is not a special-status species, nor is it a Covered Species under the MSHCP.

The BSA is surrounded by urbanized areas which limit the availability of foraging habitat for special-status species within the BSA. Another factor that reduces the likelihood that special-status wildlife would establish in the BSA is that there is a high level of traffic and traffic noise which may make the habitat less desirable for many special-status species to occupy. Thus, it is anticipated that construction of the project would have less than a significant impact on special-status wildlife.

Figure 9 - CNDDB Known Occurrences Plant Species and Habitats

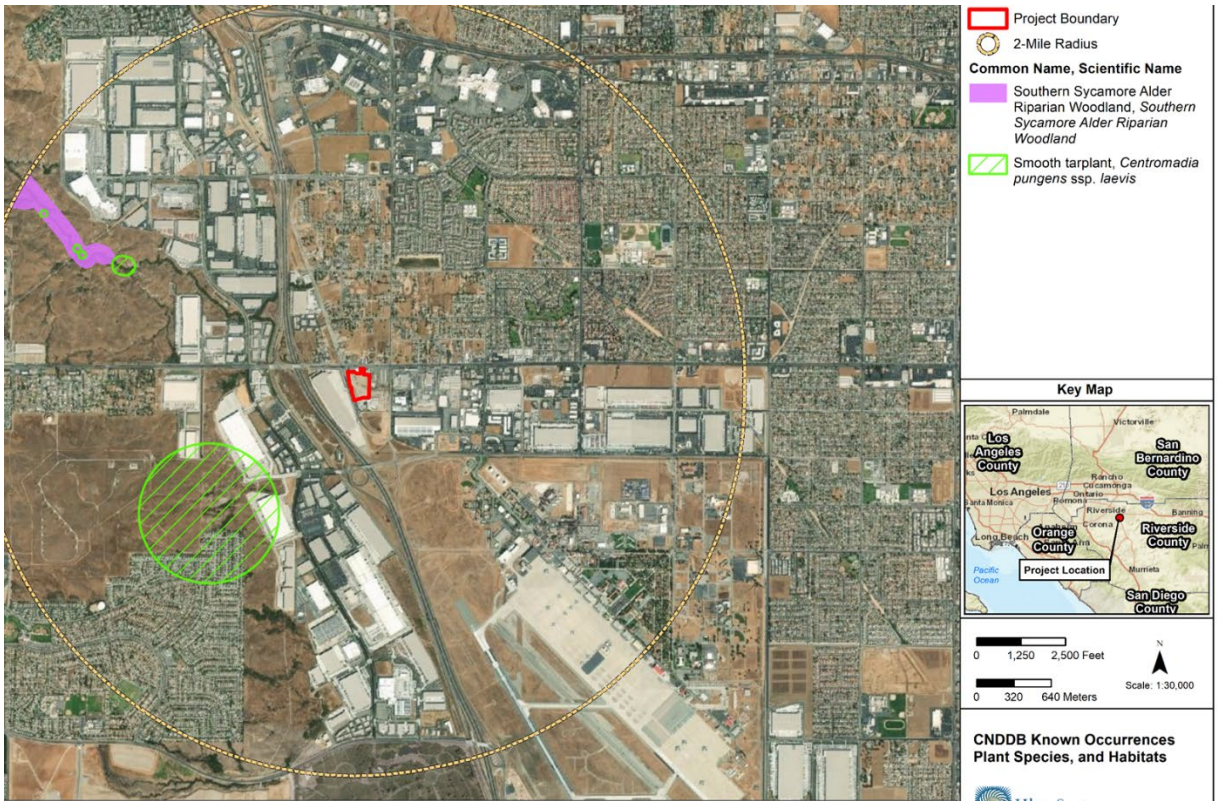
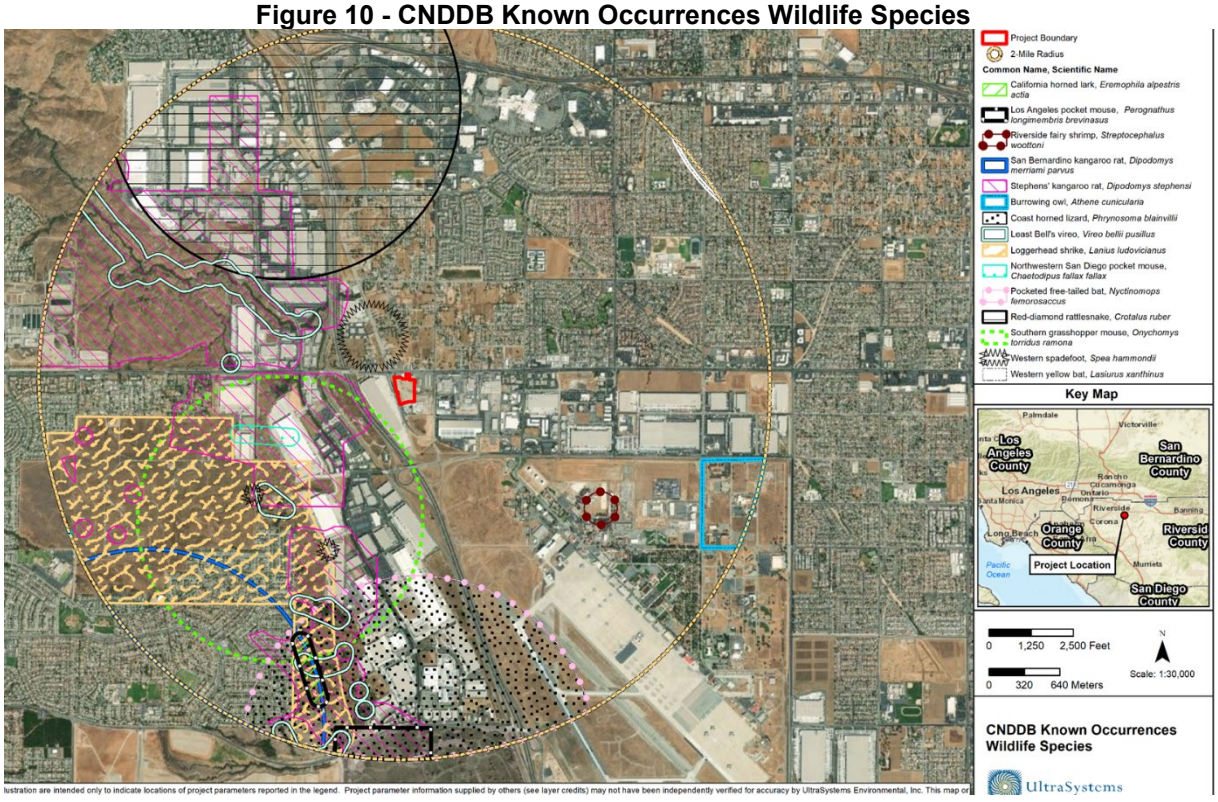


Figure 10 - CNDDB Known Occurrences Wildlife Species



lustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or

Burrowing Owl Habitat Assessment Survey Results and Discussion

The BUOW is a small ground-inhabiting owl that is found throughout the southern United States. Typical BUOW habitat is open, dry, flat ground or low rolling hills with sparse vegetation, containing available burrows. In general, BUOW prefer to occupy open habitat with sparse tree and shrub cover because the sparse vegetative cover improves their ability to spot and hunt prey. Nest and roost burrows of the BUOW in California are most commonly dug by California ground squirrels (*Spermophilus beecheyi*), but may

also be created by other mammals. Burrow openings are typically at least four inches in diameter. BUOW can also utilize artificial structures such as debris piles from which to hunt and to use as nest sites.

An area east of the BSA falls within an MSHCP BUOW survey area and, therefore, a habitat assessment for BUOW was conducted on the project site. As part of a reconnaissance level survey and habitat assessment, the potential for BUOW to occur on the project site was evaluated. Although the disturbed project site contains primarily non-native grassland, it was determined that the habitat within the BSA is not suitable for BUOW and there is no potential for BUOW to occur for the following three reasons: 1) No fossorial species were observed on the project site, thus making it unlikely that BUOW would establish on the project site; 2) Small burrows associated with fossorial species were infrequently observed on the project site, however they are of inadequate diameter to support BUOW; and, 3) there is a high level of soil compaction throughout the project site due to long-term use (i.e., truck movement and parking), which reduces overall vegetative cover, and thereby reduces the amount of available foraging habitat for BUOW. The project site itself is not within a MSHCP-required BUOW survey area (RCA, 2021a).

During the habitat assessment, no BUOWs, BUOW signs, or suitable burrows were observed. Therefore, focused surveys for BUOW are not recommended, and no impacts to BUOW are anticipated to occur as a result of the project.

Results and Discussion

The BSA does not contain suitable habitat to support special-status plant species, and none were observed during the surveys. However, the BSA contains large trees and other physical features that could potentially provide foraging, nesting, and cover habitats to support a diverse assortment of bird species (year-round residents, seasonal residents, and migrants). A majority of the birds observed during the field surveys and those birds that could potentially breed within the BSA are protected by the MBTA and Fish and Game Code (FGC) § 3503, § 3503.5, and § 3513. Potential impacts to species protected by the MBTA and § 3503, § 3503.5, and § 3513 FGC would be minimized or avoided with implementation of the following mitigation measures:

Mitigation Measures

MM BIO-1: Biological Monitor

- As per the MSHCP requirements stated in Volume 1, Appendix C of the MSHCP, A qualified project biologist shall monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat and species of concern outside the project footprint (RCTLMA, 2023).
- A biological monitor shall monitor activities that result in tree or vegetation removal to minimize the likelihood of inadvertent impacts to nesting birds and special-status wildlife species, with special attention given to any protected species observed during the pre-construction breeding bird surveys. Monitoring shall also be conducted periodically during construction activities to ensure no new nests are built during any vegetation removal or building demolition activities between February 1 and August 31. The biological monitor shall ensure that all BMPs, avoidance, protection and mitigation measures described in the relevant project permits and reports are in place and are adhered to.
- The biological monitor shall have the authority to temporarily halt all construction activities and all non-emergency actions if sensitive species and/or nesting birds are identified and would be directly affected. The monitor shall notify the appropriate resource agency and consult if needed. If necessary, the biological monitor shall relocate the individual outside of the work area where it would not be harmed. Work can continue at the location if the applicant and the consulted resource agency determine that the activity would not result in adverse effects to the species.
- The appropriate agencies shall be notified if a dead or injured protected species is located within the project site. Written notification shall be made within 15 days of the date and time of the finding or incident (if known) and must include; location of the carcass, a photograph, cause of death (if known), and other pertinent information.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MM BIO-2: Pre-Construction Breeding Bird Survey To maintain compliance with the MBTA and Fish and Game Code, and to avoid impacts or take of migratory non-game breeding birds, their nests, young, and eggs, the following measures will be implemented. The measures below will help to reduce direct and indirect impacts caused by construction on migratory non-game breeding birds to less than significant levels. • Project activities that will remove or disturb potential nest sites, such as open ground, trees, shrubs, grasses, or burrows, during the breeding season would be a potential significant impact if migratory non-game breeding birds are present. Project activities that will remove or disturb potential nest sites will be scheduled outside the breeding bird season to avoid potential direct impacts on migratory non-game breeding birds protected by the MBTA and Fish and Game Code. The breeding bird nesting season is typically from February 15 through September 15, but can vary slightly from year to year, usually depending on weather conditions. Removing all physical features that could potentially serve as nest sites will also help to prevent birds from nesting within the project site during the breeding season and during construction activities. • If project activities cannot be avoided during February 15 through September 15, a qualified biologist will conduct a pre-construction breeding bird survey for breeding birds and active nests or potential nesting sites within the limits of project disturbance. The survey will be conducted at least seven days prior to the onset of scheduled activities, such as mobilization and staging. It will end no more than three days prior to vegetation, substrate, and structure removal and/or disturbance. • If no breeding birds or active nests are observed during the pre-construction survey or they are observed and will not be impacted, project activities may begin and no further mitigation will be required. • If a breeding bird territory or an active bird nest is located during the pre-construction survey and will potentially be impacted, the site will be mapped on engineering drawings and a no activity buffer zone will be marked (fencing, stakes, flagging, orange snow fencing, etc.) a minimum of 100 feet in all directions or 500 feet in all directions for listed bird species and all raptors. The biologist will determine the appropriate buffer size based on the type of activities planned near the nest and the type of bird that created the nest. Some bird species are more tolerant than others of noise and activities occurring near their nest. This no-activity buffer zone will not be disturbed until a qualified biologist has determined that the nest is inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, or the young will no longer be impacted by project activities. Periodic monitoring by a biologist will be performed to determine when nesting is complete. Once the nesting cycle has finished, project activities may begin within the buffer zone. • If listed bird species are observed within the project site during the pre-construction survey, the biologist will immediately map the area and notify the appropriate resource agency to determine suitable protection measures and/or mitigation measures and to determine if additional surveys or focused protocol surveys are necessary. Project activities may begin within the area only when concurrence is received from the appropriate resource agency. • Birds or their active nests will not be disturbed, captured, handled or moved. Active nests cannot be removed or disturbed; however, nests can be removed or disturbed if determined inactive by a qualified biologist. Special-status plants and wildlife are not anticipated to occur within the BSA and thus impacts are anticipated to be less than significant. With implementation of mitigation measures **BIO-1** and **BIO- 2,** the proposed project would have less than significant impacts on nesting bird species protected by the MBTA and § 3503, § 3503.5, and § 3513 FGC. Implementation of mitigation measures **BIO-1** and **BIO-2** will further minimize or avoid impacts to special-status plant and wildlife species to a level which is less than significant.				
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒

Response:

No Impact

The project site is situated on relatively level ground, and no ephemeral, intermittent, or perennial streams or rivers were identified in the literature review or during field surveys, however a vernal pool complex (consisting of two vernal pools) was observed during the surveys. Vegetation within the vernal pool complex was similar to the vegetation observed elsewhere within the BSA and project site, consisting primarily of non-native annual grasses and forbs, several ornamental and some native plants. The two vernal pool areas contain both hydrophytic and upland vegetation, as well as open areas where water pools. The project site contains several trees concentrated along the southern edge of the project area. The land cover type observed within the BSA are described below.

Land Cover Types

The land cover types mapped in the BSA are briefly described below. No sensitive natural vegetation communities were observed within the BSA, as described in the California Department of Fish and Wildlife's (CDFW's) *California Natural Community List* (CDFW, 2022c) or in the *A Manual of California Vegetation Second Edition* (Sawyer et al., 2009). Therefore, there are no impacts to sensitive natural communities are anticipated as a result of the project.

Developed/Disturbed:

Developed/Disturbed lands occupy the entire project site (approximately 9.6 acres), The Developed/Disturbed land cover type is fully described in Section 2.1.3 of the MSHCP as areas that "*consist of areas that have been disced, cleared, or otherwise altered*". Developed lands may include roadways, existing buildings, and structures". (MSHCP Vol. 1 Sec 2.0). At this specific project site, Developed/Disturbed comprises developed surfaces and natural substrates dominated by non-native, ornamental vegetation. This developed or disturbed land cover type consists of areas that have been disked, cleared, or otherwise altered. Residential/urban/exotic lands may include roadways, existing buildings, and structures. Disturbed lands may include ornamental plantings for landscaping, escaped ornamental plants, or ruderal vegetation dominated by non-native, weedy species.

Developed/Disturbed lands form the entirety of the offsite land cover within the BSA and the entirety of the project site (onsite) land cover. Within the project site, disturbed/developed areas include residential/urban/exotic areas such as the depression located in the relative center of the project site and the large debris pile in the south eastern corner of the site. The depression contains vegetation such as clustered tarweed (*Deinandra fasciculata*), Russian thistle (*Salsola tragus*), horse nettle (*Solanum elaeagnifolium*), and curly dock (*Rumex crispus*). The debris pile is formed of various building materials and other discarded items. Developed/Disturbed areas on site also include non-native annual grasslands, which are characterized by the dominance of several species of grasses that have evolved to persist in concert with human agricultural practices or development related activities such as disking, brushing, grading, or overgrazing of native habitats.

In the BSA, disturbed/developed lands also include residential/urban/exotic areas comprised of areas occupied by residences, structures, sidewalks, commercial spaces, paved roads, dirt roads, flood control drainages, and all other impermeable surfaces that cannot support vegetation. The BSA also contains non-native annual grasslands as a component of the Developed/Disturbed land cover type.

Vernal Pool Complex

Vegetation at the vernal pool complex is significantly disturbed, likely due to repeated attempts by previous landowners to fill the pools (Google Earth Pro, 2022). The majority of the vegetation observed within the vernal pool complex consists of ruderal vegetation, dominated by non-native annual forbs (herb stratum). The plant species with the highest cover in the depressions include stinkwort (*Dittrichia graveolens*), hairy leaved sunflower (*Helianthus annuus*), knotweed (*Polygonum aviculare*), and nettle leaf goosefoot (*Chenopodium murale*).

Other plants recorded at the vernal pool complex during the wet season site visits include willow dock (*Rumex salicifolius*), nut grass (*Cyperus esculentis*), salt marsh sand-spurry (*Spergularia marina*), ryegrass (*Festuca perennis*), clustered tarweed (*Deinandra fasciculata*), and common sow thistle

(*Sonchus oleraceus*). No NWPL-designated wetland obligate plant species were observed in the vernal pool complex during the October 14, 2021 jurisdictional delineation survey or the subsequent site visits. A complete list of plants recorded at the vernal pool complex during the survey and the 2021-2022 wet season site visits is in **Appendix C1,** *Biological Resources Evaluation.*

Plant distribution within the vernal pools varies both spatially and temporally. During the wet season, plant cover is low in the centermost regions of each vernal pool, where the waters are deepest during periods of inundation; whereas, plant cover is higher near the edges of the vernal pools and consist of species that are tolerant of hydric conditions such as nettle leaf goosefoot, lamb's quarters (*Chenopodium album*), tumbleweed (*Amaranthus albus*), clustered tarweed, nut grass, goldentop (*Lamarckia aurea*), and willow dock are more prevalent. During the dry season, plant cover is higher in the centermost areas and consists of species that are tolerant of both upland and hydric conditions such as knotweed (*Polygonum aviculare*), tumbleweed, and nettle leaf goosefoot, doveweed (*Croton setiger*), and willow dock; whereas, the edges of the vernal pools consist of a lot of thatch of annual species that have died back as well as species more adapted to xeric conditions such as stinkwort, Russian thistle, and hairy leaved sunflower.

The disturbed plant community that occupies the wetland (vernal pool complex) does not fit any classification described in *Preliminary Descriptions of the Terrestrial Communities of California* (Holland, 1986) or in *A Manual of California Vegetation Second Edition* (Sawyer et al., 2009). Similarly, the plant community within the vernal pool complex does not contain any species mentioned in the description of the vernal pool vegetation community in Section 2.1.3 of the MSHCP (RCTLMA, 2023). However, the spatial and temporal vegetation distribution within the vernal pools is similar to distribution patterns typical of vernal pools. Although there is a weedy nature of the plant community within the vernal pools, it is distinct from the vegetated patches of the developed/disturbed land cover type in this report. Thus, the vernal pool complex is represented as a distinct land cover type. This community is considered low priority for inventory by CDFW and is not considered sensitive (CDFW, 2022c).

The BSA does not support riparian habitat or other sensitive natural communities. Both the literature review (CNDDB, 2022a) and results of the surveys indicate that riparian habitat or other sensitive natural communities do not occur on the project site. Therefore, construction of the project would not result in impacts on riparian habitat or sensitive natural communities identified in local, regional state, or federal plans, policies, or regulations. No impact would occur and no mitigation is proposed.

a) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐

Response:

<u>Less Than Significant Impact with Mitigation Incorporated</u>

The results of the literature review and the October 14, 2021 jurisdictional delineation survey determined that the project site contains waters of the State, which are under RWQCB jurisdiction in accordance with the California Porter-Cologne Water Quality Control Act and the Procedures (SWRCB Resolution No. 2019-0015).

Due to indications of repeated inundation seen on historic aerial imagery, the project site was investigated for the potential presence of wetlands during a biological survey conducted on September 21, 2021. The site was revisited on October 14, 2021 for delineation and mapping of these vernal pools. During this survey, aquatic invertebrates were observed in two ponded areas within one of the pools; this visit resulted in the delineation of two vernal pools, Vernal Pool-East (VP1) and Vernal Pool-West (VP2), constituting a vernal pool complex, on the east side of the project site (see **Figure 11** and **Appendix C1**, *Biological Resources Evaluation Report*).

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

The vernal pool complex (VP1 and VP2) is on the eastern side of the project site, adjacent to each other and separated by a narrow dirt path (see **Appendix A**, Figure 10, *Jurisdictional Impact Areas).* The larger vernal pool (VP1) is approximately 250-feet long by a width that ranges from approximately 10 to 40 feet. The smaller vernal pool (VP2) is directly west of VP1; the pools are separated by a 15-foot dirt path that crosses between the VP1 and VP2. VP1 is approximately 25-feet long by 50-feet wide. The area of VP1 is 0.24 acre (10,319 square feet) and that of VP2 is 0.02 acre (778 square feet).

These vernal pools receive water from stormwater and also from water discharged via a culvert on the eastern edge of VP1. This 24-inch plastic corrugated pipe is located at the eastern end of VP1 at the boundary of the project site and extends into the adjacent property (C5 Equipment Rentals and Maintenance). The culvert is buried in approximately four feet of soil, and the base of the culvert is directly beneath the base of the chain-linked fence that separates the two properties. Due to lack of public access to the equipment rental and maintenance facility, the source of the water discharging from the culvert could not be determined.

Additional basins were observed on the project site; however, none of these basins exhibited the criteria required for wetlands and, therefore, are considered puddles, tire ruts, etc.

These vernal pools constitute jurisdictional waters of the State; additionally, they are vernal pools as defined by the MSHCP. Project construction would result in permanent fill of VP1 and VP2; therefore, there are direct permanent impacts associated with this project**.** The following jurisdictional features are anticipated to be directly impacts as a result of the project:

- RWQCB waters of the State (isolated wetlands/vernal pools): 0.26 acre (11,097 square feet).
- EPD MSHCP wetland (vernal pools): 0.26 acre (11,097 square feet).

Direct impacts to jurisdictional wetlands, waters, water quality, water quantity, and aquatic/riparian habitats have immediate consequences, such as the changes that occur when land is cleared for permanent development and jurisdictional waters are altered or filled in during project construction activities. Examples of potential direct impacts which could destroy or significantly impact jurisdictional waters include any ground-disturbing activities, such as grading, clearing, ripping, grubbing, excavation, trenching, paving, or heavy equipment compacting that would remove or alter jurisdictional waters permanently. Other examples of potential direct impacts to jurisdictional waters include filling of onsite drainages, stockpiling, channelization, bank stabilization, road crossings, or any other permanent drainage modification. The permanent filling of wetlands is considered to be a significant impact.

To offset significant impacts resulting from the permanent loss of vernal pools, the applicant proposes to implement mitigation measure **BIO-3**, which would compensate through one or more of the following methods: (1) offsite compensatory mitigation lands (at a ratio of 3:1); (2) contribution to a mitigation bank or in-lieu fee program as necessary to fund replacement, restoration and conservation of equivalent habitat outside the project site at a ratio of 3:1, or as approved by the RWQCB and by the Riverside County Environmental Programs Department (EPD). Implementation of mitigation measure **BIO-3** would reduce the impacts to less than significant with mitigation incorporation.

Mitigation Measures

MM BIO-3: Mitigation for Loss of Isolated Wetlands/Vernal Pools

The applicant would compensate for the permanent loss of isolated wetlands/vernal pools through one or more of the following methods:

- offsite compensatory mitigation lands (at a ratio of 3:1);
- contribution to a mitigation bank or in-lieu fee program as necessary to fund replacement, restoration and conservation of equivalent habitat outside the project site at a ratio of 3:1;
- or as approved by the RWQCB and by the Riverside County Environmental Programs Department (EPD), following consultation with each of these agencies.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or	☐	☐	☐	☒

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
migratory wildlife corridors, or impede the use of native nursery sites?				

Response:

No Impact

Reports, information, and databases associated with the MSHCP and the Western Riverside County – Regional Conservation Authority (RCA) MSHCP Information Map (MSHCP Information Map were used to identify criteria areas within the BSA (RCA, 2021a). Per the *MSHCP Information Map*, the project site is not within a proposed/existing core, habitat block, or linkage. CDFW Natural Landscape Blocks and Essential Connectivity Areas are located approximately 2.3 miles north of the project site, see **Figure 12**.

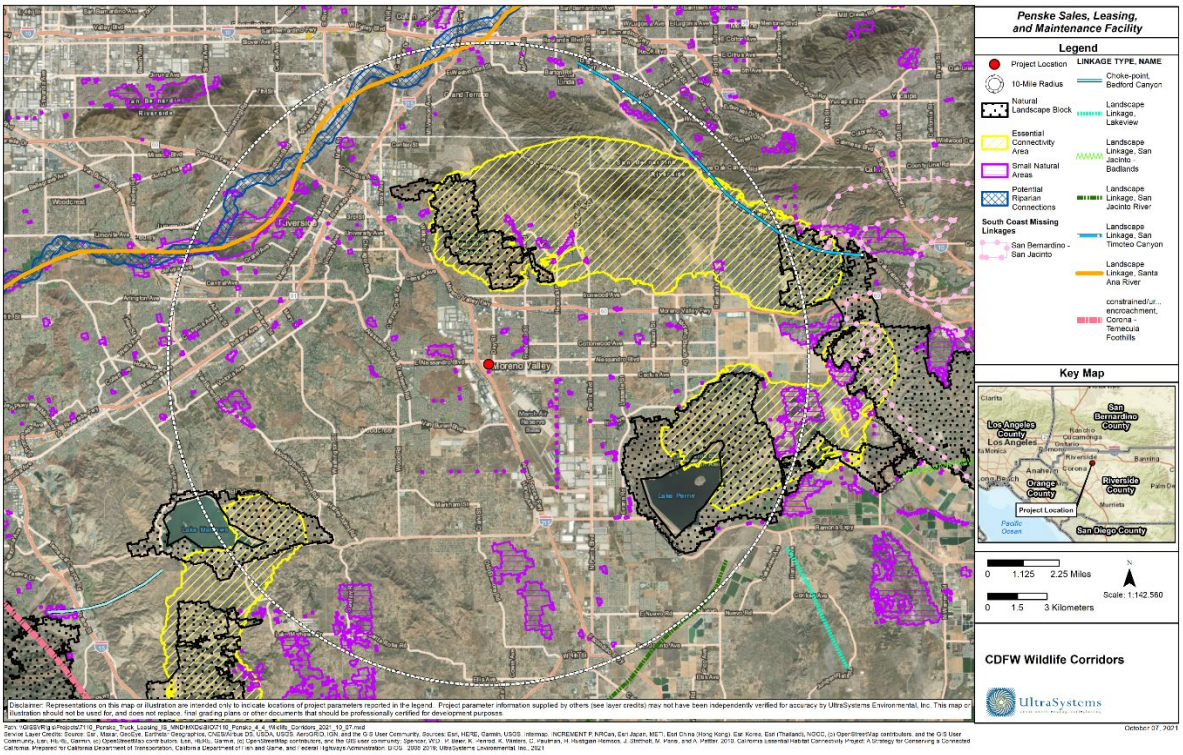
Construction and operation of the proposed project would not interfere with the movement of any native resident or migratory fish or wildlife species or with native resident or migratory wildlife corridors. No impact would occur, and mitigation is not proposed.

The literature review and field surveys determined that the project site does not contain wildlife corridors or native wildlife nursery sites. Therefore, no mitigation is proposed.

Figure 11 - Jurisdictional Impact Areas

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

Figure 12 - CDFW Wildlife Corridors



e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

Response:

No Impact

Ordinance No. 923 (Ordinance) is an ordinance of the city council of the City of Moreno Valley amending the municipal code to add chapter 14.40, which will adopt regulations for the planting and maintenance of trees within the city. Chapter 14.40 of the City's municipal codes outlines the regulations implemented for the planting and maintenance of trees within the City. See Section 3.3.2 of the BRE for a further discussion of the provisions of the Ordinance.

The BSA does not contain trees (heritage trees) that qualify for protection under City of Moreno Valley Municipal Code Section 9.17.030. The small trees, tree re-sprouts, tree saplings and shrubs on the project site do not meet the criteria presented in the Ordinance for categorization as "heritage trees". The project would not conflict with local policies or ordinances aiding in the protection of

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

Response:

Less Than Significant Impact with Mitigation Incorporated

The project site is located within the MSHCP plan area in Western Riverside County. Each project located within the plan area must be consistent with the MSHCP. **Table 14** provides a list of MSHCP conditions that were considered for this analysis.

Table 14 - MSHCP Project Review Checklist

MSHCP Conditions	Yes	No
Are riverine/riparian/wetland habitats or vernal pools present?	**X**	
Is the project located in Narrow Endemic Plant Species Survey Area?		□
Is the project located in a Criteria Area or Public/Quasi-Public Land?		□
Is the project located in Criteria Area Amphibian Survey Area?		□
Is the project located in Criteria Area Burrowing Owl Survey Area?		□
Is the project located in Criteria Area Mammal Survey Area?		□
Is the project located adjacent to MSHCP Conservation Areas?		□

Resources that would be directly impacted by construction of the project is listed below:

- Vernal Pools

Wildlife Species

California horned lark (*Eremophila alpestris actia*), which is on the List of Covered Species Adequately Conserved presented in Exhibit D of the MSHCP (RCA, 2003), was observed on the project site during a February 16, 2022 ponding survey check. No wildlife species that are not adequately conserved under the MSHCP were observed within the BSA during any of the surveys. The results of the literature review and field surveys concluded that there is suitable habitat on the project site for special-status fairy shrimp species due to the presence of the vernal pool complex on the project site, however these special-status fairy shrimp were not observed during the focused fairy shrimp surveys. The majority of the other listed wildlife species in the wildlife inventory, excluding fairy shrimp, were determined to have no potential to occur or are not expected to occur due to lack of suitable biological and physical features that are adequately needed to support them.

Additionally, the BSA supports large trees that could potentially support birds that are protected by the MBTA, such as several species observed during. Each of these species was determined to have a low potential to occur in the BSA.

Conducting a pre-construction breeding bird survey (**BIO-3**) will aid to reduce impacts to MBTA-protected birds to a less than significant degree.

Vernal Pools

The BSA was assessed for areas meeting the MSHCP's definition of vernal pools and fairy shrimp habitat during the habitat assessment and other field surveys. There are two vernal pool areas in the southeast quadrant of the project site that lie in an east-to-west orientation with the eastern end of the larger vernal pool area terminating at the eastern border of the project site. (see **Figure 13 - Management Plan and Land Designation Areas**) The smaller vernal pool areas is covers approximately 0.24 acre of the project site, while the larger vernal pool area covers approximately 0.018 acre. The combined acreage of both vernal pool areas totals approximately 0.25 acre.

A 24-inch corrugated plastic culvert is located at the eastern end of the larger vernal pool area. It is buried approximately four feet below the base of the chain link fence that separates the project site from the property to the east. It appears that water flow periodically discharges from the culvert into the vernal pool area. The source of the culvert could not be determined as there was no public access to the

adjoining property. These areas were determined to be a wetlands/vernal pool complex based on the following findings: 1) presence of fairy shrimp, an indicator species of vernal pools, 2) ponded water within the depressions that seemed to persist for at least a week, 3) cracked mud throughout base of depressions indicating sustained inundation, 4) hydrophytic vegetation listed on NWPL, and 5) soil texture consistent with clay loam soils During the survey, there were two areas of ponded water within the larger depression. Biologists observed fairy shrimp within both vernal pool areas during the October 14 2021 Jurisdictional Delineation Survey (see **Appendix C1,** *Biological Resources Evaluation Report*).

Focused Fairy Shrimp Surveys

To maintain compliance with the MSHCP Survey Requirements, focused fairy shrimp surveys were conducted during the 2021-2022 wet and dry seasons (**Appendix C2,** *2021/2022 Wet Season Presence/Absence Survey for Vernal Pool Branchiopods* and **Appendix C3,** *2022 Dry Season Survey Report for List Large Branchiopods*).

No special-status fairy shrimp, including those addressed in the MSHCP, were observed during any of the focused surveys conducted from 2021-2022 by Dudek biologist Paul Lemons (see **Appendices G & H** of the BRE for the results of the wet and dry season focused fairy shrimp surveys). Direct impacts to vernal pools and fairy shrimp are anticipated as a result of construction of the project because these vernal pools provide suitable habitat for special-status fairy shrimp, although none were observed during surveys. In addition, one species of fairy shrimp, versatile fairy shrimp (*Branchinecta lindahli)* was observed. This species is not protected by federal and/or state agencies, and is not protected under the MSHCP or any other local and/or regional plans and/or ordinances.

The presence of this species indicates that the conditions within the vernal pool complex on the project site are consistent with the conditions favored by fairy shrimp species and therefore is considered to provide suitable fairy shrimp habitat. Mitigation is required as a result. Consultation with RWQCB and MSHCP is necessary to determine mitigation requirements for impacts to wetland/vernal pool complex habitat.

Other Potential Impacts to MSHCP Biological Resources

Although the primary biological resource that would potentially be impacted by construction of the project are vernal pools, there are other resources that may be impacted by the project. To comply with MSHCP requirements, various BMPs and other mitigation measures will be implemented so that impacts to biological resources covered by the MSHCP would be less than significant.

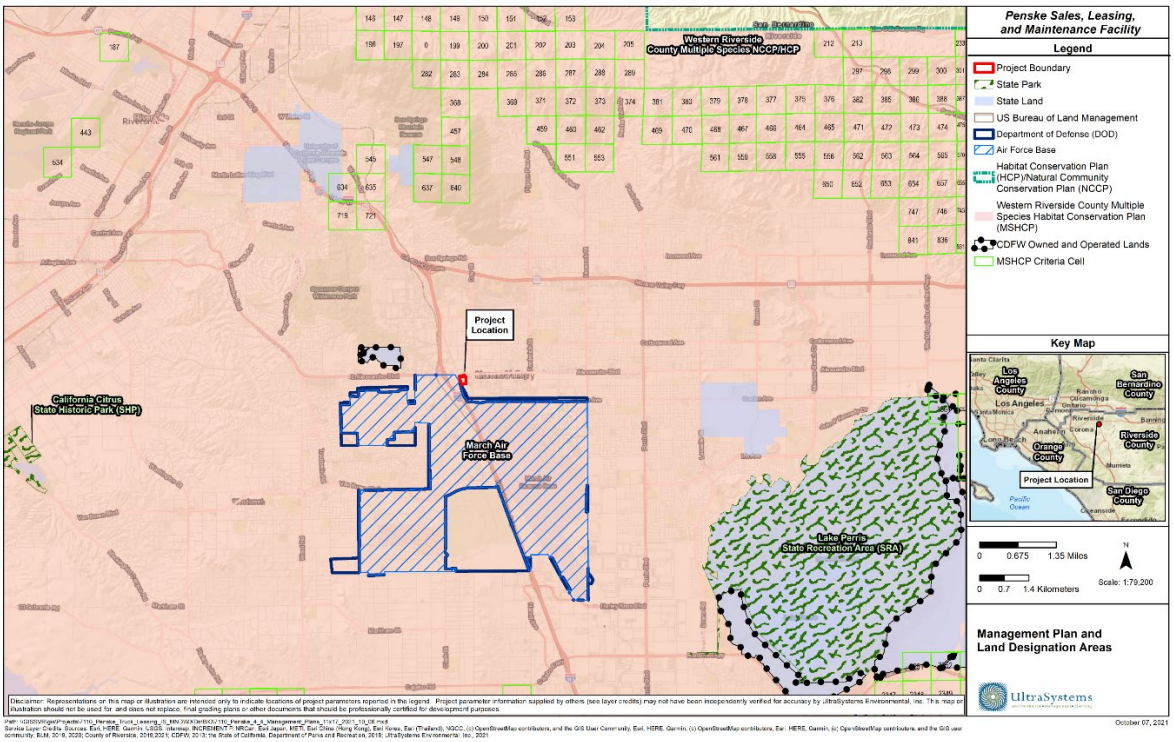
Level of Significance

With implementation of mitigation measures **BIO-1 through BIO-3,** which are discussed in previous sections, the proposed project would have less than significant impacts to biological resources covered by the MSHCP.

As described in detail in **Appendix C1,** *Biological Resources Evaluation Report* (Section 6.0), the project is consistent with the MSHCP with inclusion of the recommended mitigation measures **BIO-1 thorough BIO-3**. As such, the project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP, and potential impacts would be less than significant with implementation of mitigation measures.

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

Figure 13 - Management Plan and Land Designation Areas



V. CULTURAL RESOURCES – Would the project:

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

Response:

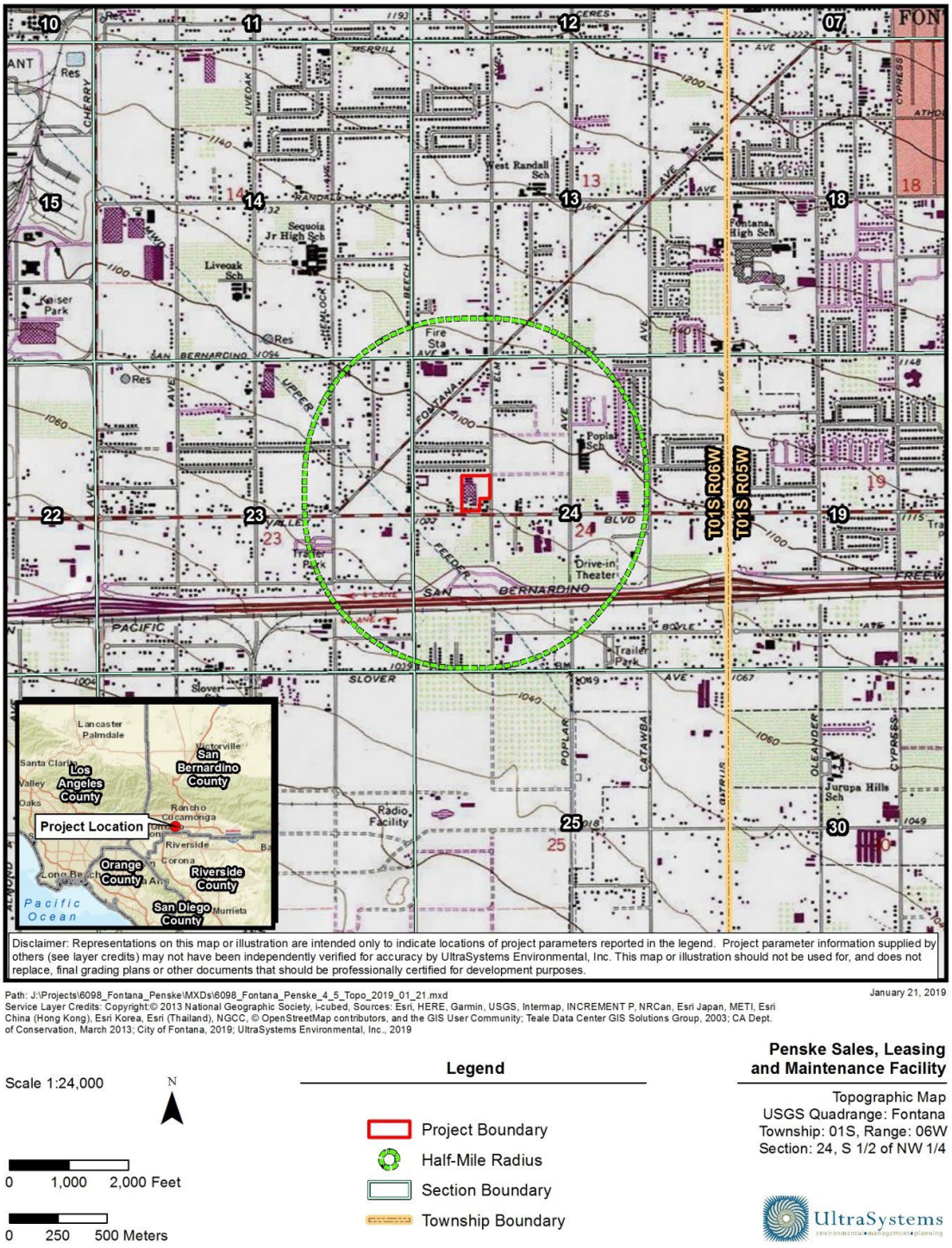
Methodology

A cultural resources analysis was conducted for the Penske project site (refer to **Figure 14**). It included a California Historic Resources Inventory System (CHRIS) records and literature search at the Eastern Information Center (EIC) located at the University of California, Riverside. Additionally, a request was made to the Native American Heritage Commission (NAHC) to conduct a search of its Sacred Lands File (SLF) for potential traditional cultural properties as well as to provide a list of local Native American tribes and tribal representatives to contact. Finally, a pedestrian survey of the project site was completed. The EIC records search was conducted and provided on December 1, 2021. The NAHC request was made on September 17, 2021, and a reply was received on October 23, 2021; letters were sent to the listed tribes on November 1, 2021, and follow-up telephone calls were conducted on May 6, 2022. The pedestrian field survey was conducted on December 9, 2021.

Existing Conditions

Based on the cultural resources records search, it was determined that no historic cultural resources have been previously recorded within the project site boundary. Within the 0.5-mile buffer zone, there has been one prehistoric archaeological site and 12 previously recorded historic-era cultural resources. **Section 4.1** in **Appendix D1** of this document describes these resources.

Figure 14 - Topographic Map



Approximately 0.5-mile due west of the project boundary is (CA-RIV-5429), a prehistoric milling stone outcrop with 12 milling elements and five granite features (Giacomini 1994). An historic refuse scatter (CA-RIV-4193) containing glass, ceramics, and can metal (Schmidt et al. 1990) is recorded as located approximately 0.25 mile to the west of the project site. During the pedestrian survey this area along Alessandro Boulevard west of the project site was driven through and it was observed that both the milling feature and historic trash feature had since been developed and built upon. Running along the

west side of the project boundary is the San Jacinto Valley Railway (33-015743) extension of the Southern California Railway that was built in 1888 (Easter and Beedle 2005) and abandoned by 1978. To the north and east of the project boundary, north of Alessandro Boulevard is a series of 10 historic small residential properties constructed in the 1940s through 1950s, four recorded in 1983 and six recorded in 2008 (see Table 4.1-1 in **Appendix D1**). During the pedestrian survey of the project site this area along Alessandro Boulevard east of the project site was observed and it was seen that all of these structures had since been demolished and removed.

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact

A historical resource is defined in § 15064.5(a)(3) of the CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as being: associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered as historical resources under CEQA.

Similarly, the National Register criteria (contained in 36 CFR 60.4) are used to evaluate resources when complying with Section 106 of the National Historic Preservation Act (NHPA). Specifically, the National Register criteria state that eligible resources comprise districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that: (a) are associated with events that have made a significant contribution to the broad patterns of our history; or (b) that are associated with the lives of persons significant in our past; or (c) that embody the distinctive characteristics of a type, period, or method of construction, or that possess high artistic values, or that represent a significant distinguishable entity whose components may lack individual distinction; or (d) that have yielded or may be likely to yield, information important to history or prehistory.

A substantial adverse change in the significance of a historical resource as a result of a project or development is considered a significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. Direct impacts are those that cause substantial adverse physical change to a historic property. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historic property, such that the significance of a historical resource would be materially impaired.

With the absence of any historic cultural resources within the project site boundary or immediately adjacent, no impacts on historic resources would be associated with the development of the project.

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

Response:

Less than Significant Impact with Mitigation Incorporated

An archaeological resource is defined in § 15064.5(c) of the CEQA Guidelines as a site, area or place determined to be historically significant as defined in § 15064(a) of the CEQA Guidelines, or as a unique archaeological resource defined in § 21083.2 of the Public Resources Code as an artifact, object, or site that contains information needed to answer important scientific research questions of public interest or that has a special and particular quality such as being the oldest or best example of its type, or that is directly associated with a scientifically recognized important prehistoric or historic event or person. Though apparently long fallow, the agricultural nature of the project site and level elevation relative to adjacent roads suggest that ground here has been minimally disturbed, with the native surface soil remaining. The cultural resources investigation conducted by UltraSystems, which included a CHRIS

records search of the project site and buffer zone, a search of the SLF by the NAHC, and pedestrian field survey, leads to the conclusion that it is unlikely that undisturbed unique archaeological resources exist on the project site.

The cultural resources records search conducted by the EIC determined that there are no known prehistoric cultural resource sites or isolates recorded within the project boundary. The result of the pedestrian survey was negative for both prehistoric and historic sites and isolates on the project site.

According to records at the EIC, two previous cultural resource surveys have included a portion of the project area, and 20 surveys have been conducted within the 0.5-mile radius project buffer but not within the project APE (**Table 4.5-2** in **Appendix D**). As noted above, none of these surveys recorded prehistoric or historic cultural resources within the project boundary.

A NAHC SLF search was conducted on and within a 0.5-mile buffer around the project site. The NAHC letter of October 23, 2021 indicated that no records exist documenting the presence of traditional cultural properties within this area.

Twenty-two representatives of the Native American tribes identified by NAHC were contacted requesting a reply if they have knowledge that they wished to share of cultural resources in the area, and asking if they had any questions or concerns regarding the project. These tribes are:

- Gabrieleno Band of Mission Indians – Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino Tongva Indians of California Tribal Council
- Agua Caliente Band of Cahuilla Indians
- Soboba Band of Luiseño Indians
- Gabrielino/Tongva Nation
- Gabrielino-Tongva Tribe
- Morongo Band of Mission Indians
- Quechan Tribe of the Fort Yuma Reservation
- Santa Rosa Band of Cahuilla Indians
- San Manuel Band of Mission Indians
- Serrano Nation of Mission Indians

On November 2, 2021, Historic Preservation Officer Jill McCormick of the Quechan Tribe of the Fort Yuma Reservation responded via email indicating that the tribe has no comments on this project and would defer to the more local Tribes and support their decisions on the project. Also on November 2, 2021, Tribal Historic Preservation Officer Joseph Ontiveros with the Cultural Resource Department of the Soboba Band of Luiseño Indians responded that “Based on the results of our internal database search, the project location and adjacent areas are considered sensitive to the Soboba Band, as the project is located within an identified TCR/TCL, considered eligible for listing on the California Register of Historic Resources, and the National Register of Historic Places. Substantial information relating to the identified Tribal Cultural Resource will be disclosed to the lead agency during formal consultation.”

On November 9, 2021, Cultural Resources Coordinator Paul Macarro of the Pechanga Band of Luiseño Indians responded indicating the tribe is experiencing a delay in the NAHC’s posting of their Sacred Lands File site for this Sycamore Canyon area and that a revised Clearinghouse [CHRIS] search would likely show a positive SLF filing. A letter attached to the email indicates that the project area is not within the tribe’s reservation land but is within their ancestral territory and that within the project area they have identified a Traditional Cultural Property. The tribe also requested copies of all archaeological records collected as well as to conduct AB-52 consultation. The tribe requested that both archaeological and tribal monitoring take place during construction excavation. On November 17, 2021, Mr. O’Neil contacted the NAHC to ask about a revised Sacred Land File search, but no response has been received from the NAHC. Mr. O’Neil emailed Mr. Macarro on November 30 2021 asking if they would like to have someone accompany him on a survey of the project area; no response was received. Mr. O’Neil emailed Mr. Macarro on November 17, 2021 indicating he realized that if the NAHC identified the Sacred Lands File that they would then direct him to contact the tribe for information on it and therefore Mr. O’Neil requested information about the TCR site mentioned by Mr. Paul Macarro; no response has been received.

On November 10, 2021, Tribal Historic Preservation Officer Shasta Gaughen of the Pala Band of Mission Indians responded by email indicating that the project is not within the boundaries of the reservation and

also beyond the boundaries of the territory that the tribe considers its Traditional Use Area. She indicated that the project is situated "in close proximity to the Reservation and information generated would likely be useful in better understanding regional culture and history," and requested that the tribe be kept in the loop as the project progresses. Ms. Gaughen suggested that tribal monitors be on site during ground disturbing work.

On December 3, 2021, Director, Cultural Resources Patricia Garcia-Plotkin of the Agua Caliente Band of Cahuilla Indians, replied indicating the project area is not located within the boundaries of the ACBCI Reservation but it is within the Tribe's Traditional Use Area.

On December 7, 2021, Tribal Historic Preservation Officer Cheryl Madrigal of the Rincon Band of Luiseño Indians responded indicating that the project location is within the territory of the Luiseño people, and is also within the Tribe's specific area of historic interest but that they have not identified known Tribal Cultural Resources or Traditional Cultural Properties that have been previously recorded within the project area. Ms. Madrigal indicated that the Rincon Band believes the potential exists for cultural resources to be identified during further research and survey work.

On February 1, 2022, Tribal Historic Preservation Officer Ann Brierty of the Morongo Band of Mission Indians replied via email indicating that the project is within the ancestral territory and traditional use area of the tribe. Projects within this area are known to be potentially sensitive for cultural resources regardless of the presence or absence of remaining surface artifacts and features. The tribe requested to conduct AB 52 consultation with the lead agency, the City.

Following up on the initial letter and email contacts, telephone calls were conducted by Archaeological Technician Megan Doukakis on May 6, 2022, to complete the outreach process. These calls were to the nine tribal contacts who had not responded to UEI mailing and email. Three telephone calls were placed with no answer and therefore messages were left describing the project and requesting a response. These were to Chairperson Doug Welmas of the Cabazon Band of Indians, Director of Cultural Resources Jessica Mauck of the San Manuel Band of Mission Indians, and Tribal Chair Lovina Redner of the Santa Rosa Band of Cahuilla Indians. Four calls were answered by tribal office receptionists and Ms. Doukakis was instructed to email our material to a new email address. There were other calls to Chairperson Amanda Vance of the Augustine Band of Cahuilla Mission Indians, Chairperson Daniel Salgado of the Cahuilla Band of Indians, Chairperson Ray Chapparosa of the Los Coyotes Band of Cahuilla and Cupeño Indians, and Chairperson Joseph Hamilton of the Ramona Band of Cahuilla. A phone call to Cultural Resources Coordinator Michael Mirelez of the Torres-Martinez Desert Cahuilla Indians was placed, but there was no answer and the voicemail was full so no message could be left. There have been no further responses from these tribes to date (see **Attachment C**).

The result of the pedestrian survey was negative for both prehistoric and historic sites and isolates on the project site. Based on the results of the records search, tribal consultation, and the onsite field survey it is unlikely that cultural resources or tribal resources would be adversely affected by construction of the project. However, grading activities associated with development of the project would cause new subsurface disturbance and could potentially result in the unanticipated discovery of archaeological resources.

Mitigation Measure

MM CUL-1: **Archaeological Monitoring:** At least 30 days prior to grading permit issuance and before any grading, excavation, and/or ground-disturbing activities on the site take place, the project permittee/owner shall retain a Riverside County-certified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources. Prior to grading, the project permittee/owner shall provide to the City verification that a certified archaeological monitor has been retained. Any newly discovered cultural resource deposits shall be subject to a cultural resources evaluation.

The Project Archaeologist shall manage and oversee monitoring for all initial ground disturbing activities and excavation of each portion of the project site including clearing,

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

grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition and etc. The Project Archaeologist shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with any required special interest or tribal monitors.

A final report documenting the monitoring activity and disposition of any recovered cultural resources shall be submitted to the City of Moreno Valley and the Eastern Information Center within 60 days of completion of monitoring.

MM CUL 2: **Worker Environmental Awareness Program:** The Project Archeologist shall attend the pre-grading meeting with the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The Training will include a brief review of the cultural sensitivity of the Project and the surrounding area, what resources could potentially be identified during earthmoving activities, the requirements of the monitoring program, the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated, and any other appropriate protocols. All new construction personnel that will conduct earthwork or grading activities that begin work on the project following the initial Training must take the Cultural Sensitivity Training prior to beginning work and the Project Archaeologist shall be available to provide the training on an as-needed basis

MM CUL-3: **Native American Monitoring:** Native American Tribal monitors shall also participate in monitoring of ground-disturbing activity. At least 30 days prior to issuance of grading permits, an agreement between the permittee/owner and the Consulting Tribe(s) shall be developed regarding prehistoric cultural resources and shall identify any monitoring requirements and treatment of Tribal Cultural Resources (TCRs) so as to meet the requirements of CEQA. The monitoring agreement shall address the treatment of known Tribal Cultural Resources, the designation, responsibilities, and participation of professional Native American Tribal monitors during grading, excavation, and ground-disturbing activities, project grading, and development scheduling. (Also see **MM TCR-2**.)

MM CUL-4 If historical or unique archaeological resources are discovered during construction, the contractor shall halt construction activities in the immediate area and notify the City. An on-call qualified archaeologist shall be notified and afforded the necessary time to recover, analyze, and curate the find(s). The qualified archaeologist shall recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area and afforded the necessary time and funds to recover, analyze, and curate the find(s). Following analysis, historic resources may be offered to a local accredited repository (such as the Western Science Center located in Hemet); cultural resources of Native American origin will initially be offered to the tribe or tribes who have stated an interest in the TCRs during AB 52 consultation with the City. Construction activities may continue on other parts of the project site while evaluation and treatment of historical or unique archaeological resources takes place.

Level of Significance After Mitigation

With implementation of mitigation measure **MM CUL-1, MM CUL-2, MM CUL-3** and **MM CUL-4** above, potential impacts related to archaeological resources would be less than significant.

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

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

Response:

Less than Significant with Mitigation Incorporated

As previously discussed in **Cultural Resources)**, the project would be built on relatively undisturbed, fallow agricultural land that has not been previously graded. No human remains have been previously identified or recorded onsite. It is unlikely that undisturbed unique archaeological resources exist on the project site. The project proposes grading activities for the implementation of infrastructure that includes water, sewer and utility lines. Grading and trenching activities associated with development of the project would cause new subsurface disturbance and could result in the unanticipated discovery of unknown human remains, including those interred outside of formal cemeteries.

California Health and Safety Code § 7050.5 identifies procedures for the discovery of human remains. CEQA § 15064.5 indicates the process for determining the significance of impacts on archaeological and historical resources. California Public Resources Code § 5097.98 stipulates the notification process during the discovery of Native American human remains, descendants, disposition of human remains, and associated artifacts.

Mitigation Measure

MM CUL-5: If human remains are encountered during excavations associated with this project, all work shall stop within a 30-foot radius of the discovery and the Riverside County Coroner will be notified (§ 5097.98 of the Public Resources Code). The Coroner will determine whether the remains are recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the NAHC. The NAHC will be responsible for designating the Most Likely Descendant (MLD). The MLD (either an individual or sometimes a committee) will be responsible for the ultimate disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of their notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code).

In the unlikely event of an unanticipated discovery, implementation of **MM CUL-5** and adherence to all applicable codes and regulations would ensure that impacts related to the accidental discovery of human remains would be less than significant.

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

Response:

Less than Significant Impact

Mobile Source Energy Consumption

Construction Use

Project construction would consume energy in the form of petroleum-based fuels associated with the use of offroad construction vehicles and equipment on the project site, construction workers' travel to and from the project site, and delivery and haul truck trips hauling solid waste from and delivering building materials to the project site.

Trucks and other construction equipment would be required to comply with the California Air Resources Board (ARB) anti-idling regulations. ARB's In-Use Off-Road Diesel-Fueled Fleets regulation would also apply. Vehicles driven to or from the project site (delivery trucks, construction employee vehicles, etc.) are subject to fuel efficiency requirements established by the Federal Government. Therefore, project construction activities regarding fuel use would not result in wasteful, inefficient, or unnecessary consumption, and impacts would be less than significant.

Operation
During operations, the majority of fuel consumption resulting from the project would involve the use of motor vehicles traveling to and from the project site, as well as fuels used for alternative modes of transportation that may be used by employees and visitors to the project site. The estimated project operational motor vehicle fuel use is shown in **Table 15**.

The project would comply with all applicable regulations and codes that require the achievement of various levels of energy efficiency in building operations. These include the 2022 California Energy Efficiency Standards for Nonresidential Buildings (California Code of Regulations Title 24, Part 6); and the 2022 California Green Building Standards Code (CALGreen; California Code of Regulations Title 24, Part 11).

Electricity Energy
Moreno Valley Utility (MVU) will provide electric power for the proposed project. During the fiscal year 2019/2020, MVU provided approximately 202 gigawatt-hours of electricity to its customers (MVU, 2020). The project site is in an urbanized area with existing electric distribution lines. The project would be constructed in accordance with all applicable Title 24 regulations, and project development would not require the construction or relocation of electric power facilities.

Construction Use
Temporary electric power for as-necessary lighting and electronic equipment would be provided by MVU. The amount of electricity used during construction would be minimal, as demand would primarily stem from the use of electrically powered hand tools. The electricity used for construction activities would be temporary and minimal; therefore, project construction would not result in wasteful, inefficient, or unnecessary consumption of electricity, and impacts would be less than significant.

Operational Use
Project operation would require electricity for multiple purposes including, but not limited to, building heating and cooling, lighting, appliances, and electronics. Additionally, the supply, conveyance, treatment, and distribution of water used by the project would indirectly result in electricity usage. The California Emissions Estimator Model (CalEEMod), as part of the air quality and greenhouse gas emissions analyses, was used to estimate the electricity demand for the proposed project, which is shown in **Table 15**.

Table 15 - Estimated Project Operational Energy Use

Energy Type	Units Per Year	Value	Per Capita[a]
On-road Motor Vehicle Travel (petroleum-based fuel)[b]	Gallons of gasoline	23,413	555
	Gallons of diesel	2,247	1
	Total gallons of petroleum-based fuel	**25,660**	**556**
Electricity Use	Kilowatt-hours	247,862	7,996
Natural Gas Use	1,000 BTU	692,363	22,334

[a]Based upon estimated jobs of 31; see **Section 4.14**. The per capita value for the on-road motor vehicle fuel consumption is calculated from the fuel consumption by passenger vehicles.
[b]On-road Motor Vehicle Fuel Consumption calculated by UltraSystems using EMFAC2021(v1.0.2) emissions inventory web platform tool (ARB, 2022) and CalEEMod (2020.4.0) (CAPCOA, 2022); see **Appendix B**.

Natural Gas Energy
The Southern California Gas Company (SoCalGas) is the primary distributor of retail and wholesale natural gas across Southern California, including the City of Moreno Valley. SoCalGas provides services to residential, commercial, and industrial consumers, and also provides gas for electric generation customers. In its 2020 California Gas Report (CGR), SoCalGas had projected an annual decrease in demand of 1.1 percent from 2022 to 2035; in the 2022 CGR, the projected decrease had risen to an annual rate of 1.5 percent. The forecasted accelerated decline in throughput demand is being driven by

modest economic growth and the forecasted energy efficiency and fuel substitution. Other factors that contribute to the downward trend are tighter standards created by revised Title 24 Codes and Standards, and renewable energy goals that impact gas-fired electricity (California Gas and Electric Utilities, 2022. p. 115).

Construction Use
Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Any minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible and would not have an adverse effect; therefore, construction would not result in wasteful, inefficient, or unnecessary consumption of natural gas, and the impacts would be less than significant.

Operational Use
Natural gas consumption during operation would be required for various purposes, including building heating and cooling. The California Emissions Estimator Model (CalEEMod), as part of the air quality and greenhouse gas emissions analyses, was used to estimate natural gas demand for the proposed project, which is shown in **Table 15.** The impacts would be less than significant.

Summary
UltraSystems used data from EMFAC2021 to estimate petroleum-based transportation fuel use and CalEEMod Version 2020.4.0 to estimate natural gas and electricity use. The project would consume approximately 25,660 gallons of petroleum-based fuel per year during operation. By comparison, approximately 22 billion gallons of petroleum were consumed in California in 2020 (EIA, 2022). The anticipated increase in consumption associated with one year of project operation is 0.0001 percent (25,660/22,000,000,000) of the statewide use. Although the implementation of the project would result in an increase in petroleum use during operation, over time, vehicles would use less petroleum due to advances in fuel economy and alternative fuels.

The project would consume approximately 247,862-kilowatt hours of electricity per year and 692,363 thousand British thermal units (Btu) of natural gas per year. SoCalGas produced approximately 77 billion Btu in 2021 for the commercial customer service area (California Gas and Electric Utilities, 2022. p. 122). The increase in electricity and natural gas demand at the project site would be 0.0009%, which is negligible relative to the use in MVU and SoCalGas's service area.

Continued use of energy resources is consistent with the anticipated growth within the city and the general vicinity and would not result in energy consumption requiring a significant increase in energy production for the energy provider. Based on the information provided above, the proposed project would have a less than significant impact regarding wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

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

Response:

<u>Less Than Significant Impact</u>
The proposed project is required to be in compliance with the applicable 2022 Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6) and California Green Building Standards Code (California Code of Regulations, Title 24, Part 11). Hence, the impact will be less than significant.

Title 24 Building Energy Efficiency Standards
The Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The provisions of Title 24, Part 6 apply to all buildings for which an application for a building permit or renewal of an existing permit is required by law. They regulate the design and construction of the building

envelope, space-conditioning and water-heating systems, indoor and outdoor lighting systems of buildings, and signs located either indoors or outdoors. Title 24, Part 6 specifies mandatory, prescriptive, and performance measures, all designed to optimize energy use in buildings and decrease overall consumption of energy to construct and operate residential and non-residential buildings. Mandatory measures establish requirements for the manufacturing, construction, and installation of certain systems, equipment, and building components that are installed in buildings.

The latest version of Title 24 of the California Code of Regulations (Title 24) was published on July 1, 2022, and became effective on January 1, 2023 (State of California, 2023a). Below are the modified chapters in Part 6 Building Energy Efficiency Standards (State of California, 2023).

Nonresidential What's New for 2022 Summary
Under the 2022 Building Energy Efficiency Standards (Energy Code), major changes to nonresidential and hotel/motel building requirements include new photovoltaic (PV) and energy storage system requirements, a prescriptive heat pump space-conditioning baseline for certain climate zones, requirements for dedicated outdoor air systems (DOAS), and the addition of new covered processes, including controlled environment horticulture spaces.

Title 24 California Green Building Standards Code
The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11) commonly referred to as the CALGreen Code, is a statewide mandatory construction code developed and adopted by the California Building Standards Commission and the Department of Housing and Community Development. The CALGreen standards require new residential and commercial buildings to comply with mandatory measures under the topics of planning and design, energy efficiency, water efficiency/conservation, material conservation and resource efficiency, and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt that encourage or require additional measures in the five green building topics.

During the 2021 Triennial Code Adoption Cycle, California state agencies reviewed the most recent editions of national model codes and standards, and made amendments and additions to most parts of the California Building Standards Code, Title 24 of the California Code of Regulations (Title 24) which became effective on January 1, 2023.

City of Moreno Valley General Plan
The MoVal General Plan 2040, the General Plan Update, was adopted on June 15, 2021 by the City Council of the City of Moreno Valley. The MoVal General Plan 2040 provides a long-range policy guide to address changes in the City. Chapter 10, Open Space and Resource Conservation, focuses on energy resources and energy conservation. It includes policies for promoting the conservation of energy, renewable energy strategies, and reduction of energy consumption (Dyett & Bhatia, 2021a. pp. 10-14 and 10-15).

The proposed project will comply with all applicable City of Moreno Valley energy policies. MVU is a municipally-owned utility company, which provides the City with an avenue to directly influence consumer behavior through programs and incentives that encourage energy conservation. MVU runs energy efficiency programs that offer retrofits, rebates, and energy audits to residential and commercial customers (Dyett & Bhatia, 2021a. pp. 10-14).

The proposed project's design features will reduce emissions and contribute to energy efficiencies, including the use of high-efficiency light bulbs and lighting fixtures, recycled water, and bio-retention basins.

The proposed project would adhere to applicable federal, state, and local requirements for energy efficiency, including Title 24 standards and Moreno Valley General Plan requirements. Therefore, project impacts would be less than significant.

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

City of Moreno Valley Climate Action Plan
California Assembly Bill 32 - California Global Warming Solutions Act (AB 32) sets a target to decrease emissions statewide to 1990 levels by the year 2020. Reducing greenhouse gas emissions to 1990 levels means cutting approximately 30 percent from business-as-usual emissions levels projected for 2020, or about 15 percent of today's levels.

The City of Moreno Valley recognizes the impact carbon emissions have on global climate change. The Moreno Valley Climate Action Plan (CAP) is designed to reinforce the City's commitment to reducing greenhouse gas (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 a streamlined environmental review of future development projects, in accordance with the California Environmental Quality Act (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.
- Monitoring and reporting processes to ensure targets are met.

The CAP, which has been prepared concurrently with the updated Moreno Valley General Plan, provides an analysis of GHG emissions to the year 2040, which is the horizon year for the General Plan.
The proposed project would adhere to applicable federal, state, and local requirements for energy efficiency, including Title 24 standards and Moreno Valley General Plan requirements. Therefore, the project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS – Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf	☐	☐	☐	☒

Response:

No Impact
The Alquist-Priolo Zones Special Studies Act defines active faults as those that have experienced surface displacement or movement during the last 11,000 years. The site is located in the seismically active region of Southern California. The site is not in an Alquist-Priolo Earthquake Fault Zone, and the nearest such zone to the site is approximately 7.1 miles to the northeast along the San Jacinto Fault Zone (CGS, 2021). The nearest active fault to the project site is the San Jacinto Fault Zone approximately 7.2 miles to the northeast (CGS, 2021). Project development would not exacerbate hazards from surface rupture of a known active fault, and no impact would occur.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

Response:

Less than Significant Impact
The proposed project is located within a seismically active region, susceptible to collapse of structures, buckling of walls, and damage to foundations from strong seismic ground shaking. The peak horizontal ground acceleration onsite is estimated at 0.62g where g is the acceleration of gravity. Ground acceleration of 0.62g correlates with intensity VIII on the Modified Mercalli Intensity (MMI) Scale (Wald et. al. 1999), a subjective scale of how earthquakes are felt by people and the effects of earthquakes on buildings. The MMI Scale is a 12-point scale where Intensity I earthquakes are generally not felt by people; in Intensity XII earthquakes damage is total, and objects are thrown into the air (USGS 2022). In

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
an intensity VIII earthquake, damage is slight in specially designed structures; considerable damage occurs in ordinary substantial buildings with partial collapse; and damage is great in poorly built structures. Chimneys, factory stacks, columns, monuments, and walls fall, and heavy furniture is overturned (USGS 2022). The project would be constructed in accordance with applicable California Building Code (CBC; California Code of Regulations Title 24 Part 2) regulations used throughout the state. The CBC provides minimum standards to protect property and the public welfare by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions.				

Figure 15 - Alquist-Priolo Fault Zones

Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\GISSVR\gis\Projects\7110_Penske_Truck_Leasing_IS_MND\MXDs\7110_Penske_4_7_Alquist_Priolo_2021_12_08.mxd December 08, 2021

Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community; CA Dept. of Conservation, 2021; UltraSystems Environmental, Inc., 2021

Scale: 1:126,720

N

0 1 2 Miles

0 1 2 Kilometers

Legend

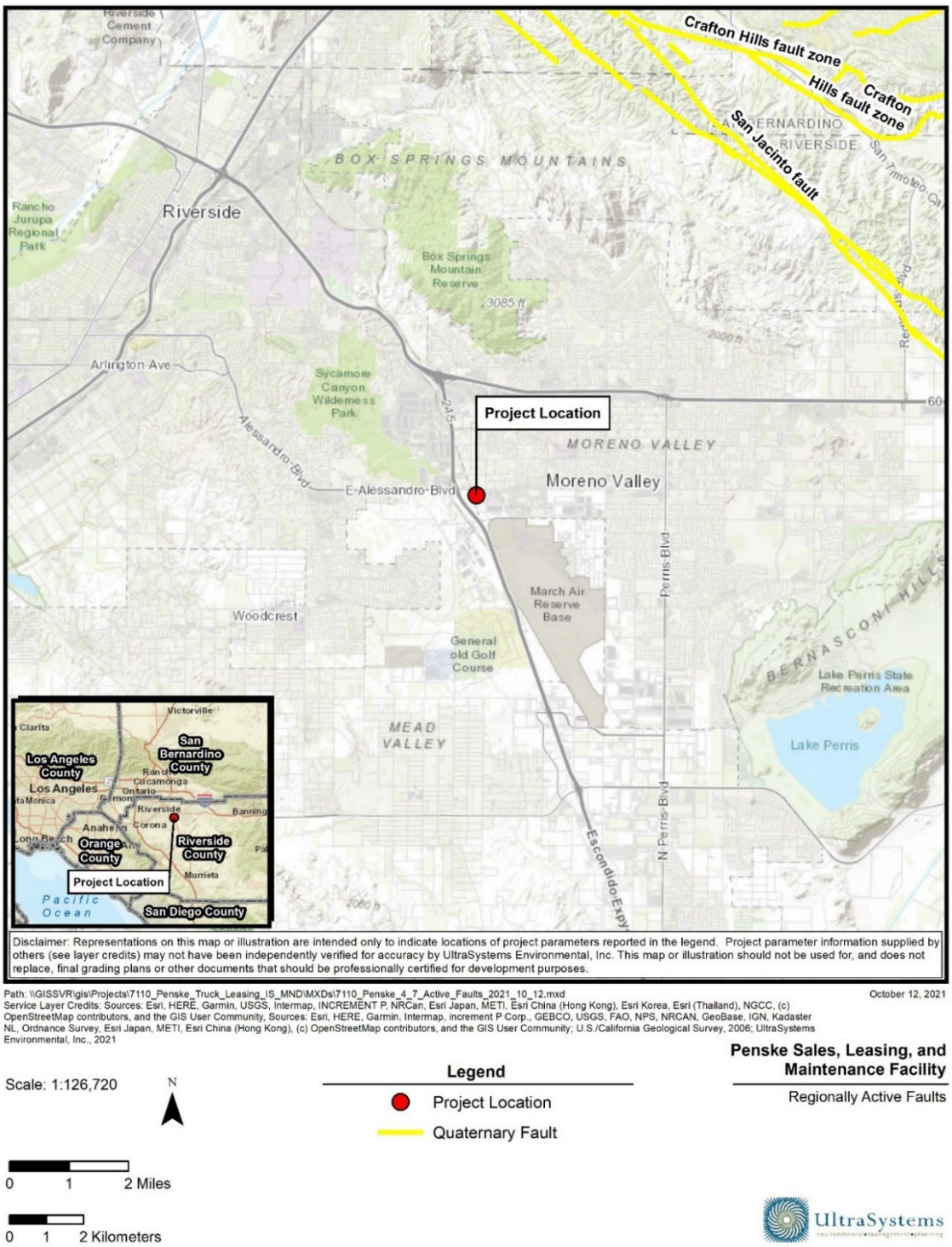
- Project Location
- Alquist Priolo Special Study Zone Boundary
- Alquist Priolo Potentially Active Fault

Penske Sales, Leasing, and Maintenance Facility

Alquist Priolo Earthquake Fault Zones

UltraSystems

Figure 16 - Regionally Active Faults



The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site. A geotechnical investigation report completed for the proposed project in October 2021 contains recommendations for minimizing seismic hazards related to project design and construction; such recommendations must be implemented and the project would comply. Therefore, impacts from strong seismic ground shaking would be less than significant.

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

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

Response:

Less Than Significant Impact
General types of ground failures that might occur as a consequence of severe ground shaking typically include landslides, ground subsidence, ground lurching and shallow ground rupture. The probability of occurrence of each type of ground failure depends on the severity of the earthquake, distance from the faults, topography, subsoils and groundwater conditions, in addition to other factors. Liquefaction typically occurs when saturated or partially saturated soils behave like a liquid, as a result of losses in strength and stiffness in response to an applied stress caused by earthquake shaking or other sudden change in stress conditions.

The geotechnical investigation determined that soils under the project site are not subject to liquefaction (Krazan & Associates, 2021, p. 5). Therefore, impacts arising from liquefaction would be less than significant.

iv) Landslides?	☐	☐	☐	☒

Response:

No Impact
The project site is flat; elevations onsite range from approximately 1,541 feet above mean sea level (amsl) at the northwest corner of the site to 1,549 feet amsl at the southwest corner (Google Earth Pro, 2021). Project development would not exacerbate hazards arising from earthquake-induced landslides, and no impact would occur.

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

Response:

Less Than Significant Impact
Erosion is the movement of soil from place to place and is a natural process. The main natural agents of erosion in the region are wind and flowing water. Erosion can be accelerated dramatically by ground-disturbing activities if effective erosion control measures are not used. Soil can be carried off construction sites or bare land by wind and water and tracked off construction sites by vehicles. Most of the existing site is bare land used for truck parking.

Construction
Project construction would disturb and expose large amounts of soil and thus could cause substantial soil erosion if effective soil erosion measures were not used. Construction projects of one acre or more are regulated under the Statewide General Construction Permit, Order No. 2009-0009-DWQ, issued by the State Water Resources Control Board (SWRCB) in 2009. Projects obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters and specifying Best Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater. Categories of BMPs used in SWPPPs are described below in **Table 16**.

Table 16 - Construction Management Best Practices

Category	Purpose	Examples
Erosion Controls	Consists of using project scheduling and planning to reduce soil or vegetation disturbance (particularly during the rainy season), preventing or reducing erosion potential by diverting or controlling drainage, as well as preparing and stabilizing disturbed soil areas.	Scheduling, preservation of existing vegetation, hydraulic mulch, hydroseeding, soil binders, straw mulch, geotextile and mats, wood mulching, earth dikes and drainage swales, velocity dissipation devices, slope drains, streambank stabilization, compost blankets, soil preparation/roughening, and non-vegetative stabilization

Sediment Controls	Filter out soil particles that have been detached and transported in water.	Silt fence, sediment basin, sediment trap, check dam, fiber rolls, gravel bag berm, street sweeping and vacuuming, sandbag barrier, straw bale barrier, storm drain inlet protection, manufactured linear sediment controls, compost socks and berms, and biofilter bags
Wind Erosion Controls	Consists of applying water or other dust palliatives to prevent or minimize dust nuisance.	Soil binders, chemical dust suppressants, covering stockpiles, permanent vegetation, mulching, watering, synthetic covers, and minimization of disturbed area
Tracking Controls	Minimize the tracking of soil offsite by vehicles	Stabilized construction roadways and construction entrances/exits, and entrance/outlet tire wash.
Non-Storm Water Management Controls	Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance, and fueling of vehicles and equipment. Conduct various construction operations, including paving, grinding, and concrete curing and finishing, in ways that minimize non-stormwater discharges and contamination of any such discharges.	Water conservation practices, temporary stream crossings, clear water diversions, potable and irrigation water management, and the proper management of the following operations: paving and grinding, dewatering, vehicle and equipment cleaning, fueling and maintenance, pile driving, concrete curing, concrete finishing, demolition adjacent to water, material over water, and temporary batch plants.
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Stockpile management, spill prevention and control, solid waste management, hazardous waste management, contaminated soil management, concrete waste management, sanitary/septic waste management, liquid waste management, and management of material delivery storage and use.

Source: CASQA 2012

At project completion 79 percent of the project site would be impervious; the remainder would be landscaped areas vegetated with trees and ground cover. Project development would therefore reduce erosion potential on the project site and no adverse impact would occur.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

Response:

Less than Significant Impact
Impacts related to liquefaction and landslides are discussed above under **Threshold a.**

Lateral Spreading
Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The downslope movement is due to gravity and earthquake shaking combined. The potential for lateral spreading onsite is considered negligible, as site soils are not considered subject to liquefaction (Krazan & Associates, 2021, p. 5).

Collapsible Soils
The top six to 12 inches of soil were found to be very compressible when saturated, and the soil to to three feet deep below that was found to be slightly compressible (Krazan & Associates, 2021, p. 4). The geotechnical investigation report recommends excavating soils within building footprints to four feet

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

below existing grades or three feet below the bottoms of proposed foundations, whichever is greater; and replacing soils with compacted engineered fill. Impacts arising from collapsible soils would be less than significant after implementation of recommendations of the geotechnical investigation report.

Subsidence
The major cause of ground subsidence is the excessive withdrawal of groundwater. The project site is not in an area of land subsidence mapped by the US Geological Survey (USGS, 2021). The Eastern Municipal Water District (EMWD) would provide water to the proposed facility. EMWD water supply in the project region is water imported from northern California; water supplies in the region exclude groundwater (EMWD, 2021). Project development would not increase groundwater pumping and therefore would not exacerbate ground subsidence. Impacts would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐

Response:

Less than Significant Impact
Expansive soils shrink and swell with changes in soil moisture. Soil moisture may change from landscape irrigation, rainfall, and utility leakage. Soils onsite were determined to have low expansion potential (Krazan & Associates, 2021, p. 6).

The geotechnical investigation report (report) recommends excavating soils within building footprints to four feet below existing grades or three feet below the bottoms of proposed foundations, whichever is greater; and replacing soils with compacted engineered fill. The report recommends shallow foundation systems consisting of spread and continuous footings (Krazan & Associates, 2021, p. 11); and recommends that the ground surface slope away from building pads at a minimum five percent slope for 10 feet away from structures or to a drainage conveyance (Krazan & Associates, 2021, p. 10). Impacts arising from expansive soils would be less than significant after implementation of recommendations in the geotechnical investigation report.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

Response:

No Impact
The proposed project would not include septic tanks or alternative waste water disposal systems. For this reason, no impacts associated with septic tanks or alternative waste water disposal systems would occur.

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

Response:

Less than Significant Impact with Mitigation Incorporated
Soils onsite consist of six to 12 inches of silty sand or silty sand/sand over 2 to 3 feet of loose to very dense silty sand or silty sand/sand over loose to very dense silty sand, silty sand/sand, silty sand/sandy silt or sand to the depth explored (Krazan & Associates, 2021, p. 4). Vertebrate fossils known from the region—in the records of the Los Angeles County Natural History Museum—are listed below in **Table 17**. Project development would involve disturbance of soil and sediment for construction of buildings, parking lots, underground storage tanks, and other improvements. Such disturbances could damage fossils that may be present in sediments under the site. This impact would be significant. In the event of an unexpected discovery, implementation of mitigation measure **GEO-1** would ensure paleontological

resources or unique geologic features are not significantly affected. Impacts in this regard would be mitigated to less than significant levels, with implementation of required mitigation measures.

Table 17 - Fossil Localities in the Project Region

Locality No.	Location	Depth	Formation	Taxa
LACM VP 7811	W of Orchard Park, Chino Valley	9-11 feet bgs	Unknown formation (eolian, tan silt; Pleistocene)	Whip snake (Masticophis)
LACM VP 1207	Hill on east side of sewage disposal plant; 1 mile N-NW of Corona	Unknown	Unknown formation (Pleistocene)	Bovidae
LACM VP 1728	W of intersection of English Rd & Peyton Dr, Chino	15-20 ft bgs	Unknown (light brown shale with interbeds of very coarse brown sand; Pleistocene)	Horse (*Equus*), camel (*Camelops*)
LACM VP 7508	Near intersection of Vellano Club Dr. and Palmero Dr., Oakcrest Development; N of Serrano Canyon	Unknown	Unknown formation (Pleistocene)	Ground sloth (*Nothrotheriops*); elephant family (Proboscidea); horse (*Equus*)
LACM VP 7268, 7271	Sundance Condominiums, S of Los Serranos Golf Course	Unknown	Unknown formation (Pleistocene)	Horse (*Equus*)
LACM VP 6059	Overflow area just east-southeast of Lake Elsinore	Unknown	unknown formation (Pleistocene)	Camel family (*Camelidae*)
Source: Los Angeles County Natural History Museum (LACM), 2022				

Mitigation Measure

MM GEO-1 Before the beginning of project ground disturbance, the project applicant shall retain a paleontologist listed on the Riverside County Qualified Paleontologists List to be on-call for the entire duration of ground disturbances. If paleontological resources are uncovered during construction activities, the contractor shall halt construction activities within 50 feet of the discovery and notify the City. The on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). The paleontologist shall identify the discovery to species level, if possible. The fossils shall be offered to an accredited repository for paleontological resources such as the Western Science Center in Hemet or the San Bernardino County Museum. Subsequently, the paleontologist shall remain onsite for the duration of the ground disturbance to ensure the protection of any other resources that may be in the area.

Level of Significance After Mitigation

With implementation of mitigation measure GEO-1 above, potential impacts related to paleontological resources would be less than significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Response:

Background Information on Greenhouse Gas Emissions
Life on earth depends on energy coming from the sun. About half the light reaching Earth's atmosphere passes through the air and clouds to the surface, where it is absorbed and then radiated upward in the form of infrared heat. About 90% of this heat is then absorbed by carbon dioxide (CO_2) and other greenhouse gases (GHG) and radiated back toward the surface, which is warmed to a life supporting average of 59 degrees Fahrenheit (°F) (NASA, 2022).

Human activities are changing the natural greenhouse. Over the last century, the burning of fossil fuels such as coal and oil has increased the concentration of atmospheric CO_2. This happens because the coal or oil burning process combines carbon in the fuel with oxygen in the air to make CO_2. To a lesser extent, the clearing of land for agriculture, industry, and other human activities has increased concentrations of GHGs (NASA, 2022).

GHGs are defined under the California Global Warming Solutions Act of 2006 (AB 32) as CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulfur hexafluoride (SF_6). Associated with each GHG species is a "global warming potential" (GWP), which is a value used to compare the abilities of different GHGs to trap heat in the atmosphere. GWPs are based on the heat absorbing ability of each gas relative to that of CO_2, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years). The GWPs of CH_4 and N_2O are 25 and 298, respectively (GMI, 2023). "Carbon dioxide equivalent" (CO_2e) emissions are calculated by weighting each GHG compound's emissions by its GWP and then summing the products. HFCs, PFCs, and SF_6 would not be emitted in significant amounts by the Penske Sales, Leasing, and Maintenance Facility Project (project) sources, so they are not discussed further.

Carbon Dioxide (CO_2) is a colorless, odorless gas consisting of molecules made up of two oxygen atoms and one carbon atom. It is produced when an organic carbon compound (such as wood) or fossilized organic matter (such as coal, oil, or natural gas) is burned in the presence of oxygen. Since the industrial revolution began in the mid-1700s, industrial activities have increased in scale and distribution. Prior to the industrial revolution, CO_2 concentrations were stable at a range of 275 to 285 parts per million (ppm) (IPCC, 2007). The National Oceanic and Atmospheric Administration's Earth System Research Laboratory indicates that global concentration of CO2 was 414.57 ppm in September 2022 (ESRL, 2022). These concentrations of CO_2 exceed by far the natural range over the last 650,000 years (180 to 300 ppm) as determined from ice cores.

Methane (CH_4) is a colorless, odorless nontoxic gas consisting of molecules made up of four hydrogen atoms and one carbon atom. It is combustible, and is the main constituent of natural gas, a fossil fuel. CH_4 is released when organic matter decomposes in low oxygen environments. Natural sources include wetlands, swamps and marshes, termites, and oceans. Anthropogenic sources include the mining of fossil fuels and transportation of natural gas, digestive processes in ruminant animals such as cattle, rice paddies, and the buried waste in landfills. Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of CH_4. Other anthropogenic sources include fossil fuel combustion and biomass burning.

Nitrous Oxide (N_2O) is a colorless, nonflammable gas with a sweetish odor, commonly known as "laughing gas," and sometimes used as an anesthetic. N_2O is naturally produced in the oceans and in rainforests. Manmade sources of N_2O include the use of fertilizers in agriculture, nylon and nitric acid production, cars with catalytic converters and the burning of organic matter. Concentrations of N_2O also began to rise at the beginning of the industrial revolution.

Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically

unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source, and were first synthesized in 1928. They were used for refrigerants, aerosol propellants, and cleaning solvents. Because of the discovery that they can destroy stratospheric ozone, an ongoing global effort to halt their production was undertaken and has been extremely successful, so much so that levels of the major CFCs are now remaining steady or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years. The project is not expected to emit any CFCs.

Hydrofluorocarbons (HFCs) are synthesized chemicals that are used as a substitute for CFCs. Out of all the GHGs, HFCs are one of three groups with the highest GWP. HFCs are synthesized for applications such as automobile air conditioners and refrigerants. The project is not expected to emit any HFCs.

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface can destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. The two main sources of PFCs are primary aluminum production and semiconductor manufacture. The project is not expected to emit any PFCs.

Sulfur Hexafluoride (SF_6) is an extremely potent greenhouse gas. It is very persistent, with an atmospheric lifetime of more than a thousand years. Thus, a relatively small amount of SF_6 can have a significant long-term impact on global climate change. SF_6 is human-made, and the primary user of SF_6 is the electric power industry. Because of its inertness and dielectric properties, it is the industry's preferred gas for electrical insulation, current interruption, and arc quenching (to prevent fires) in the transmission and distribution of electricity. SF_6 is used extensively in high voltage circuit breakers and switchgear, and in the magnesium metal casting industry. The project is not expected to emit SF_6.

Regulatory Setting

GHGs are regulated at the national, state, and air basin level; each agency has a different degree of control. The United States Environmental Protection Agency (USEPA) regulates at the national level; the California Air Resources Board (ARB) regulates at the state level; and the South Coast Air Quality Management District (SCAQMD) regulates at the air basin level in the Penske Sales, Leasing, and Maintenance Facility project area.

Federal Regulations

The USEPA collects several types of GHG emissions data. These data help policy makers, businesses, and the USEPA track GHG emissions trends and identify opportunities for reducing emissions and increasing efficiency. The USEPA has been maintaining a national inventory of GHG emissions since 1990 and in 2009 established mandatory reporting of GHG emissions from large GHG emissions sources.

The EPA is also achieving GHG reductions through partnerships and initiatives, evaluating policy options, costs, and benefits, advancing the science, partnering internationally and with states, localities, and tribe, and helping communities adapt.

Corporate Average Fuel Economy (CAFE) Standards

In May 2010, the USEPA finalized the first-ever national GHG emissions standards under the Clean Air Act, and the National Highway Traffic Safety Administration (NHTSA) finalized Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. The 2010 CAFE standards were for model year 2012 through 2016 light-duty vehicles (USEPA, 2022). In April 2020, NHTSA and USEPA amended the CAFE and GHG emissions standards for passenger cars and light trucks and established new less stringent standards, covering model years 2021 through 2026 (NHTSA, 2021).

Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule

On September 27, 2019, the USEPA and the NHTSA published the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program (NHTSA, 2020), which revoked California's authority to set its own GHG emissions standards and set zero emission vehicle (ZEV) mandates in California. The loss of the ZEV sales requirements would likely result in additional gasoline-fueled vehicles being sold in the State and criteria pollutant emissions increasing. On April 30, 2020, USEPA

and NHTSA issued the Final SAFE Rule (USEPA, 2023), which relaxed the federal GHG emissions and CAFE standards and would probably have resulted in increased CO_2 emissions. However, this regulation was repealed on December 21, 2021 by the Biden administration (NHTSA, 2022).

State Regulations

Executive Order S 3 05

On June 1, 2005, the governor issued EO S 3 05, which set the following GHG emission reduction targets:

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

To meet these targets, the Climate Action Team (CAT) prepared a report to the Governor in 2006 that contained recommendations and strategies to help ensure that the targets in EO S 3 05 are met.

Assembly Bill 32 (AB 32)

In 2006, the California State Legislature enacted the California Global Warming Solutions Act of 2006, also known as AB 32. AB 32 focuses on reducing GHG emissions in California. GHGs, as defined under AB 32, include CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. AB 32 required that GHGs emitted in California be reduced to 1990 levels by the year 2020. The ARB is the state agency charged with monitoring and regulating sources of emissions of GHGs that cause global warming. AB 32 also required that by January 1, 2008, the ARB determine what the statewide GHG emissions level was in 1990, and it must approve a statewide GHG emissions limit, so it may be applied to the 2020 benchmark. The ARB approved a 1990 GHG emissions level of 427 million metric tons of CO_2e ($MMTCO_2e$), on December 6, 2007, in its Staff Report. Therefore, in 2020, emissions in California were required to be at or below 427 $MMTCO_2e$. Under the "business as usual or (BAU)" scenario established in 2008, statewide emissions were increasing at a rate of approximately one percent per year as noted below. It was estimated that the 2020 estimated BAU of 596 $MMTCO_2e$ would have required a 28 percent reduction to reach the 1990 level of 427 $MMTCO_2e$.

Climate Change Scoping Plan

The first AB 32 Scoping Plan (ARB, 2008) contained the main strategies to achieve the 2020 emissions cap. The plan was developed by the ARB with input from the Climate Action Team and proposed a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the state's economy. The GHG reduction strategies contained in the AB 32 Scoping Plan included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. In May 2014, the ARB adopted the First Update to the AB 32 Scoping Plan (ARB, 2014). This update identified the next steps for California's leadership on climate change. It described progress made to meet the near-term objectives of AB 32 and defined California's climate change priorities and activities for the next several years. It also framed activities and issues facing the state as it develops an integrated framework for achieving both air quality and climate goals in California beyond 2020.

In November 2017, the ARB published the 2017 AB 32 Scoping Plan (ARB, 2017), which built upon the former AB 32 Scoping Plan and Updates by outlining priorities and recommendations for the state to achieve its 2030 GHG target of a 40 percent reduction in GHGs by 2030, compared to 1990 levels. The major elements of the framework proposed were: enhancement of the Renewables Portfolio Standard (RPS) and the Low Carbon Fuel Standard (LCFS); a Mobile Source Strategy, Sustainable Freight Action Plan, Short Lived Climate Pollutant Reduction Strategy, Sustainable Communities Strategies, and a Post 2020 Cap and Trade Program; a 20 percent reduction in GHG emissions from the refinery sector; and an Integrated Natural and Working Lands Action Plan.

In November 2022, the ARB circulated its Final 2022 Scoping Plan Update (ARB, 2022), which adds upon carbon neutrality to the former Scoping Plan. It identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 or earlier. Through the lens of carbon neutrality, the plan

expands the scope to more meaningfully consider how our natural and working lands (NWL) contribute to our long-term climate goal. The draft environmental analysis was recirculated in July 2022.

Renewables Portfolio Standard (Scoping Action E-3)
The California Energy Commission estimates that in 2000 about 12% of California's retail electric load was met with renewable resources. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. California's current RPS is intended to increase that share to 33% by 2020. Increased use of renewables will decrease California's reliance on fossil fuels, thus reducing emissions of GHGs from the electricity sector. Most recently, Governor Brown signed into legislation Senate Bill (SB) 350 in October 2015, which requires retail sellers and publicly-owned utilities to procure 50% of their electricity from eligible renewable energy resources by 2030.

Senate Bill 375 (SB 375)
SB 375 was signed by the governor on September 30, 2008. According to SB 375, the transportation sector is the largest contributor of GHG emissions and is responsible for over 40% of the GHG emissions in California, with automobiles and light trucks alone contributing almost 30%. SB 375 indicates that GHGs from automobiles and light trucks can be reduced by new vehicle technology. However, significant reductions from changed land use patterns and improved transportation also are necessary. SB 375 states, "Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32." SB 375 does the following: (1) requires metropolitan planning organizations to include sustainable community strategies in their regional transportation plans for reducing GHG emissions, (2) aligns planning for transportation and housing, and (3) creates specified incentives for the implementation of the strategies.

Executive Order B-30-15
On April 29, 2015, the Governor issued EO B-30-15, which added an interim target of GHG emissions reductions to help ensure that the state meets its 80% reduction by 2050, as set in EO S-3-05. The interim target is reducing GHG emissions by 40% by 2030. It also directs state agencies to update the Scoping Plan, update the Adaptation Strategy every three years, and take climate change into account in agency planning and investment strategies. Additionally, it requires the state's Five-Year Infrastructure Plan to take current and future climate change impacts into account in all infrastructure projects.

Title 24
Although not originally intended to reduce GHGs, California Code of Regulations Title 24 Part 6: California's Building Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The standards are updated every three years to allow consideration and possible incorporation of new energy efficient technologies and methods. The 2022 Energy Code, adopted August 11, 2021 by the CEC and approved by the California Building Standards Commission in December 2021, applies to all buildings whose permit applications were submitted on or after January 1, 2023.

Local Regulations
City of Moreno Valley's Climate Action Plan

The Moreno Valley Climate Action Plan (CAP) is designed to reinforce the City's commitment to reducing GHG emissions, and to demonstrate how the City will comply with the State of California's GHG emission reduction standards (Dyett & Bhatia, 2021b). 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.
- Monitoring and reporting processes to ensure targets are met.

State-Mandated Local GHG Emissions Targets and Guidelines

The CAP reflects guidelines established in the 2017 Scoping Plan prepared by the ARB. The Scoping Plan, designed to implement the State's not-to-exceed GHG emission targets set in Executive Order S-3-15 and Senate Bill 32, recommends that local governments target six metric tons carbon dioxide equivalent ($MTCO_2e$) per capita per year in 2030 and two $MTCO_2e$ per capita per year in 2050 in their CAPs. The proposed 2040 target of four $MTCO_2e$ per capita per year is determined using a linear trajectory in emissions reduction between 2030 and 2050 (Dyett & Bhatia, 2021b).

The total emissions are projected to increase from 866,410 $MTCO_2e$ per year in 2018 to 1,411,346 $MTCO_2e$ per year in 2040 (an increase of 63 percent). Therefore, the future emissions depicted in **Table 18** present how GHG emissions may increase in Moreno Valley (Dyett & Bhatia, 2021b).

Table 18 - GHG Emissions Forecast and Targets (MTCO2e per year)

Year	GHG Emissions ($MTCO_2e$)	Per Capita Emissions ($MTCO_2e$ per capita)	GHG Emissions Target ($MTCO_2e$ per capita)
2018	866,410	4.17	-
2030	-	-	6.0
2040 BAU	1,411,346	5.50	4.0
2050	-	-	2.0

Source: Dyett & Bhatia, 2021b

Thresholds of Significance

Neither the SCAQMD nor the State CEQA Guidelines Amendments has adopted specific quantitative thresholds of significance for addressing a project's GHG emissions. Nonetheless, § 15064.4 of the CEQA Guidelines serves to assist lead agencies in determining the significance of the impacts of GHGs. As required in § 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of GHG emissions resulting from the project; (2) a qualitative analysis or performance based standards; (3) a quantification of the extent to which the project increases GHG emissions as compared to the existing environmental setting; and (4) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The SCAQMD's guidance on evaluating GHG emissions (SCAQMD, 2008) uses a tiered approach rather than a single numerical emissions threshold. If a project's GHG emissions "fail" the non-significance of a given tier, then one goes to the next one.

The threshold selected for this analysis is "Tier 3," which establishes a screening significance threshold to determine significance using a 90 percent emission capture rate. For Tier 3, the SCAQMD estimated that at a threshold of approximately 3,000 metric tons (tonnes) CO_2e per year, emissions would capture 90% of the GHG emissions from new residential or commercial projects.

Less than Significant Impact

Methodology

GHG emissions would come from both construction and operation of the proposed project. Construction of the project would result in temporary emissions of GHGs from fuel combustion by onsite construction equipment and by onroad vehicle traffic (i.e., worker commute and delivery truck trips). Operational direct GHG emissions would come from onroad mobile sources and onsite area sources, such as landscaping. Indirect GHG emissions would come from energy use, water supply, wastewater, and solid waste.[4] A detailed summary of the assumptions and the model data used to estimate the project's potential GHG emissions is provided in **Appendix B**.

Short-term GHG emissions are those construction emissions that do not recur over the life of the project. The major construction phases included in this analysis are grading, building construction, paving, and architectural coating. Emissions are from offroad construction equipment and onroad travel, such as worker commuting; vendor deliveries; and truck hauling of soil, building materials and construction and demolition waste.

Other GHG emissions would occur continually after buildout. GHGs are emitted from buildings because of activities for which electricity and natural gas are typically used as energy sources. Combustion of carbon-based fuel emits CO_2 and other GHGs directly into the atmosphere; these emissions are

considered direct emissions. The project's primary direct source of annual GHG emissions will be onroad mobile sources. GHGs are also emitted during the generation of electricity from fossil fuels; when produced offsite, these emissions are indirectly associated with the project. Indirect GHG emissions also result from the production of electricity used to convey, treat, and distribute water and wastewater. A final indirect GHG emission source is decomposition of organic waste that is generated by the project and transported to landfills.

GHG emissions from the Penske Sales, Leasing, and Maintenance Facility project's onsite and offsite project construction activities were calculated using CalEEMod, Version 2022.1.1.20 (CAPCOA, 2023), which was described in **Regulatory Setting**. The results of this analysis are presented in **Table 19**. The annual GHG emissions from the project construction activities would be 568 metric tons in 2023 and 41.1 metric tons in 2024. The total construction GHG emissions would be **609.1 metric tons**. Consistent with SCAQMD recommendations and to ensure that construction emissions are assessed in a quantitative sense, construction GHG emissions have been amortized over a 30-year period. The amortized value, **20.3 MTCO$_2$e**, has been added to the project's annual operational GHG emissions. (See below.) Modeling results are in **Appendix B.** For each construction year, annual GHG emissions would be far below the threshold of 3,000 MT of CO_2e per year and therefore would be less than significant. No mitigation is necessary.

Table 19 - Project Construction-Related GHG Emissions

Year/Phase	Annual Emissions (MT)			
	CO_2	CH_4	N_2O	CO_2e
2024	557	0.02	0.03	568
2025	40.9	<0.005	<0.005	41.1
Total	597.9	<0.025	<0.035	609.1

Source: Calculated by UltraSystems with CalEEMod (Version 2022.1.1.20) (CAPCOA, 2023).

Operational GHG Emissions

The operational GHG emissions calculated by CalEEMod Version 2022.1.1.20 (CAPCOA, 2023) are shown in **Table 20**. Total annual unmitigated emissions from the project, including the amortized construction emissions, would be **2,317 MTCO$_2$e per year**. Energy production and mobile sources account for about 98 percent of the annual operating emissions.[5]

Table 20 - Project Operational GHG Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Area Sources	0.52
Energy Demand (Electricity & Natural Gas)	138
Mobile (Motor Vehicles)	2,121

[4] Indirect emission sources are those for which the project is responsible, but which are not located at the project site.

[5] Calculations are provided in **Appendix B**.

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

Solid Waste Generation	30.4
Water Demand	7.21
Construction Emissions[a]	20.3
Total	**2,317.43**

Source: Calculated by UltraSystems with CalEEMod (Version 2022.1.1.20) (CAPCOA, 2023).

[a] Total construction GHG emissions were amortized over 30 years and added to those resulting from the operation of the project.

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

Response:

Less than Significant Impact

The City of Moreno Valley's CAP (Dyett & Bhatia, 2021b) is designed to reinforce the City's commitment to reducing greenhouse gas (GHG) emissions and demonstrate how the City will comply with State of California's GHG emission reduction standards.

The City of Moreno Valley will periodically monitor and report on CAP implementation activities, for example, every five years thereafter. 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 identified in Chapter 1 of the CAP. As was demonstrated in **Land Use and Planning**, the proposed project would have no impacts in relation to consistency with local land use plans, policies, or regulations. Therefore, the project would not hinder the GHG emission reductions of the General Plan Update.

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

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

Response:

The information in this section is based on the Phase I Environmental Site Assessment (ESA) and the Limited Phase II Environmental Site Investigation prepared by GHD and dated July 9, 2021. The purpose of the Phase I ESA portion of this assessment is to identify recognized environmental conditions (REC), as defined in ASTM International (ASTM) Standard E1527-13 (the Standard), at the site. The purpose of the Limited Phase II ESI portion of this assessment is to evaluate the potential environmental concerns identified during the Phase I ESA. The Limited Phase II ESI was conducted under the guidance of a licensed professional geologist from GHD California. A complete copy of this report is included as Appendix F to this Initial Study.

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact

Transportation of hazardous materials/wastes is regulated by California Code of Regulations (CCR) Title 26. The California Highway Patrol (CHP) and the California Department of Transportation (Caltrans) enforce federal and state regulations and respond to hazardous materials transportation emergencies. Emergency responses are coordinated as necessary between federal, state and local governmental authorities and private persons through a State mandated Emergency Response Plan. Due to the significant short-term risks to public health and the environment associated with hazardous waste

management during transportation of wastes, specific Commercial Hazardous Waste Shipping Routes are designated with the intent of minimizing the distance that wastes are transported and the proximity to vulnerable locations.

Construction activities would be temporary and would involve transport, storage, and use of chemical agents, solvents, paints, and other hazardous materials commonly associated with construction activities. Chemical transport, storage, and use would comply with the Resource Conservation and Recovery Act (RCRA); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); Occupational Safety and Health Administration (OSHA); California hazardous waste control law (California Health and Safety Code Sections 25100 et seq.); California Division of Safety and Health (DOSH); South Coast Air Quality Management District (SCAQMD); and Riverside County Department of Environmental Health requirements. Compliance with applicable laws and regulations would ensure that the impacts associated with routine transport, use or disposal of hazardous materials during project construction would be less than significant.

Operation activities of the Penske Leasing Service facility would include the operation of a motor vehicle and truck leasing, rental, and sales business that includes the storage, maintenance, and repair of motor trucks and trailers; outside parking and storage of vehicles; a motor vehicle repair shop; and the storage and dispensing of fuel for internal customers only. The project proposes three underground storage tanks: 1) a 20,000-gallon double-wall diesel tank; 2) a 4,000-gallon double-wall gasoline tank; and 3) a 2,000-gallon double-wall dry interstice diesel exhaust fluid tank. During operations, the project would require routine transport of hazardous materials for maintaining supplies onsite and for disposal of waste offsite. Transportation of hazardous materials can result in accidental spills, leaks, toxic releases, fire, or explosion.

The proposed travel routes for hazardous materials to be delivered or transported from the site would be via Alessandro Boulevard west to I-215. The closest residences to the site are to the north of the project site on the north side of Alessandro Boulevard; therefore, hazardous materials would be transported within proximity of a few existing residences. The proposed routes are primarily surrounded by existing commercial and industrial land uses.

The Office of Hazardous Materials Safety of the United States Department of Transportation (USDOT) prescribes strict regulations for the safe transportation of hazardous materials, as described in Title 49 of the Code of Federal Regulations (CFR) and implemented by Title 13 of the CCR. Appropriate documentation would be provided for all hazardous waste that is transported, as required by existing hazardous materials regulations. Chapter 6.95 of the California Health and Safety Code requires businesses that handle more than a specified amount of hazardous materials onsite to submit a Hazardous Materials Business Plan to firefighters, health officials, planners, public safety officers, health care providers, regulatory agencies, and other interested persons. The business plan must include an inventory of hazardous materials handled, facility floor plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee safety and emergency response training.

The project site is in Compatibility Zone 2B, the High Noise zone, with respect to March Air Reserve Base (MARB) designated by the Riverside County Airport Land Use Commission. Zone 2B is an area of moderate risk from aviation accidents. Outdoor storage of hazardous materials is discouraged in Zone 2B.

The proposed project could create a significant hazard to the public and the environment through routine transport, use, and disposal of hazardous materials. The proposed project is subject to compliance with all applicable federal, state and local laws (including CFR Title 49) and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste. Compliance with these regulations would reduce the likelihood and severity of accidents during transit, thereby ensuring that a less than significant impact would occur.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐

Response:

Less than Significant Impact with Mitigation

GHD completed a Phase I Environmental Site Assessment (ESA) and a Limited Phase II Environmental Site Investigation (ESI) in July 2021 for the project site. The purpose of the ESA and ESI was to identify recognized environmental conditions (REC) for the project site. These include: 1) presence or likely presence of hazardous substances or petroleum products on the site, 2) conditions that indicate an existing release, a past release, or a material threat of a release of hazardous substances or petroleum products into structures, the ground, groundwater, or surface water of the subject property (GHD, 2021, p. 1).

The ESA and ESI identified three RECs that could affect the project site:

- **On-site groundwater and soil vapor impacts**: A former dry cleaner reportedly operated in a building adjoining the site to the northeast in the 1950s or 1960s. Chlorinated volatile organic compounds (VOCs) have been detected in soil, groundwater and soil vapor samples collected during previous investigations in the vicinity of the former dry cleaner on the site and adjoining properties. The analytical results of the Limited Phase II ESI on the Site indicate that perchloroethylene (PCE) and total petroleum hydrocarbon gasoline (TPHg) were detected in groundwater samples, and PCE, chloroform, and benzene were detected in soil vapor samples at concentrations that exceeded environmental screening levels (ESL). The presence of these compounds in groundwater and soil vapor at the site represents a REC (GHD, 2021, p. 23).
- **March Air Reserve Base (March ARB)**: Groundwater contamination originating from March ARB, southwest of the project site, is a REC for the project site. Remediation of the March ARB contamination is ongoing, and the groundwater contamination plumes are generally shrinking. The regional groundwater flow is to the southeast away from the project site (GHD, 2021, p. 23).
- **Historical staining**: extensive areas of stained soil were observed in an ESA in 2003. No staining was observed in the ESA for the proposed project (GHD, 2021, p. 24).
-

Construction

The site has historically had construction-related operations since at least the 1960s. Aerial photographs from 2002 to 2011 depict possible stockpiles, uneven terrain, and topographic lows with pooled liquids, and the Site reconnaissance identified potentially imported fill material with unknown sources throughout the Site, all of which represent a REC as detailed in the Phase II investigation.

Construction phasing would include the following: demolition; undergrounding; rough grading including deeper excavation and shoring; vertical construction; concrete and paving improvements; final grading; and landscaping for the onsite improvements. There will be a net import of approximately 7,130 cubic yards of fill material during project grading. The ESA/ESI determined that three RECs, described above, could affect the site. In order to further minimize potential impacts to those encountering and handling subsurface soils during project construction, mitigation measures **HAZ-1** and **HAZ-2** would be implemented. With the incorporation of mitigation, the short-term impacts of construction associated with hazardous materials would be less than significant.

Mitigation Measures

The following mitigation measures would be adopted to reduce the impacts related to the potential contamination of the soils from previous agricultural land uses on the project site:

MM HAZ-1 During all subsurface construction activities, the project construction contractor shall regularly inspect the exposed soil for visual evidence of contamination or volatilization of contaminants (odors). If visual or odor contamination indicators are identified during construction activities, all work shall stop in the vicinity of the potential contamination, and an investigation shall be designed and performed by a qualified environmental consultant to verify the presence and extent of contamination onsite. Any soil with visual staining and/or odors observed underneath the area shall be sampled. Results of the investigation shall be reviewed and approved by the City of Moreno Valley Building and Safety Division prior to resuming construction activities in the vicinity of the contamination.

MM HAZ-2 If soil testing detects any pesticides or other potentially hazardous materials in the onsite soils at levels determined to be significant based on United States Environmental Protection Agency (USEPA) thresholds, the project applicant shall have all impacted soils either properly treated or disposed of in accordance with applicable requirements. Contaminated soils removed shall be disposed in a landfill that accepts hazardous materials. Contaminated soils shall be transported from the project site by a licensed transporter and disposed of in a licensed storage/treatment facility to prevent contaminated soils from becoming airborne or otherwise released into the environment. A qualified environmental consultant shall be present on the project site during grading and excavation activities in the known or suspected locations of contaminated soils and shall be on call at other times as necessary to monitor the soils and excavations for evidence of contamination.

Level of Significance After Mitigation

After the implementation of the mitigation measures **HAZ-1** and **HAZ-2,** the potential impacts of hazardous material from previous agricultural operations on the project site would be reduced to a less than significant level.

Operation

The proposed project could create a significant hazard to the public or the environment during operation through the accidental release of hazardous materials. Typical incidents that could result in accidental release of hazardous materials include leaking storage tanks; spills during transport; inappropriate storage; inappropriate use; and/or natural disasters. Accidental releases such as these could cause contamination of soil, surface water, groundwater, and toxic fumes. Depending on the nature and extent of the contamination, groundwater supplies may 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.

The storage of hazardous materials in above-ground or underground storage tanks would follow federal and state regulations. Above-ground tanks that store hazardous chemicals would have secondary containment to collect fluids that are accidentally released. Underground storage tanks and connecting piping would be double-walled and would have monitoring devices with alarms installed to continuously monitor unauthorized releases in accordance with federal and state standards.

Applicable existing standards include the Cal/OSHA operational requirements, California Health and Safety Code § 25270.7, and Riverside County Department of Environmental Health regulations regarding the installation and operation of underground tanks. These existing measures would minimize impacts to a less than significant level.

Transportation of hazardous materials can cause accidental spills, leaks, toxic releases, fire, or explosion. The potential exists for licensed vendors to transport hazardous materials to and from the project site. As discussed previously, the proposed project is subject to compliance with all applicable federal, state, and local laws (including Title 49 of the CFR) and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste. Compliance with these regulations would

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
reduce the likelihood and severity of accidents during transit, thereby ensuring that a less than significant impact would occur.				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
Response: **No Impact** No schools are within 0.25 miles of the project site. The closest school to the project site is Garvey/Allen Visual & Performing Arts Academy at 22515 Alessandro Boulevard, approximately 0.65 miles east. Project development would not cause substantial hazards that affect people on a school and no impact would occur.				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
Response: **Less than Significant Impact** A recognized environmental condition (REC) is the presence or likely presence of any hazardous substance or petroleum products in, on, or at a property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The ESA and Limited ESI of the project site identified the following recognized environmental conditions (RECs) potentially affecting the project site. Government Code § 65962.5 requires the Department of Toxic Substances Control (DTSC) to compile and update, at least annually, lists of the following: • Sites for hazardous waste and substances from the DTSC EnviroStor database. • Leaking Underground Storage Tank (LUST) sites by county and fiscal year in the State Water Resources Control Board (SWRCB) GeoTracker database. • Solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside waste management units. • SWRCB Cease and Desist Orders (CDOs) and Cleanup and Abatement Orders (CAOs).[6] • Hazardous waste facilities subject to corrective action pursuant to § 25187.5 of the Health and Safety Code, identified by DTSC.[7] These lists are collectively referred to as the “Cortese List” (CalEPA, 2019). The project site is listed in the EnviroStor database as Alessandro Properties, a voluntary cleanup site. Soil gas and groundwater are contaminated by perchloroethylene (PCE). The site assessment is ongoing, and the case is open (GHD, 2021). Five hazardous material sites within 0.5 miles of the project site are listed in the GeoTracker database; four of the five cases are closed, and one is eligible for closure; see **Table 21**. Two Cortese List sites on and near the project site are mapped in **Figure 17**.				

6 CDOs and CAOs may be issued for discharges of domestic sewage, food processing wastes, or sediment that do not contain hazardous materials.

7 If corrective action is not taken on or before the date specified in a CDO or CAO, or if immediate corrective action is necessary to remedy or prevent an imminent substantial danger to the public health, domestic livestock, wildlife, or the environment, the DTSC may take, or contract for corrective action and recover the cost for a responsible party.

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

None of the hazardous materials offsite sites listed in **Table 21** were considered an REC for the project site by ESA and Limited ESI for the project site (GHD, 2021). The contaminated soil, groundwater, and water vapor onsite are a Voluntary Cleanup Site. The assessment of the site is ongoing under the supervision of the DTSC. Cleanup of the contamination to regulatory action levels is required. Impacts would be less than significant after assessment and cleanup required by the DTSC pursuant to state laws and regulations.

Table 21 - Cortese Sites on and Within 0.5 Miles of the Project Site

Site Name **Address** **Distance and Direction from site**	**Additional information**
EnviroStor	
Onsite	
Alessandro Properties 14044 Old 215 Frontage Road and 21839 & 21921 Alessandro Boulevard Onsite	Voluntary Cleanup site Assessment ongoing Perchloroethylene, a solvent, was detected in soil gas at concentrations up to 613,000 µg/m^3. A seepage pit and clarifier were removed from the site. Case open
GeoTracker	
Within 0.5 mile of the site	
Charlebois Liquors 21840 Alessandro Boulevard North opposite Alessandro Boulevard from site	Leaking underground storage tank (LUST) site gasoline release affected drinking water aquifer Case closed 2013
Flite Chief, Inc. 22144 Alessandro Boulevard 1,360 feet east	LUST site gasoline release affected soil case closed 1993
Gas 4 Less 22144 Alessandro Boulevard 1,360 feet east	LUST site gasoline release affected drinking water aquifer case closed 2019
Arco 6345 2624 Alessandro Boulevard 950 feet west	LUST site gasoline release affected drinking water aquifer eligible for closure 2021
Howard Lee Property 13390 Highway 215 775 feet south	LUST site gasoline release affected soil case closed 1993
Sources: SWRCB, 2021; DTSC, 2021	

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

Response:

Less than Significant Impact

March Air Reserve Base (MARB), approximately 0.4 miles southeast of the project site, is home to several military units and is used for civilian air cargo operations. The project site is in airport compatibility zone B2 (refer to

Figure 18), the High Noise Zone, for MARB. Zone B2 is an area of moderate risk from aviation accidents and high noise impact. Several types of land use are prohibited in zone B2, including schools, day care facilities, libraries, hospitals, congregate care facilities, hotels, motels, and places of assembly; buildings

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
with more than three habitable aboveground floors; noise-sensitive outdoor nonresidential uses; critical facilities; and hazards to flight (RCALUC, 2014). The Riverside County Airport Land Use Plan places several conditions on developments in Zone B2: locate structures maximum distance from runway; sound attenuation as necessary to meet interior noise level criteria; aboveground bulk storage of hazardous materials is discouraged; Airspace review required for objects over 35 feet tall; electromagnetic radiation notification; and dedication and disclosure of avigation easements. Project compliance with these development requirements would ensure that a less than significant impact would occur.				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

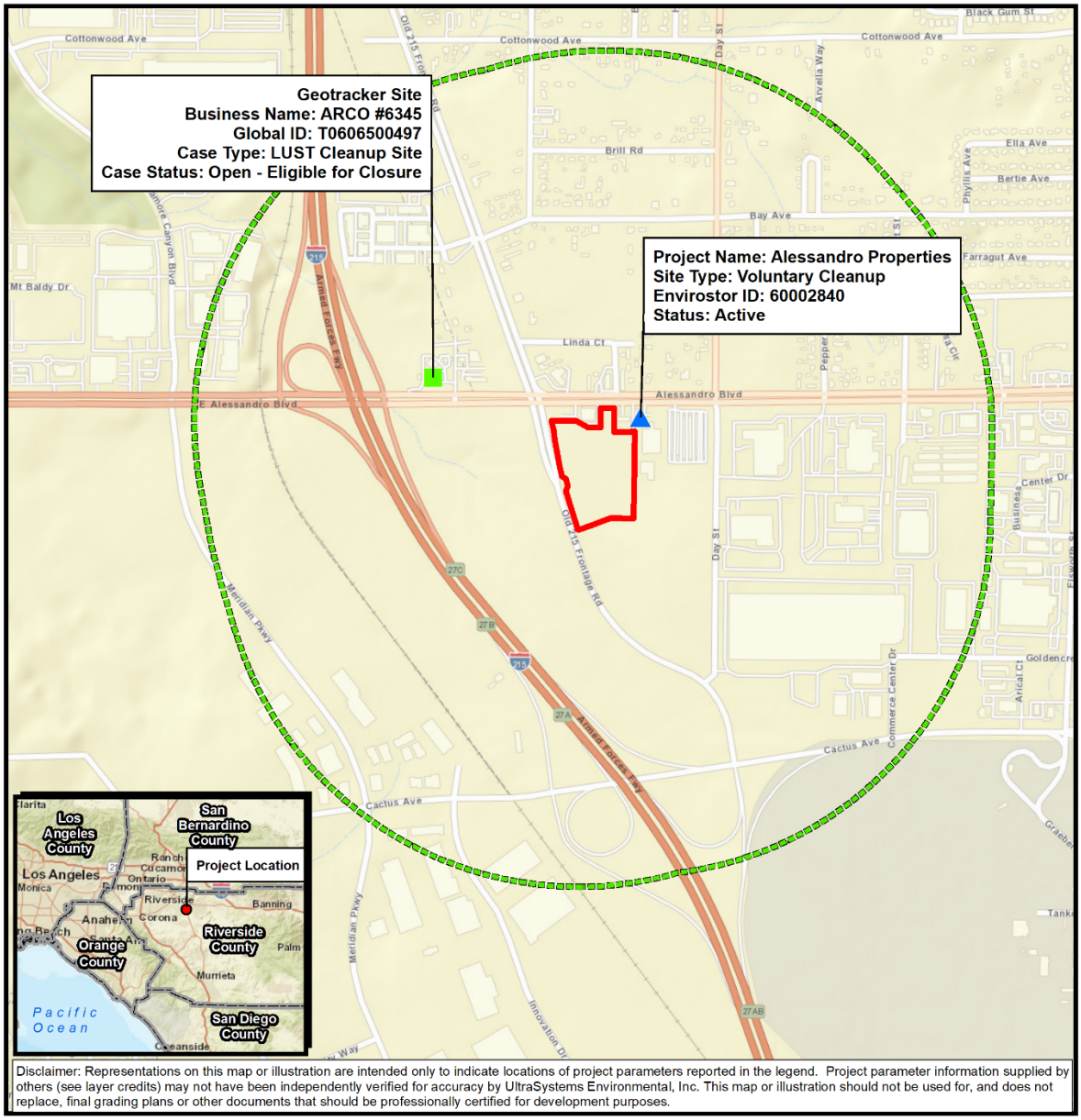
Response:

No Impact

The emergency management plan in effect in the City of Moreno Valley is the City Emergency Operations Plan (EOP) approved in 2019. The EOP identifies city departments that would be involved in emergency responses; response procedures; and threat summaries and assessments. The EOP focuses on large-scale extraordinary emergencies (City of Moreno Valley, 2019). The Moreno Valley Local Hazard Mitigation Plan, approved in 2017, provides additional information on risk assessments and hazard mitigation strategies (City of Moreno Valley, 2017).

The development of the project would not permanently block the traffic lanes on the Alessandro Boulevard or Old 215 Frontage Road. The development of the project would involve the installation of utility laterals connecting to existing mains on Alessandro Boulevard and/or Old 215 Frontage Road. The installation would comply with the construction traffic management requirements of the Moreno Valley Transportation Engineering Division of the City of Moreno Valley. The development of the project would not affect the implementation or interfere with an adopted emergency response or evacuation plan, and no impact would occur.

Figure 17 - Cortese Sites



Path: \\GISSVR\gis\Projects\7110_Penske_Truck_Leasing_IS_MND\MXDs\7110_Penske_4_9_Cortese_2022_02_21.mxd

February 21, 2022

Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; The California Department of Toxic Substances Control (DTSC), February 2022; CA Water Resources Control Board, February 2022; UltraSystems Environmental, Inc., 2022

Scale: 1:12,000

N

0 500 1,000 Feet

0 130 260 Meters

Legend

Project Boundary

Half-Mile Radius

Envirostor Clean Up Site 02-02-2022 Database

DTSC Clean Up List

Case Type (Geotracker Site 02-02-2022 Database)

LUST Cleanup Site

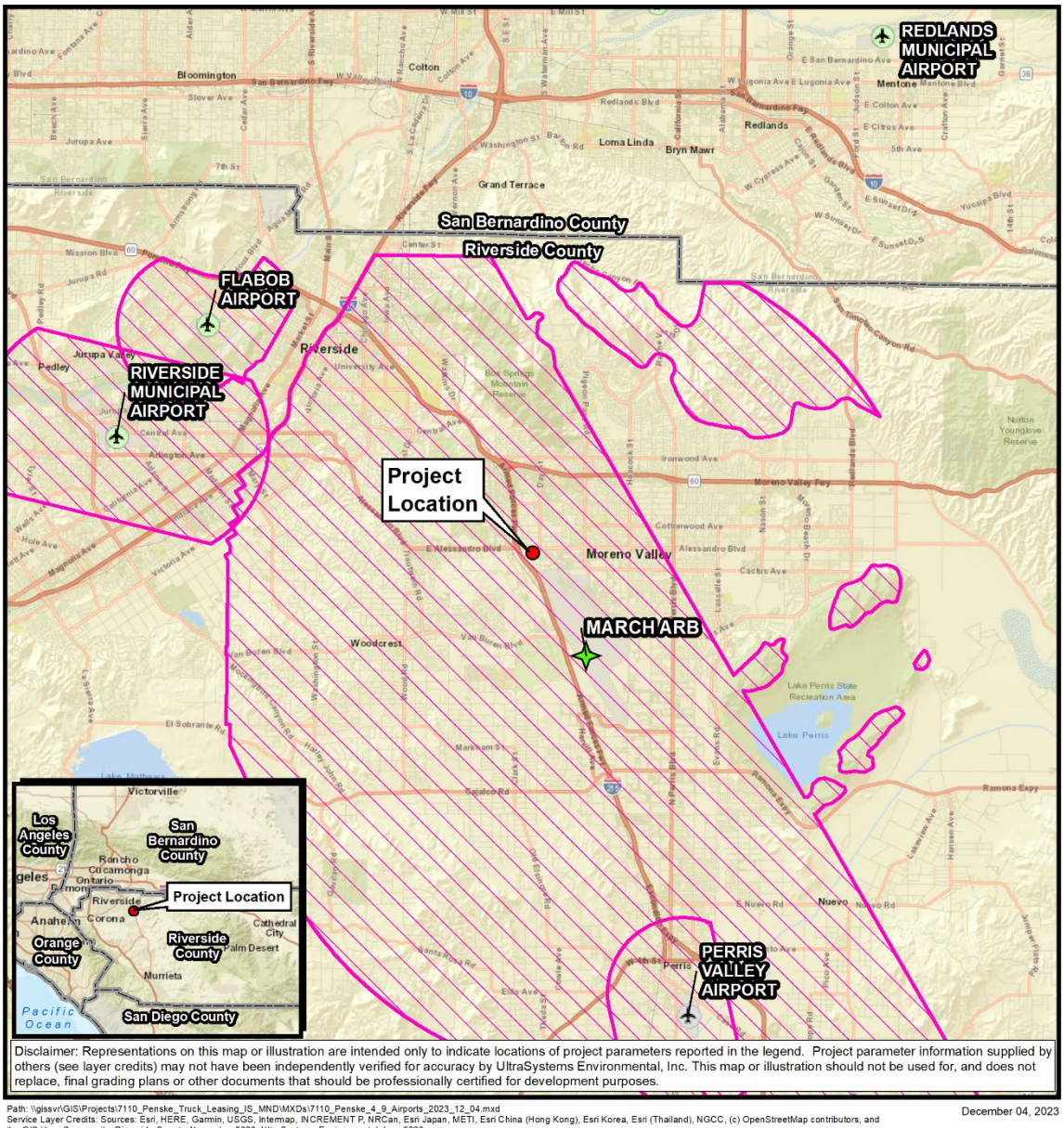
Penske Sales, Leasing, and Maintenance Facility

Cortese Act Sites

UltraSystems environmental • management • planning

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

Figure 18 - Airport Influence Area



g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

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

Response:

No Impact

The project site is not in a fire hazard severity zone (FHSZ) mapped by the California Department of Forestry and Fire Protection. The nearest FHSZ to the site is a Very High Fire Hazard Severity Zone approximately 2.2 miles to the north (CAL FIRE, 2021). The project site is mostly bare land and is used for truck parking; and is in an urbanized area. The development of the project would not expose people or structures to substantial risks arising from wildfires and the impacts would be less than significant. Wildfire hazards are further addressed in the *Wildfire* section of this Initial Study.

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

Response:

The information in this section is based on the following technical studies:

Project Specific Water Quality Management Plan, Penske Moreno Valley. Prepared by Kimley-Horn and Associates; dated November 10, 2021. A complete copy of this report is included in **Appendix H1** to this Initial Study.

Preliminary Hydrology Report, Penske Moreno Valley. Prepared by Kimley Horn; dated November 2021. A complete copy of this report is included as **Appendix H2** to this Initial Study.

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact

The project site is currently vacant. The project site is located in the San Jacinto Groundwater Basin (DWR, 2021) and no existing streams or rivers are located within or adjacent to the site (Refer to **Figure 19** and **Figure 20**). Under existing conditions, stormwater runoff from the project site ponds onsite and sheet flows to the northwest and offsite to catch basins near the intersection of Alessandro Boulevard and Old 215 Frontage Road. A 24-inch reinforced concrete pipe (RCP) storm drain extends from the west site boundary west across Old 215 Frontage Road and discharges into developed land uses opposite the roadway from the project site. Runoff from the project site does not enter that storm drain (See Appendix H2, Pg 2). The site is used for parking of truck trailers. The site is listed on the EnviroStor database as a voluntary cleanup site (see Hazards and Hazardous Materials Section of this IS/MND for further information).

The proposed project would include:

- Used truck sales;
- Local one-way rentals to the public and to light industry customers;
- Full-service lease or contract maintenance to contractual customers; and
- Maintenance, fueling, and washing of Penske fleet vehicles.
- Maintenance activities would involve truck and trailer repairs such as oil changes, belt and bulb replacement, tune-ups, clutch repairs, tire changes, etc. Major engine repairs or body repairs would not be conducted on the proposed project site.

Based on expected construction and operation activities, expected project-related stormwater pollutants could include:

Pathogens (e.g., viruses, indicator bacteria): Bacteria and viruses are common contaminants of stormwater. For separate storm drain systems, sources of these contaminants include animal excrement and sanitary sewer overflow. High levels of indicator bacteria in stormwater have led to the closure of beaches, lakes and rivers to contact recreation such as swimming (CASQA, 2003b).

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

Nutrients (e.g., phosphorus and nitrogen): Nutrients including nitrogen and phosphorous are the major plant nutrients used in fertilizers, and are often found in stormwater. These nutrients can result in excessive or accelerated growth of vegetation, such as algae, resulting in impaired use of water in lakes and other sources of water supply (CASQA, 2003b).

Sediment (causes sediment toxicity, sedimentation, and siltation): Sediment is a common component of stormwater, and can be detrimental to aquatic life (e.g., aquatic plants and algae, invertebrates living on lakebeds and streambeds, and fish) by interfering with photosynthesis, respiration, growth, reproduction and oxygen exchange. Sediment can also transport pollutants that are attached to it, including nutrients and trace metals.

Figure 19 - Surface Water and Watershed

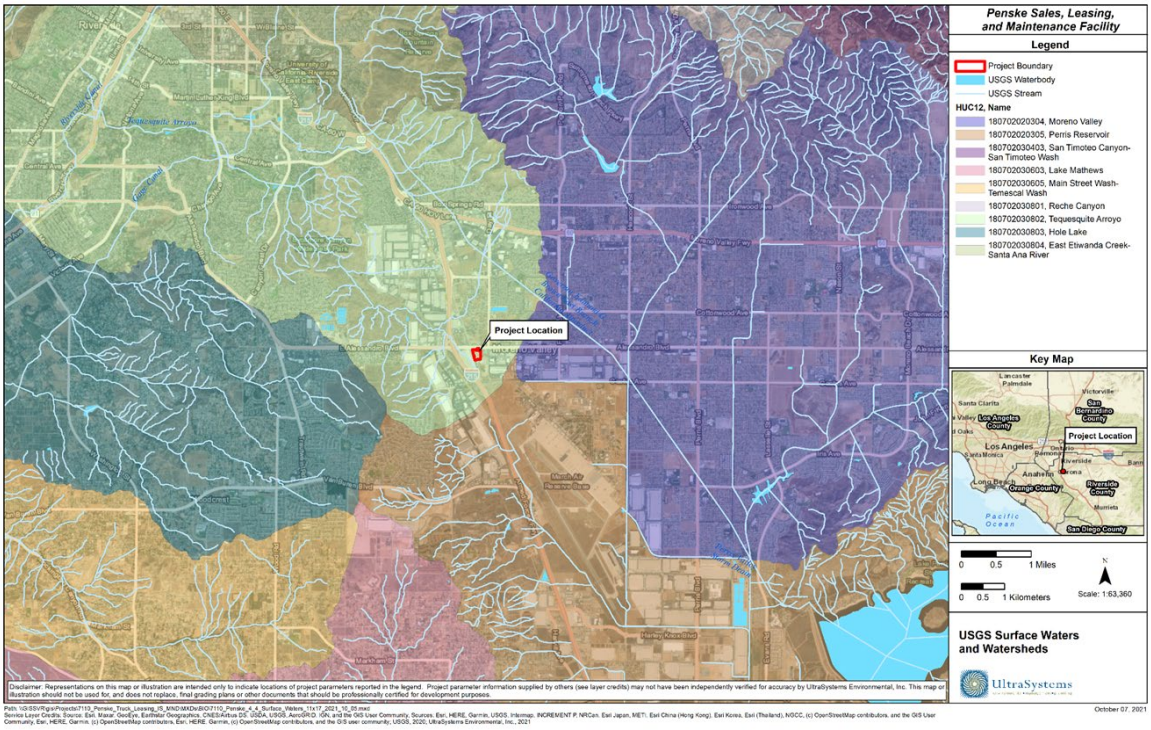
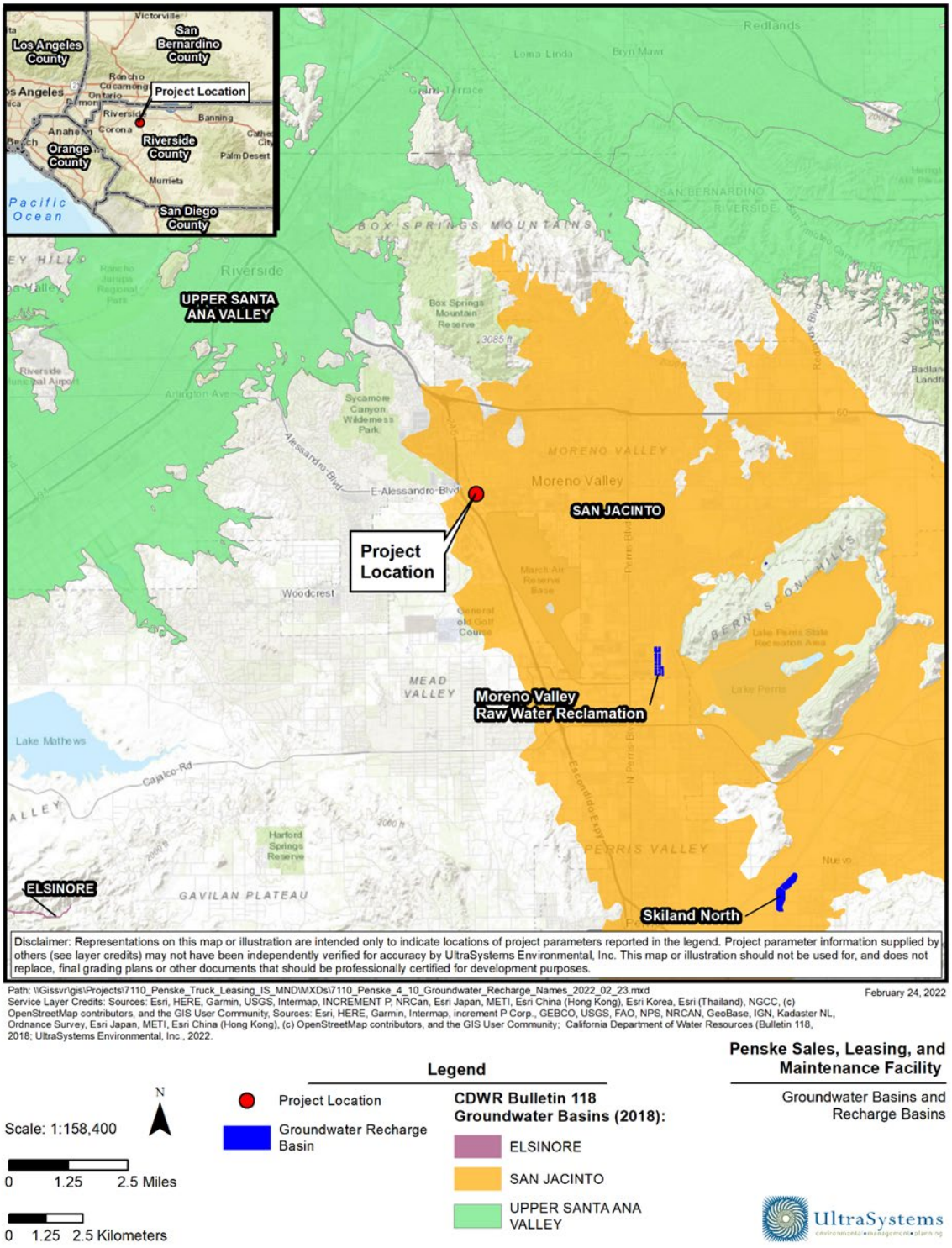


Figure 20 - Groundwater Basins



hydrocarbons. Sediment is the primary component of total suspended solids (TSS) and turbidity (cloudiness), which are common water quality analytical parameters. Sediment and turbidity in the water column can lead to increased water temperatures, which in turn depresses the amount of dissolved oxygen that water can hold, causing stress to or death of aquatic animals (CASQA, 2003b).

Metals: (e.g., metals including lead and copper): Metals including lead, zinc, cadmium, copper, chromium and nickel are commonly found in stormwater. Many of the artificial surfaces of the urban

environment (e.g., galvanized metal, paint, automobiles or preserved wood) contain metals, which enter stormwater as the surfaces corrode, flake, dissolve, decay or leach. Over half the trace metal load carried in stormwater is associated with sediments. Metals are toxic to aquatic organisms, can accumulate to toxic levels in aquatic animals such as fish, and can contaminate drinking water supplies (CASQA, 2003b).

Oil, grease and hydrocarbons: Oil, grease and hydrocarbons include a wide array of hydrocarbon compounds, some of which are toxic to aquatic organisms at low concentrations. Sources of oil, grease and hydrocarbons include leakage, spills, cleaning and sloughing associated with vehicle and equipment engines and suspensions, leaking and breaks in hydraulic systems, and waste oil disposal (CASQA, 2003b).

Trash and Debris: trash and debris may introduce heavy metals, pesticides and bacteria in stormwater. Typically resulting from an urban environment, industrial sites and construction sites, trash and floatables may create an aesthetic “eye sore” in waterways. Gross pollutants also include plant debris (such as leaves and lawn clippings from landscape maintenance), animal excrement, street litter and other organic matter. Such debris may harbor bacteria, viruses and other vectors, and depress the dissolved oxygen levels in streams, lakes and estuaries, sometimes killing fish (CASQA, 2003b).

Pesticides and herbicides (e.g., chlordane, DDT): Pesticides and herbicides (including fungicides, rodenticides and insecticides) have been repeatedly detected in stormwater at toxic levels, even when pesticides have been applied in accordance with label instructions. As pesticide use has increased, so too have their presence in stormwater. Accumulation of these compounds in simple aquatic organisms, such as plankton, provides an avenue for biomagnification through the food web, potentially resulting in elevated levels of toxins in organisms that feed on them, such as fish, birds and humans (CASQA, 2003b).

Organic compounds: Organic compounds may be found in stormwater in low concentrations. Synthetic organic compounds (e.g., adhesives, cleaners, sealants, solvents, etc.) are widely applied and may be improperly stored and disposed of. In addition, deliberate dumping of these chemicals into storm drains and inlets causes environmental harm to waterways (CASQA, 2003b). In freshwater aquatic species, exposure to organic compounds has been shown to result in offspring deformation and mortality, and to generally affect rates of survival, onset of puberty, male/female sex ratios and body weight (Harmon and Wiley, 2010).

Development of the proposed project may result in two types of water quality impacts: (1) short-term impacts due to construction-related discharges; and (2) long-term impacts from operation or changes in site runoff characteristics.

Construction Pollutants Control
Construction projects typically expose soil to erosion and may temporarily alter drainage patterns. Stormwater runoff during construction may contain soil amendments such as fertilizers and pesticides, entrained soil, trash, waste oil, paints, solvents, and other substances used during construction.

The project owner would be required by the California State Water Resources Control Board (SWRCB) to obtain coverage under a General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit; Order 2009-0009-DWQ) for projects which will disturb one or more acres of soil during construction. The Construction General Permit requires potential dischargers of pollutants into waters of the United States (WOUS) to prepare a site-specific Stormwater Pollution Prevention Plan (SWPPP), which establishes enforceable limits on discharges, requires effluent monitoring, designates reporting requirements, and requires construction Best Management Practices (BMPs) to reduce or eliminate point and non-point source discharges of pollutants.

The project would be required to obtain coverage under the Construction General Permit through preparation and implementation of a SWPPP; additionally, BMPs must be maintained, inspected before and after each precipitation event, and repaired or replaced as necessary. Because the project is required by the SWRCB to comply with all applicable conditions of Construction General Permit Order

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

2009-0009-DWQ, construction impacts on water quality standards or waste discharge requirements would be less than significant.

Operational Pollutant Controls
The Riverside County Municipal Stormwater Permit, Santa Ana Regional Water Quality Control Board Order No. R8-2010-0033 regulates the discharge of pollutants into WOUS through stormwater and urban runoff conveyance systems, including flood control facilities. These conveyance systems are commonly referred to as municipal separate storm sewer systems (MS4s), or storm drains; thus, the municipal stormwater permit is also known as the MS4 Permit.

Pursuant to the MS4 Permit, Principal Permittees, including the Riverside County Flood Control and Water Conservation District and Co-Permittees (the City of Moreno Valley is a Co-Permittee) must regulate discharges of pollutants in urban runoff from human-caused sources into storm water conveyance systems within their jurisdiction.

The WQMP specifies modular wetland systems (MWS) as the low-impact development (LID) bioretention and biotreatment BMP for the proposed project (Kimley Horn, 2021a). LID uses site design and stormwater management to maintain the site's predevelopment runoff rates and volumes. The goal of LID is to mimic a site's predevelopment hydrology by using techniques that infiltrate, filter, store, evaporate, and detain runoff close to the source of rainfall (RCFCWCD, 2011). One MWS would be installed in the northwest quadrant of the site and the other two in the south-central part of the site (Kimley Horn, 2021). MWS consist of: a pretreatment chamber containing filtration cartridges; a horizontal flow biofiltration chamber with an underdrain; and a discharge chamber with outlet. The biofiltration chamber contains sorptive media and plant establishment media. MWS remove 80% of total suspended solids and 90% of hydrocarbons.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

Response:

<u>Less Than Significant Impact</u>
The Eastern Municipal Water District (EMWD) supplies water to the project site. EMWD water supply in the project region is from northern California imported via the State Water Project (EMWD, 2020). The project site is mostly bare land and is used for truck storage; the site is not used for intentional groundwater recharge. The project site is over the San Jacinto Groundwater Basin (DWR, 2021). At project completion the project site would be approximately 83% impervious.

Roof drains and site drainage will be routed to adjacent landscaping to the maximum extent possible. The project WQMP assessed infiltration BMPs and found that infiltration is infeasible due to infiltration rates of less than 1.6 inches per hour (refer to Appendices H1 and H2). Project development would not substantially decrease groundwater supplies or interfere with groundwater recharge or with sustainable groundwater management. Impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
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	☐	☐	☒	☐

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
stormwater drainage systems or provide substantial additional sources of polluted runoff?				

Response:

Less Than Significant Impact

The existing drainage pattern onsite is surface flow to the northwest. Runoff leaves the site and enters catch basins near the intersection of Old 215 Frontage Road and Alessandro Boulevard. Runoff from east and northeast of the project site flows onto the site and flows across the site, exiting the site as described. The catch basins are parts of a network of storm drains that discharges to the San Jacinto River. A 24-inch RCP storm drain extends from the west site boundary west across Old 215 Frontage Road and discharges into developed land uses opposite the roadway from the project site. Runoff from the project site does not enter that storm drain.

At project completion, runoff from the site would enter proposed storm drains that discharge to three proposed MWS, one in the northwest quadrant of the site and the other two in the south-central part of the site (refer to Appendix H2). The three MWS would treat the design capture volumes totaling approximately 1.48 cubic feet per second (cfs). Stormwater flows exceeding that rate would bypass the MWS. After passing through the MWS, runoff would be conveyed into a proposed underground detention system in the west-central part of the site. The detention system would consist of 60-inch plastic pipes and have total capacity of 49,401 cubic feet. The required retention volume was governed by the 100-year, 24-hour storm (i.e., the 24-hour storm with an average recurrence interval of 100 years). Drainage flow rates from 100-year, 24-hour storms in existing and post-project conditions are shown below in **Table 22**.

Table 22 - Estimated Stormwater Flows

	Flow rate from 100-year, 24-hour storm (Q100) (cubic feet per second)
Existing conditions	18.07
Post-Project conditions	24.46

[1] Source: Preliminary Hydrology Report, Penske Moreno Valley. Prepared by Kimley Horn; dated November 2021 (Refer to Appendix H2).

The detention system would outlet into a proposed pump that would pump stormwater up to the existing 24-inch storm drain onsite. The detention system would limit post-project runoff flow rates from the site to no greater than existing rates. Runoff discharged offsite from a 100-year, 24-hour storm in post-project conditions would not cause significant adverse impacts on downstream drainage systems (Refer to **Appendix H2**).

Project development would not cause significant adverse impacts on erosion or siltation on- or offsite, flooding on- or offsite, or to the capacity of existing or proposed drainage systems. Impacts would be less than significant.

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

Response:

No Impact

The project site is in flood hazard zone X, that is, outside of 100-year and 500-year flood zones (FEMA, 2021). Project development would not impede or redirect flood flows, and no impact would occur.

No Impact The project site is in flood hazard zone X, that is, outside of 100-year and 500-year flood zones (FEMA, 2021). Project development would not				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
impede or redirect flood flows, and no impact would occur.				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

Response:

No Impact

The project site is in flood hazard zone X, that is, outside of 100-year and 500-year flood zones (FEMA, 2021). Project development would not cause risk of release of pollutants due to flooding in a 100-year flood zone.

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. The project site is not in any dam inundation areas mapped by the Department of Water Resources (DWR, 2022). No water bodies are upgrade from the project site that could pose a flood hazard to the site due to a seiche.

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The project site is approximately 39 miles inland from the Pacific Ocean and is at an elevation ranging from about 1,541 to 1,547 feet above mean sea level. Therefore, it is not at risk of flooding due to tsunami. No impact would occur.

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

Response:

No Impact

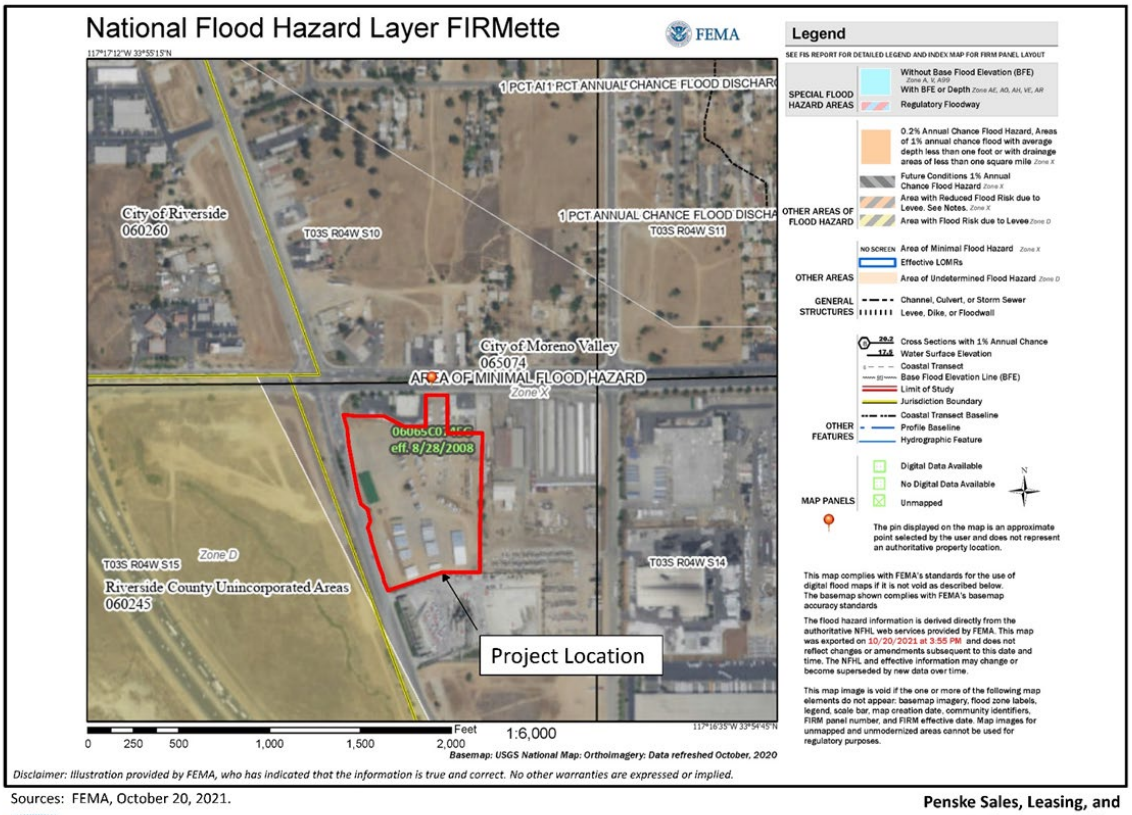
The project site is in flood hazard zone X, that is, outside of 100-year and 500-year flood zones (FEMA, 2021). Project development would not cause risk of release of pollutants due to flooding in a 100-year flood zone.

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. The project site is not in any dam inundation areas mapped by the Department of Water Resources (DWR, 2022). No water bodies are upgrade from the project site that could pose a flood hazard to the site due to a seiche.

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The project site is approximately 39 miles inland from the Pacific Ocean and is at an elevation ranging from about 1,541 to 1,547 feet above mean sea level. Therefore, it is not at risk of flooding due to tsunami. No impact would occur.

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

Figure 21 - FEMA FIRM Map Panel



Sources: FEMA, October 20, 2021.

UltraSystems

Penske Sales, Leasing, and Maintenance Facility

FEMA FIRM Map

XI. LAND USE AND PLANNING – Would the project:

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

Response:

No Impact

The project site is currently vacant and undeveloped and is surrounded by commercial and industrial uses to the east; industrial uses to the south; industrial uses opposite Old 215 Frontage Road to the west; and commercial uses opposite Alessandro Boulevard to the north. The entire site is fenced and is not used for the passage between nearby land uses. Therefore, the development of the project would not divide an established community and no impact would occur.

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

Response:

No Impact

The City of Moreno Valley General Plan land use designation for the project site is Business Park / Light Industrial, as shown in **Figure 22** below, which allows for manufacturing, research and development, warehousing, and distribution uses, as well as commercial and office activities, with a floor area ratio not exceeding 1.0. The zoning district for the proposed site is Business Park (BP), which allows light industrial, research and development, office-based firms, and limited supportive commercial uses.

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

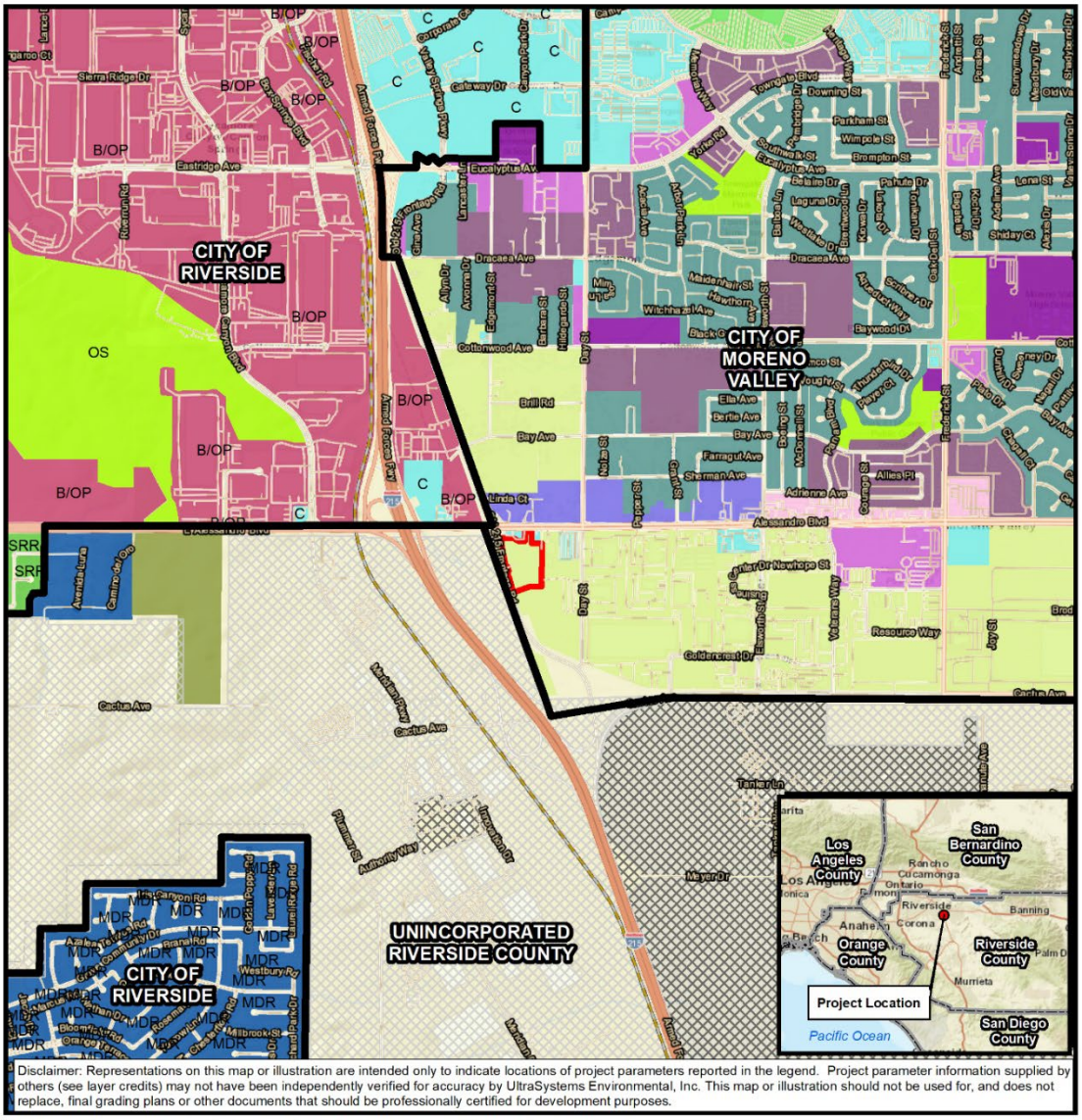
The purpose of this project is to develop the premises for the operation of a commercial vehicle and truck leasing, rental, and sales business. This includes the provision of housing, maintenance, and repair services for trucks and trailers, as well as outdoor parking and storage facilities for these vehicles. Additionally, the premises will house a motor vehicle repair shop and a fuel storage and dispensing facility, exclusively for internal use.

The facility will primarily serve four essential functions. First, it will facilitate the sale of used trucks to customers. Second, it will offer one-way local rentals to the general public and the logistics industry. Third, it will provide full-service leasing and maintenance to contractual customers. Lastly, the facility will be responsible for the maintenance, fueling, and washing of the company's fleet vehicles.

Based on the description within the Moreno Valley Municipal Code, Chapter 9.05, Industrial Districts; the main purpose of the Business Park District is to provide light industrial, research and development, office firms, and limited commercial support uses in an attractive and pleasant working environment in a prestigious location. The district is intended to provide a transition between residential and other sensitive uses and more intense industrial and warehouse uses.

The project’s primary use of motor vehicle and truck rental is permitted; nonretail fueling is permitted; and sales and maintenance services are allowed as accessory / incident uses. Therefore, the development of the project would not have a significant environmental impact due to a conflict with any land use plan, policy, or regulation, and no impact would occur.

Figure 22 - Proposed Project Site Current General Plan Land Use Designations



Path: \\gissvr\GIS\Projects\7110_Penske_Truck_Leasing_IS_MND\MXDs\7110_Penske_2_0_GP_LandUse_2023_03_06.mxd March 06, 2023

Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors; Riverside County, 2021; Riverside City, 2019; Moreno Valley, 2023; GeoData.gov, 2011; UltraSystems Environmental, Inc., 2023

Penske Sales, Leasing, and Maintenance Facility

General Plan Land Use Designation

Scale: 1:24,000

N

0 1,000 2,000 Feet

0 250 500 Meters

Legend

City Boundary
Project Boundary

Military Installations
March AFB
March ARB

Moreno Valley Land Use
Business Flex
Center Mixed Use
Commercial
Corridor Mixed Use
Industrial/Business Park
Multi-family
Office
Open Space/Park
Public Facilities
Suburban Residential

Riverside City Land Use
Business/Office Park
Commercial
Medium Density Residential
Open Space/Natural Resources
Semi Rural Residential

Riverside County Land Use
Light Industrial
Medium Density Residential

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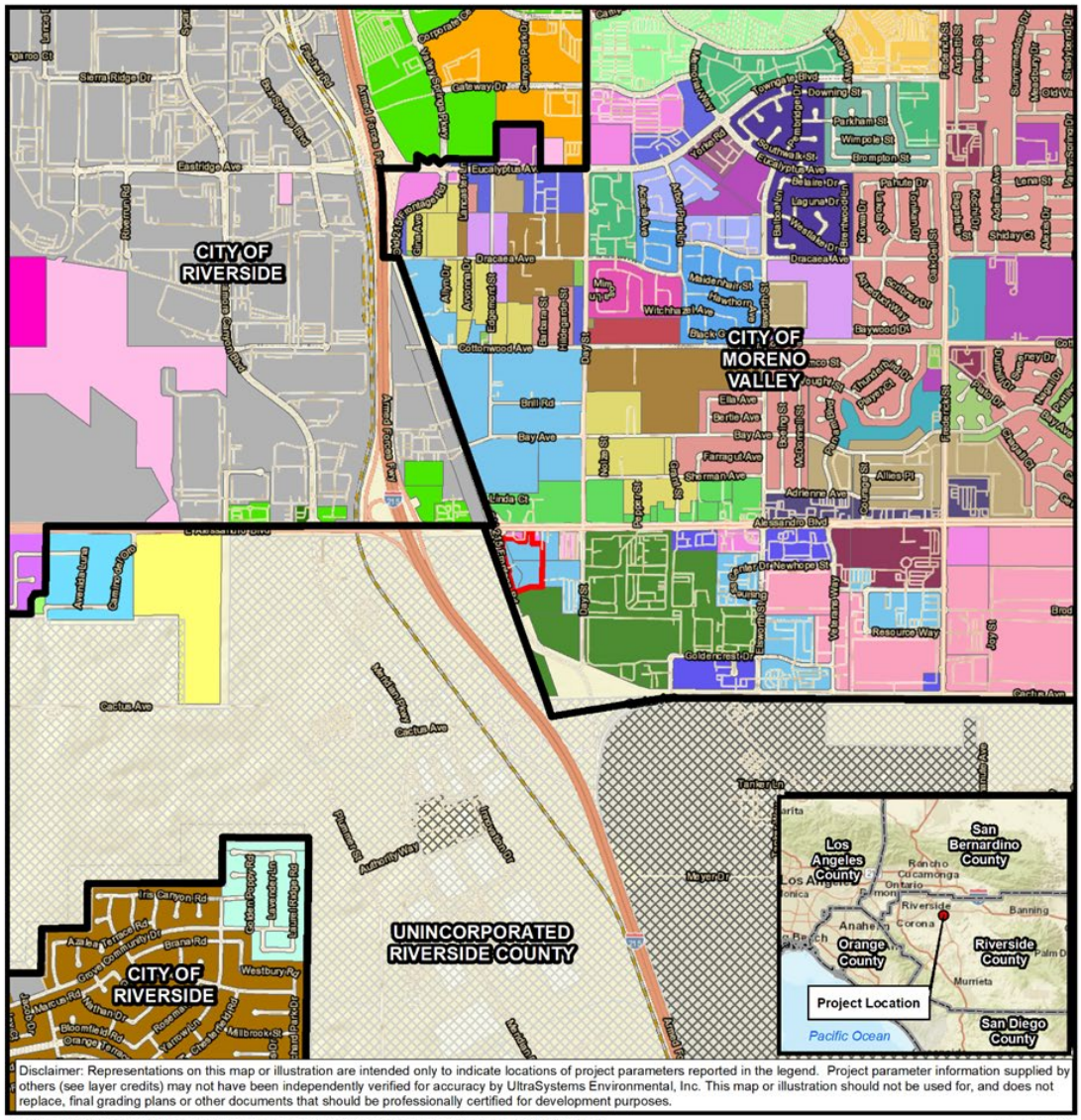
ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Figure 23 - Proposed Project Site Current Zoning Designation



XII. MINERAL RESOURCES – Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☒	☐

Response for XII. a) and b):

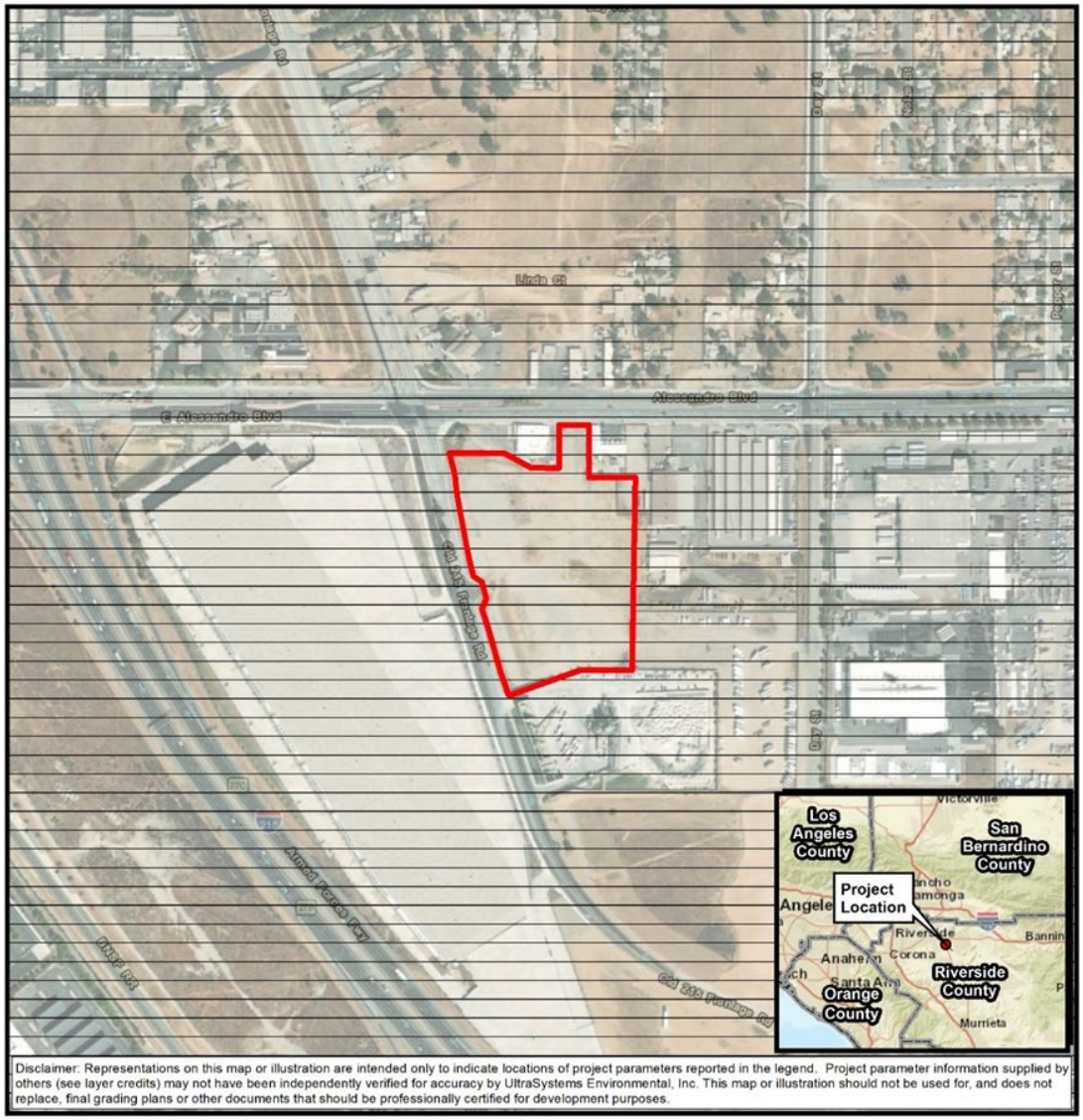
Less Than Significant Impact

The California Geological Survey (CGS) classifies regional mineral resources' significance in accordance with the California Surface Mining and Reclamation Act (SMARA). Most of the City of Moreno Valley is located within Mineral Resource Zone 3 (MRZ-3), which is defined as areas containing mineral deposits, the significance of which cannot be evaluated with available data. Figure 24 below shows a mineral resources zone map of the project site and surroundings. According to the Moreno Valley General Plan, the city and Sphere of Influence do not contain significant mineral resources; only one active sand and gravel quarry, the Jack Rabbit Canyon Quarry, is present within the general plan area. According to the "Well Finder" generated by the California Department of Conservation Division of Oil, Gas, & Geothermal Resources, as shown in

Figure 25, the project site is not located near (within one mile of) any oil or gas wells (DOC, 2022b).

Figure 26 shows there are no geothermal wells in the vicinity of the project (CalGEM, 2021). Therefore, the proposed project would not result in the loss of availability of known mineral resources that would be of value to the region or State. No impact would occur.

Figure 24 - Mineral Resources



Path: \\GISSVR\gis\Projects\7110_Penske_Truck_Leasing_IS_MND\MXDs\7110_Penske_4_12_Mineral_Resources_2021_10_20.mxd
October 20, 2021

Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors; CA Dept. of Conservation, 2008; UltraSystems Environmental, Inc., 2021

Scale: 1:5,400

N

0 450 Feet

0 100 Meters

Legend

Project Boundary

Mineral Resource Zone (MRZ):

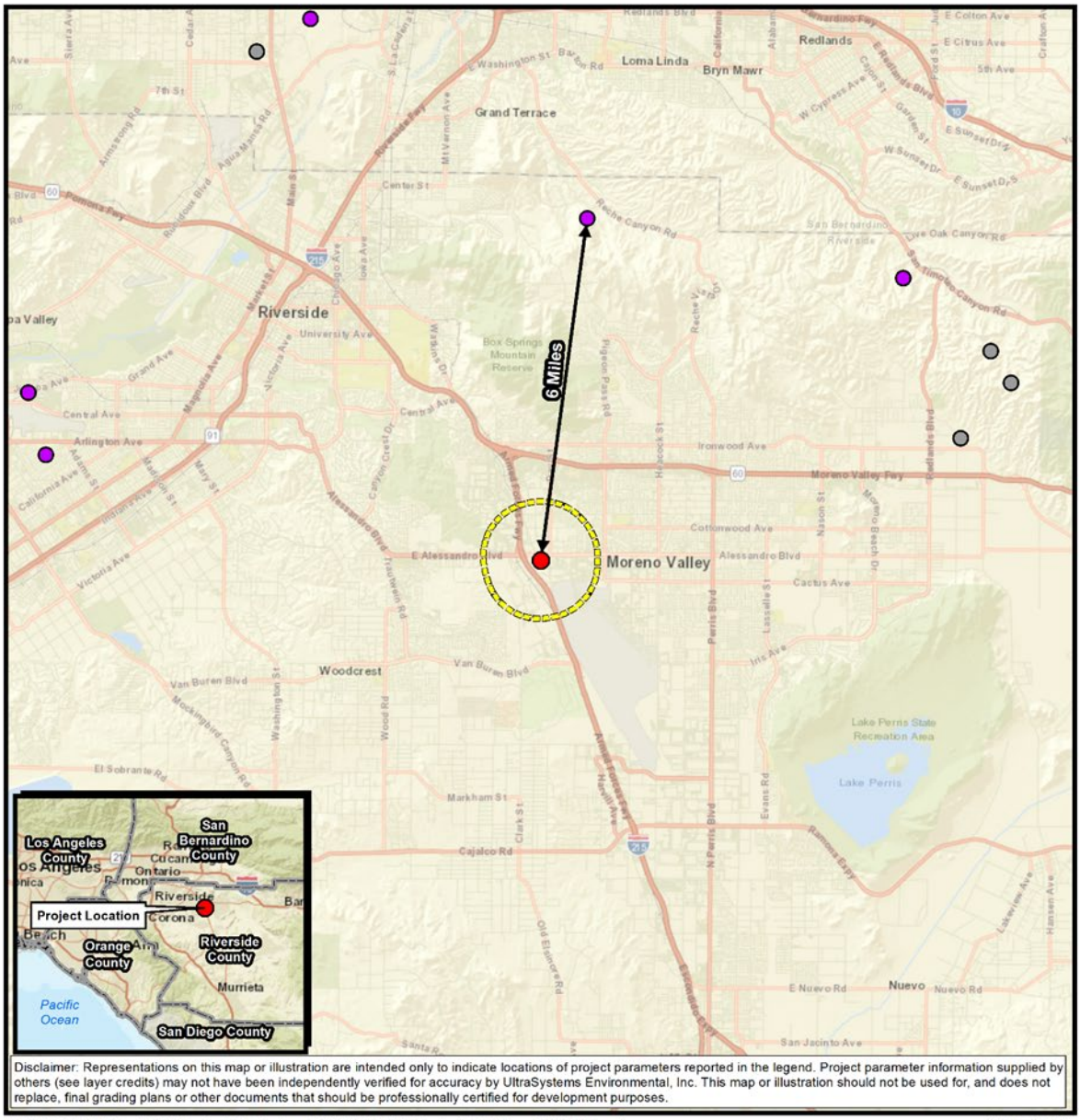
MRZ-3

Penske Sales, Leasing, and Maintenance Facility

Designated Mineral Resource Zones

UltraSystems

Figure 25 - Oil and Gas Wells



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\GISSVR\gis\Projects\7110_Penske_Truck_Leasing_IS_MND\MXDs\7110_Penske_4_9_Oil&Gas_2021_10_12.mxd October 12, 2021
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; CalGEM WellSTAR, July 19, 2021; UltraSystems Environmental, Inc., 2021.

Scale: 1:158,400

N

0 1.115 2.23 Miles

0 1.5 3 Kilometers

Legend

- Project Location
- 1-Mile Radius

Oil and Gas Well Status:

- Idle
- Plugged

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Oil & Gas Wells

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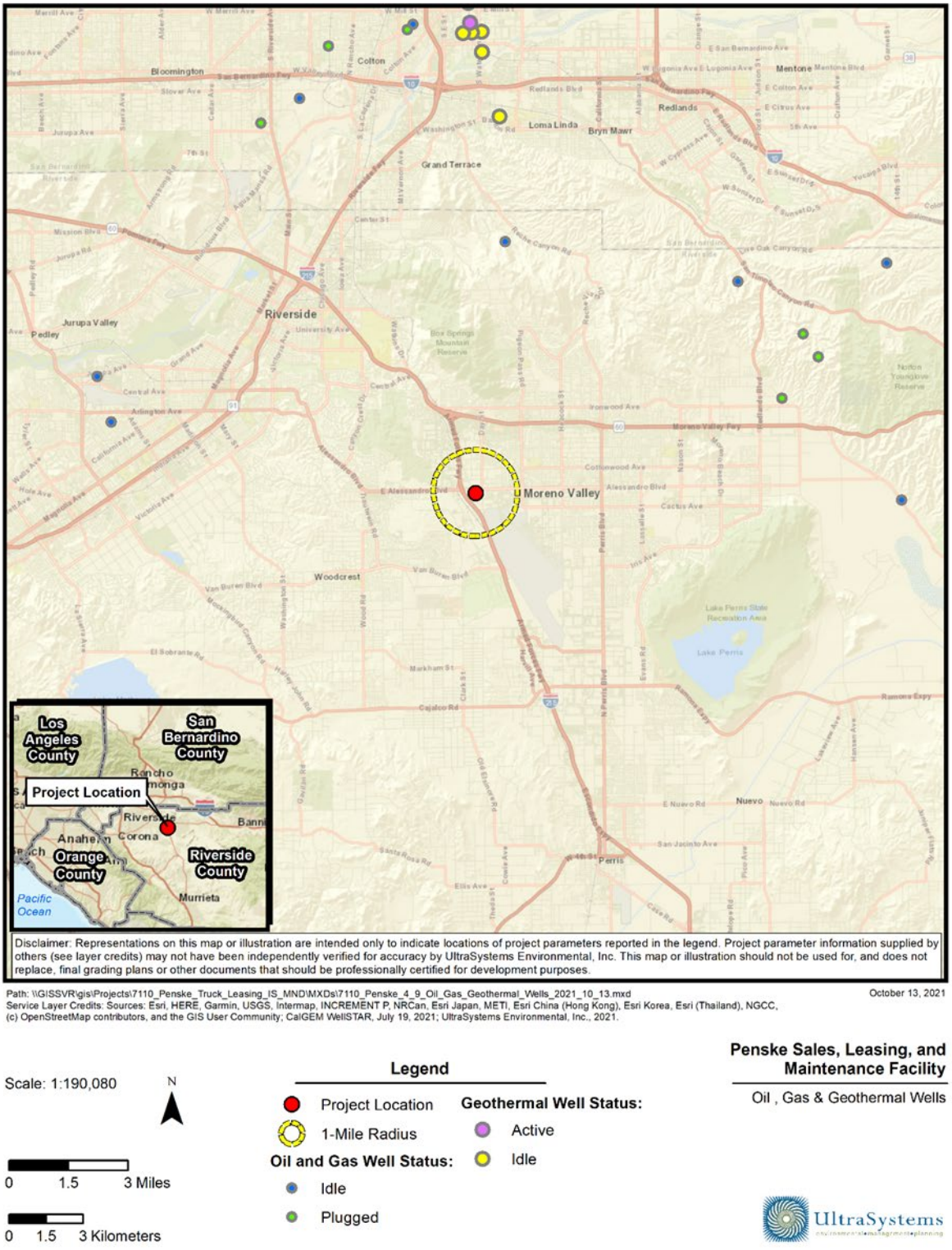
Figure 26 - Geothermal Wells



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

Response:

Characteristics of Sound

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The decibel (dB) scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Because the human ear is not equally sensitive to all frequencies, a special frequency-dependent rating scale is used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) provides this compensation by discriminating against upper and lower frequencies in a manner approximating the sensitivity of the human ear. The scale is based on a reference pressure level of 20 micropascals (zero dBA). The scale ranges from zero (for the average least perceptible sound) to about 130 (for the average human pain level).

Noise Measurement Scales

Several rating scales have been developed to analyze adverse effects of community noise on people. Since environmental noise fluctuates over time, these scales consider that the effect of noise on people depends largely upon the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Those that are applicable to this analysis are as follows:

- L_{eq}, the equivalent noise level, is an average of sound level over a defined time period (such as 1 minute, 15 minutes, 1 hour or 24 hours). Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure.
- L_{90} is a noise level that is exceeded 90 percent of the time at a given location; it is often used as a measure of "background" noise.
- L_{max} is the root mean square (RMS) maximum noise level during the measurement interval. This measurement is calculated by taking the RMS of all peak noise levels within the sampling interval. Lmax is distinct from the peak noise level, which only includes the single highest measurement within a measurement interval.
- CNEL, the Community Noise Equivalent Level, is a 24-hour average L_{eq} with a 4.77-dBA "penalty" added to noise during the hours of 7:00 p.m. to 10:00 p.m., and a 10-dBA penalty added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime (Caltrans, 2013). The logarithmic effect of these additions is that a 60-dBA 24-hour L_{eq} would result in a calculation of 66.7 dBA CNEL.
- L_{dn}, the day-night average noise, is a 24-hour average L_{eq} with an additional 10-dBA "penalty" added to noise that occurs between 10 p.m. and 7 a.m. The L_{dn} metric yields values within 1 dBA of the CNEL metric. As a matter of practice, L_{dn} and CNEL values are considered to be equivalent and are treated as such in this assessment.
-

Existing Noise

UltraSystems Environmental Inc. conducted ambient noise sampling at four locations near the project site, as shown in **Figure 27**. **Table 23** lists the measurement points, sampling locations, and measurement results. Details of the ambient sampling methods and results are provided in **Appendix I**.

The samples were taken between 7:19 a.m. and 8:45 p.m. on Tuesday, July 21, 2021. The 15-minute L_{eq} values ranged from 56.8 to 70.8 dBA. The lowest of these values was measured at Point 4, which is located within the project site along Alessandro Boulevard. The maximum ambient noise level was recorded at Point 1, which is located in front of a single-family residence along Alessandro Boulevard. and north of the project site.

Table 23 - Ambient Noise Measurement Results

Point	Data Set	Sampling Time	Address	Sound Level (dBA)			Notes
				L_{eq}	L_{max}	L_{90}	
1	S254	0719-0734	21872 Alessandro Boulevard	70.8	80.3	56.9	In front of a single-family residence
2	S255	0742-0757	21924 Alessandro Boulevard	62.1	69.8	53.0	In front of a single-family residence
3	S256	0810-0825	13979 Pepper Street	70.3	82.5	58.9	In front of a single-family residence
4	S257	0845-0900	Southeast corner of I-215 (within project boundary)	56.8	69.6	50.5	Near a healthcare center

Source: UltraSystems, 2021.

Sensitive Land Uses

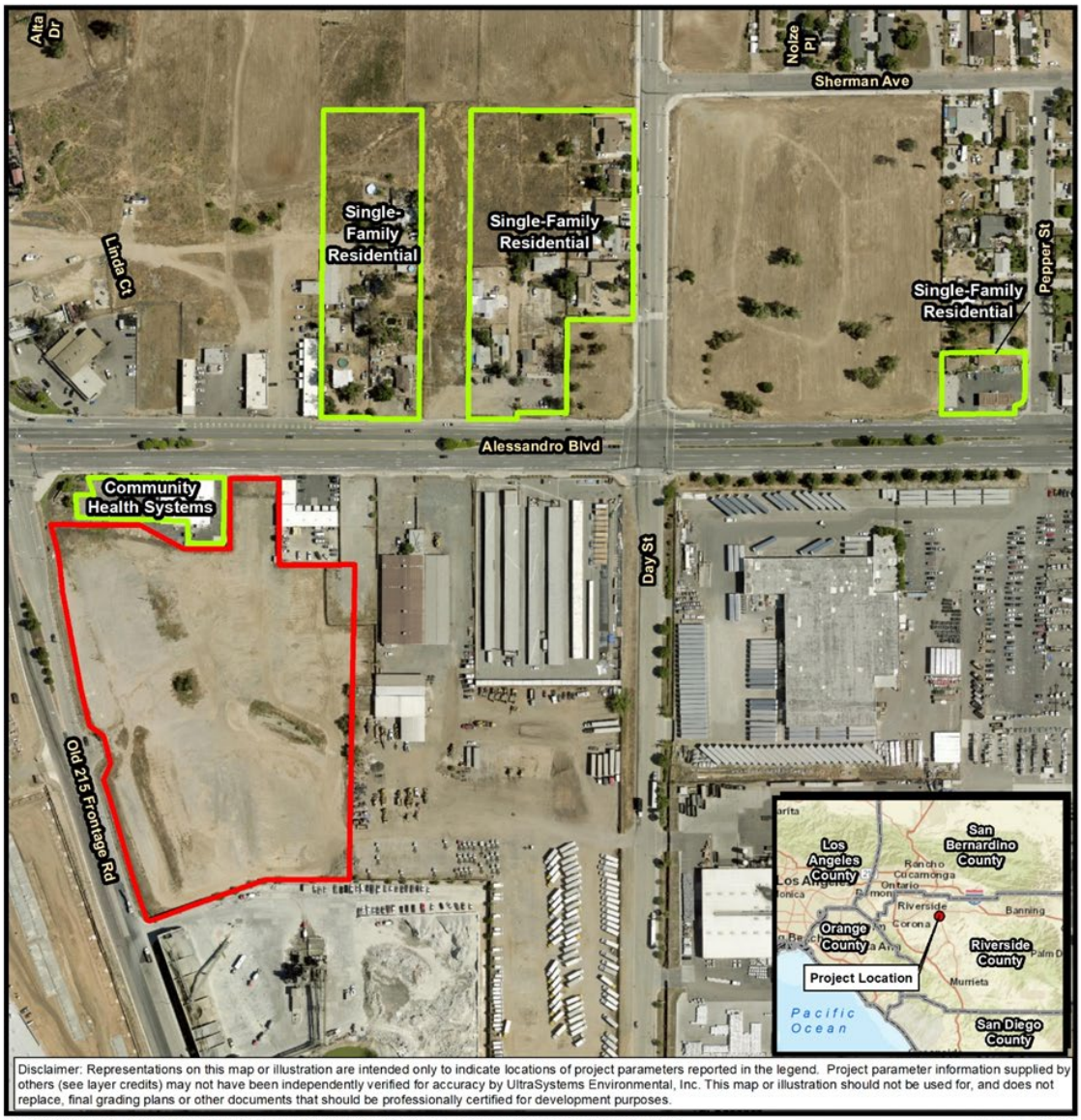
Moreno Valley is subject to typical urban noises such as noise generated by traffic, heavy machinery, and day-to-day outdoor activities. The city of Moreno Valley also has several transportation-related noise sources, including airport and railroad operations, and traffic on major arterials and State Route 60. Noise sources that are not directly related to transportation include noise from commercial and industrial centers, construction, and property maintenance activities. The closest sensitive receivers to the project site include the single-family residences to the north along Alessandro Boulevard. and the single-family neighborhood to the northeast along Alessandro Boulevard. (Google Earth Pro, 2021). Sensitive receivers are shown in **Figure 27. Table 24** summarizes information about them.

Table 24 - Sensitive Receivers in Project Area

Description	Location	Distance From Site Boundary (feet)[a]	Nearest Ambient Sampling Point[b]
Single-Family Residence	21872 Alessandro Boulevard	168	1
Single-Family Residence	21924 Alessandro Boulevard	424	2
Single-Family Residence	22142 Pepper Street	1,281	3
Healthcare Center	21801 Alessandro Blvd	59	4

[a]These are not the distances used for the construction noise calculations; see **Section 4.13.7**.
[a]See **Figure 27** for locations of ambient noise sampling points.

Figure 27 - Sensitive Receivers in Project Area



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November 10, 2022
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community; UltraSystems Environmental, Inc., 2022

Scale: 1:3,300

N

0 137.5 275 Feet

0 40 80 Meters

Legend

Project Boundary

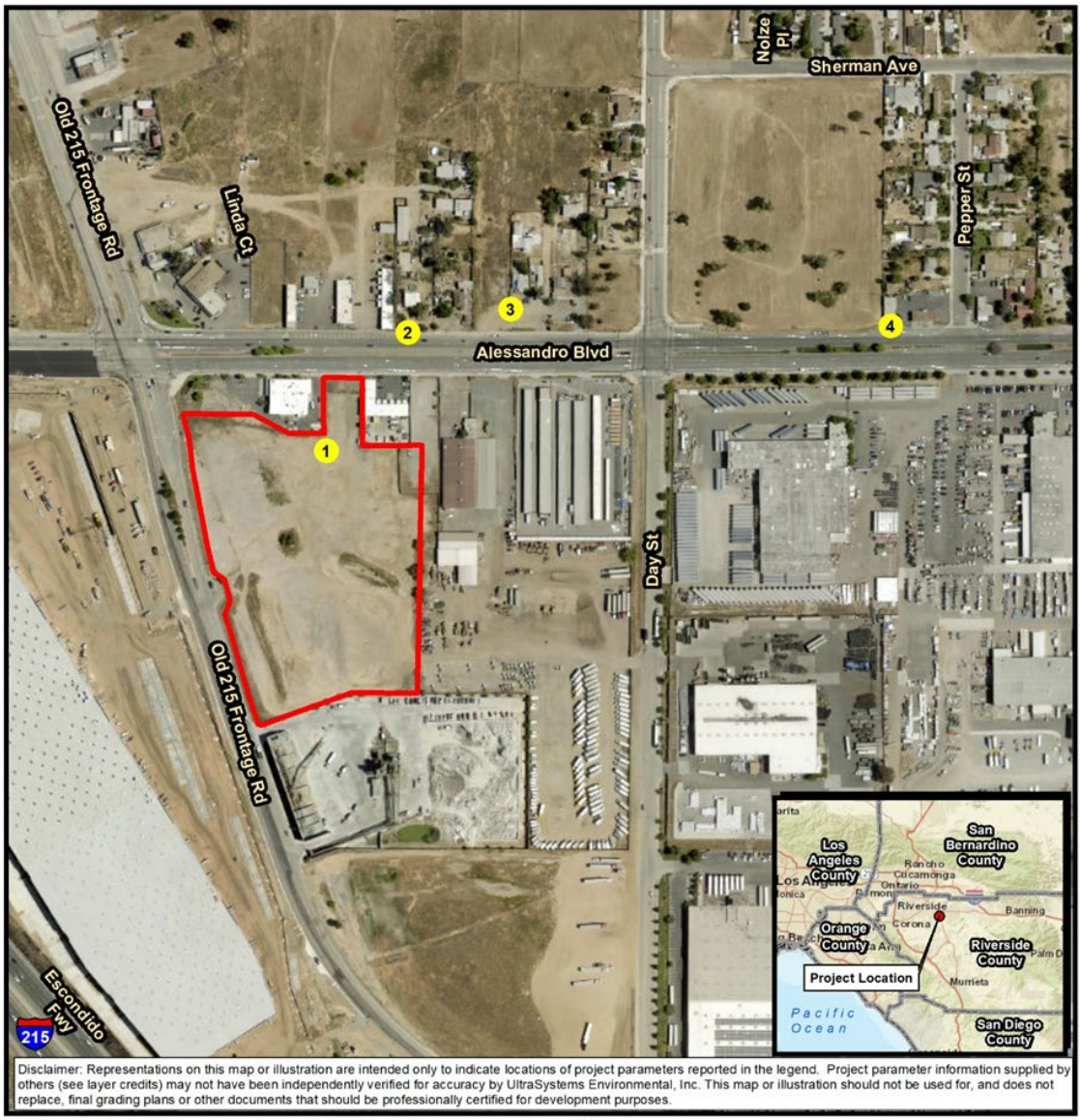
Sensitive Noise Receiver

Penske Sales, Leasing, and Maintenance Facility

Sensitive Noise Receivers

UltraSystems

Figure 28 - Ambient Noise Monitoring Locations



Regulatory Setting

State of California

The most current guidelines prepared by the state noise officer are contained in Appendix D of the General Plan Guidelines issued by the Governor's Office of Planning and Research in 2017 (OPR, 2017).

These guidelines establish four categories for judging the severity of noise intrusion on specified land uses:

- **Normally Acceptable**: Is generally acceptable, with no mitigation necessary.
- **Conditionally Acceptable**: May require some mitigation, as established through a noise study.
- **Normally Unacceptable**: Requires substantial mitigation.
- **Clearly unacceptable**: Probably cannot be mitigated to a less-than-significant level.

The OPR noise compatibility guidelines assign ranges of CNEL values to each of these categories. The ranges differ for different types of sensitive receivers.

City of Moreno Valley General Plan Noise Element

The Moreno Valley General Plan Noise Element has the following goals and policies that apply to proposed project (City of Moreno Valley, 2020):

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

Policies

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.1-4: 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.

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

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

Moreno Valley Municipal Code

11.80.030 Prohibited acts.

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

B. Sound causing permanent hearing loss.

1. Sound level limits. **Table 25**,

Table 26 and **Table 27** specify sound level limits which, if exceeded, will have a high probability of producing permanent hearing loss in anyone in the area where the sound levels are being exceeded. No sound shall be permitted within the city which exceeds the parameters set forth therein.

Table 25 - Maximum Continuous Sound Level[a]

Daily Duration Continuous Hours	Sound Level dBA
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105
0.5	110

Source: City of Moreno Valley Municipal Code § 11.80.030, Table 11.80.030-1.

[a] When the daily sound exposure is composed of two or more periods of sound exposure at different levels, the combined effect of all such periods shall constitute a violation of this section if the sum of the percent of allowed period of sound exposure at each level exceeds 100 percent.

Table 26 - Maximum Impulsive Sound

Number of Repetitions per 24-Hour Period	Sound level dBA
1	145
10	135
100	125

Source: City of Moreno Valley Municipal Code §11.80.030, Table 11.80.030-1A.

2. Exemptions. No violation shall exist if the only persons exposed to sound levels in excess of those listed in Tables 11.80.030-1 and 11.80.030-1A [of §11.80.030] are exposed as a result of:

a. Trespass;

b. Invitation upon private property by the person causing or permitting the sound; or

c. Employment by the person or a contractor of the person causing or permitting the sound.

C. Nonimpulsive Sound Decibel Limits. No person shall maintain, create, operate or cause to be operated on private property any source of sound in such a manner as to create any nonimpulsive sound which exceeds the limits set forth for the source land use category (as defined in **Table 27** when measured at a distance of 200 feet or more from the real property line of the source of the sound, if the sound occurs on privately owned property, or from the source of the sound, if the sound occurs on public right-of-way, public space or other publicly owned property. Any source of sound in violation of this subsection shall be deemed prima facie to be a noise disturbance.

Table 27 - Maximum Sound Levels (in dBA) for Source Land Uses

Residential		**Commercial**	
Daytime	**Night time**	**Daytime**	**Night time**
60	55	65	60
Source: City of Moreno Valley Municipal Code, § 11.80.030, Table 11.80.030-2.			

City of Moreno Valley Significance Thresholds

Two criteria were used in this analysis for judging noise impacts. First, noise levels generated by the proposed project must comply with all relevant federal, state, and local standards and regulations. Noise impacts on the surrounding community are limited by local noise ordinances, which are implemented through investigations in response to nuisance complaints. It is assumed that all existing applicable regulations for the construction and operation of the proposed project would be enforced. In addition, the proposed project should not produce noise levels that are incompatible with adjacent noise-sensitive land uses.

The second measure of impact used in this analysis is a significant increase in long-term noise levels above existing ambient noise levels as a result of the introduction of a new noise source. An increase in noise level due to a new noise source has a potential to adversely impact people. The proposed project would have a significant noise impact if it would do any of the following:

- Expose persons to or generate noise levels in excess of standards recommended in the City of Moreno Valley General Plan Noise Element.
- Generate construction noise exceeding 80 dBA L_{eq} (FTA, 2018, p. 179).
- Include construction activities in or within 500 feet of residential areas between 6:00 p.m. of one day and 7:00 a.m. of the next day, without a permit.

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

- Contribute, with other local construction projects, to a significant cumulative noise impact.
- Increase operational exposures at sensitive receivers (mainly because of an increase in traffic flow) by 5 dBA CNEL or more.

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

Response:

Less than Significant Impact

This section evaluates short-term (construction) and long-term (operational) noise impacts. It also evaluates potential groundborne vibration that would be generated from the construction or operation of the proposed project.

Short-Term Construction Noise

The construction of the proposed project may generate temporary increases in ambient noise levels that exceed the thresholds of significance for this analysis. Noise impacts from construction activities are a function of the noise generated by the operation of construction equipment and onroad delivery and worker commuter vehicles, the location of equipment, and the timing and duration of the noise-generating activities. For the purpose of this analysis, it was estimated that the construction of the proposed project would begin in February 2024 and end in April 2025.

The types and numbers of pieces of equipment anticipated in each phase of construction and development were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1.14 (CAPCOA, 2022). The CalEEMod equipment mix is based on a construction survey performed by the South Coast Air Quality Management District (SCAQMD) (BREEZE Software, 2016b). **Table 28** lists the equipment expected to be used. For each equipment type, the table shows an average noise emission level (in dB at 50 feet, unless otherwise specified) and a "usage factor," which is an estimated percentage of operating time that the equipment would be producing noise at the stated level.[8] Equipment use was matched to phases of the construction schedule.

Table 28 - Construction Equipment Noise Characteristics

Phase Name	Offroad Equipment Type	Amount	Usage Hours	dBA (@ 50 feet)	Usage Factor
Demolition	Concrete/Industrial Saws	1	8.00	90	0.2
	Excavators	3	8.00	80	0.4
	Rubber Tired Dozers	2	8.00	79	0.4
Building construction	Cranes	1	7.00	83	0.08
	Forklifts	3	8.00	67	0.3
	Generator Sets	1	8.00	73	0.5
	Tractors/Loaders/Backhoes	3	7.00	85	0.37
	Welders	1	8.00	74	0.45

8 Equipment noise emissions and usage factors are from Knauer, H. et al., 2006. *FHWA Highway Construction Noise Handbook*. U.S. Department of Transportation, Research and Innovative Technology, Administration, Cambridge, Massachusetts, FHWA-HEP-06-015 (August 2006), except where otherwise noted.

Concrete and Paving Improvements	Cement and Mortar Mixers	2	8.00	85	0.4
	Pavers	1	8.00	77	0.5
	Paving Equipment	2	8.00	85	0.5
	Rollers	2	8.00	74	0.1
	Tractors/Loaders/Backhoes	1	8.00	85	0.37
Final Grading and Landscaping	Excavators	1	8.00	80	0.4
	Graders	1	8.00	85	0.4
	Rubber Tired Dozers	1	8.00	79	0.4
	Tractors/Loaders/Backhoes	3	8.00	85	0.37
Architectural Coating	Air Compressor	1	6.00	81	0.48
Rough Grading	Excavators	1	8.00	80	0.4
	Graders	1	8.00	85	0.4
	Rubber Tired Dozers	1	8.00	79	0.4
	Tractors/Loaders/Backhoes	3	8.00	85	0.37

Using calculation methods published by the Federal Transit Administration (FTA, 2006), UltraSystems estimated the average hourly exposures at the four sensitive receiver locations (refer to **Figure 27**), each of which was at or near an ambient noise measurement point. The distances used for the calculations were from the center of construction activity in each phase to the nearest outdoor area associated with each sensitive receiver. Results are shown in **Table 29.**

Exposures for none of the four sensitive receivers analyzed would exceed the significance criterion of 80 dBA L_{eq} stated above. Therefore, noise impacts related to the construction of the project would be less than significant and no mitigation would be necessary. As shown in **Table 29,** the noisiest construction phase would be concrete and paving, which would result in a maximum hourly L_{eq} of 71.7 dBA (ambient plus contribution from construction).

Table 29 - Estimated Construction Noise Exposures at Nearest Sensitive Receivers

Site	Sensitive Receiver	1-Hour L_{eq} (dBA)[a]					
		Demo	Rough Grading	Building Construction	Concrete and Paving	Architectural Coating	Final Grading
1	21872 Alessandro Boulevard	71.3	71.5	71.6	71.7	70.9	71.5
2	21924 Alessandro Boulevard	64.2	64.9	64.9	65.4	62.7	64.9
3	22142 Pepper Street	70.4	70.5	70.4	70.5	70.3	70.5
4	SE corner of I-215	66.3	67.8	70.7	68.8	63.5	67.8

[a]Values are existing ambient noise plus contribution from construction.

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

Operational Noise

Onsite

Onsite noise sources from the proposed truck sale, rental, service, and fueling facility would include operation of mechanical equipment such as air conditioners, lawnmowers, leaf blowers, and building maintenance equipment; motor vehicles accessing, driving on, and exiting the parking lot; and use of air compressors, power tools and other vehicle maintenance equipment. Much of the vehicle maintenance will be done partly or completely indoors, thus reducing the propagation of noise offsite. Noise levels associated with operation of the project are expected to be comparable to those of nearby land uses. Noise from onsite sources would be less than significant.

Mobile Sources

The principal noise source in the project area is traffic on local roadways. The Project may contribute to a permanent increase in ambient noise levels in the project vicinity due to project-generated vehicle traffic on nearby roadways and at major intersections.

Table 30 - Project Trip Rate

Trip Rate			A.M. Peak Hour			P.M. Peak Hour		
	Unit	ADT	In	Out	Total	In	Out	Total
Truck Sales and Leasing	TSF	5.86	0.90	0.47	1.37	0.61	0.66	1.26
Project Trip Generation	**Size**							
Penske Leasing Center	25.456	145	23	12	35	15	17	32
Source: IBI Group, Traffic Impact Assessment. 2023,								

After passenger car equivalent (PCE) factors are applied, the proposed project would result in 182 PCE daily trips, 44 PCE AM peak hour trips, and 40 PCE PM peak hour trips. The resulting peak hour trip generation estimates are under the 100-peak-hour-PCE-trip screening threshold for VMT analysis and therefore the project would not result in generation of a substantial temporary or permanent increase in ambient noise levels due to mobile sources.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Response:

No Impact

The nearest active public airport is Flabob Airport, located approximately 8.5 miles to the northwest of the project, and the Riverside Municipal Airport is located approximately 9.6 miles to the west. Due to the project's distance from the nearest active airports, it is not located within the boundary of an Airport Influence Area (AIA), or within two miles of a public airport or public-use airport. As a result, the project

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

would not expose people to safety hazards due to proximity to a public airport, and no impacts would occur.

XIV. POPULATION AND HOUSING – Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	☐	☐	☒	☐

Response:

Less than Significant Impact

According to Southern California Association of Governments (SCAG) forecasts, the population of the city of Moreno Valley is expected to increase by approximately 57,000, or 27 percent, between 2021 and 2045. The number of households in the city is expected to increase by approximately 22,000 or 41 percent, and employment in the city is forecast to increase by approximately 17,800 or 38 percent over the same period. See Table 31 (CDF, 2021; SCAG, 2020; US Census, 2022).

Table 31 - City of Moreno Valley Demographic Forecast City of Moreno Valley Demographic Forecast

	2021	2045	Difference, 2045 - 2021	Percent Difference, 2045 - 2021
Population	209,426	266,800	57,374	27.4%
Households	54,188	76,200	22,012	40.6%
Employment	47,079	64,900	17,821	37.9%

Sources: CDF, 2021; SCAG, 2020; US Census, 2022

Note that the City's 2021-2029 Draft Housing Element (Housing Element) envisions a faster rate of housing growth than was forecast by SCAG in 2020. The number of housing units in the city was estimated at 57,725 in 2021 by the California Department of Finance (CDF, 2021). The Housing Element sets forth the Regional Housing Needs Assessment (RHNA) for the City of 13,595 units for the 2021-29 period (City of Moreno Valley, 2021b). If the City achieves the RHNA numbers, the number of housing units would be approximately 71,320 in 2029. The project proposes an approximately 9.63-acre truck leasing, sales, and maintenance facility. It does not propose the construction of any residential uses, nor does it include the extension of existing infrastructure. Project operation is estimated to generate 31 jobs; project construction would generate a small number of temporary jobs. Estimated project employment would be within the existing regional forecast for the city of Moreno Valley and thus would be a less than significant impact. The unemployment rate in Riverside County in December 2022 was 6.3 percent (EDD, 2023). It is expected that project-generated employment would be absorbed from the regional labor force and would not attract workers from outside of the region to move into the project region. The project would have a less than significant impact in this regard.

Table 32 - Project Employment

Shift	Hours	Category	Number
Day	6:00 a.m. to 3:00 p.m.	Diesel technicians and service staff	15
		Office staff (rental, leasing, sales)	3
		Subtotal	18
2nd	3:00 p.m. to 12:00 midnight	Diesel technicians including 1 supervisor	12
		Office staff	1
		Subtotal	13
Total	Not applicable	Not applicable	31
Source: Penco Engineering, Inc. 2021			

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Response:

No Impact

Parts of the project site are used for the storage of truck trailers; the site is otherwise vacant. Project development would not displace existing residents or housing, and no impact would occur.

XV. PUBLIC SERVICES – Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☒	☐
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

Response:

i) Fire Protection?

Less than Significant Impact

The Moreno Valley Fire Department (MVFD) provides fire protection and emergency medical services to the city of Moreno Valley including the project site, through contracts between the City of Moreno Valley, the Riverside County Fire Department, and the California Department of Forestry and Fire Protection (CAL FIRE). MVFD operates seven fire stations. The nearest MVFD fire station to the project site is Station 6 (Towngate Station) at 22250 Eucalyptus Avenue, approximately 1.7 miles to the north by road. Station 6 is equipped with One Type 1 engine, one Type 1 reserve engine and one Paramedic Squad (Recon, 2021). Station 65, now at 15111 Indian Street, is planned to be moved to a location on Alessandro Boulevard east of Graham Street approximately two miles east of the project site. MVFD's response time goal is 5 minutes from dispatch to arrival for 90 percent of calls for service (Recon, 2021). Travel time from Station 6 to the project site is approximately four minutes, within MVFD's response time goal.

Project development could generate a very slight increase in demand for fire protection and emergency medical services. The project site is in Compatibility Zone 2B, the High Noise zone, respecting March Air Reserve Base (MARB) designated by the Riverside County Airport Land Use Commission. Zone 2B is an area of moderate risk from aviation accidents. The Riverside County Airport Land Use Plan places several conditions on developments in Zone B2: Project compliance with these development requirements would help minimize risk of fire related incidents. Therefore, potential impacts related to the provision of fire protection services would be less than significant impact.

ii) Police Protection?

Less than Significant Impact

The Moreno Valley Police Department (MVPD) provides police protection to the city of Moreno Valley through a contract between the City and the Riverside County Sheriff's Department (RCSD). MVPD is organized into five divisions: Administration, Detective, Patrol, Special Enforcement, and Traffic. The Patrol Division is staffed by nine sergeants, 64 sworn patrol officers, three K-9 teams, and 10 nonsworn officers (Recon, 2021).

The city is divided into four zones; officers are assigned to specific zones. The boundary between zones 2 and 3 is on Alessandro Boulevard including along the site frontage (MVPD, 2022). The Moreno Valley Police station is at 14177 Frederick Street at the intersection of Frederick Street and Alessandro Boulevard. The City is planning an expansion of the Civic Center complex including a remodeled Public Safety Building capable of accommodating roughly 600 total personnel, as well as a new police substation in the southeastern part of the city to serve new and planned development (Recon, 2021).

Calls to the MVPD are prioritized 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 (Recon, 2021). MVPD response time targets, and actual response times for 2019—the latest year for which data are available—are shown below in **Table 33.**

Table 33 - Moreno Valley Police Department Response Time Targets and Actual 2019 Response Times

Call Type	Target (minutes)	Response Time (2019) (minutes: seconds)
Priority 1	6	6:37
Priority 2	15	22:01
Priority 3	35	42:46
Source: Recon, 2021		

Demands for police services are generated by the population and total building area in the police agency's service area. Project development would not add population in the city of Moreno Valley (indirect project impacts on population, due to project employment generation, are addressed in the Population and Housing Section of this Initial Study). The proposed development would add two buildings totaling approximately 20,992 square feet of building area. Project operation would also involve parking large numbers of trucks outdoors. Project operation would involve standard Penske Corporation security measures: gates would be locked when the facility was not open to customers; site access would be controlled during hours the facility was not open to customers so that only authorized staff and first responders could enter; and keys to trucks would be stored in a secured location and could only be accessed by authorized staff. Project development would not require construction of a new or expanded police station, and impacts would be less than significant.

iii) Schools?

No Impact

The project site is located within the Moreno Valley Unified School District (MVUSD). MVUSD operates 23 elementary schools, six middle schools, and five high schools; districtwide enrollment in the 2020-21 school year was 31,597 (CDE, 2022). MVUSD encompasses approximately 76 square miles including most of the city of Moreno Valley, part of the city of Riverside, and surrounding areas of unincorporated Riverside County. The project site is in the attendance boundaries of Serrano Elementary School; Badger Springs Middle School; and Moreno Valley High School (MVUSD, 2022). Demand for schools is generated by the numbers of households in the school's attendance boundaries. The project does not propose development of housing and would not increase the number of households in the attendance boundaries of the three schools. Project construction and operation are not expected to increase the population in the MVUSD; indirect project population impacts arising from project-generated employment are addressed in the **Population and Housing Section** above. No impact would occur.

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

iv) Parks?

No Impact

The City of Moreno Valley Parks and Community Services Department maintains 35 parks totaling approximately 482 acres. Two parks are within approximately one mile of the project site: Civic Center Park at 14075 Frederick Street, with an outdoor amphitheater and benches; and Mitchell Memorial Park at 22631 Bay Avenue, with basketball courts, barbecues, horseshoes, picnic tables, playground, and a walking path (Recon, 2021). Demands for parks facilities and services are generated by the populations in the parks' service areas. The project does not propose residential development and would not increase population in the project region. No impact would occur.

v) Other Public Facilities?

No Impact

The Moreno Valley Public Library (MVPL) provides library services to the city of Moreno Valley. MVPL operates three library facilities; the two closest facilities to the project site are the Main Branch Library at 25480 Alessandro Boulevard, and the Mall Branch Library at 22500 Town Circle (MVPL, 2022). Demands for library facilities and services are generated by the populations in the libraries' service areas. The project does not propose residential development and would not increase population in the project region. No impact would occur.

XVI. RECREATION – Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒

Response:

No Impact

The City of Moreno Valley Parks and Community Services Department maintains 35 parks totaling approximately 482 acres (Recon, 2021).

Five parks are within approximately two miles of the project site:

- Civic Center Park at 14075 Frederick Street, with an outdoor amphitheater and benches;
- Mitchell Memorial Park at 22631 Bay Avenue, with basketball courts, barbecues, horseshoes, picnic tables, playground, and a walking path;
- Towngate Memorial Park at 13051 Elsworth Street, with barbecues, multi-use athletic fields, picnic tables, playground, lit softball/baseball field, and a walking path;
- Towngate II Park at 13051 Elsworth Street, with a banquet facility, barbecues, picnic tables, playground, and a walking path; and
- Moreno Valley Community Park at 13380 Frederick Street, with barbecues, picnic tables, playground, skate park, snack bar, and four lit soccer fields (Recon, 2021).
-

Demands for parks facilities and services are generated by the populations in the parks' service areas. The project will not generate new population and project development would not cause or accelerate substantial physical deterioration of parks. No impact would occur.

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

Response:

No Impact

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

The project does not propose new or expanded recreational facilities, and project development would not require construction of offsite recreational facilities, that could have potential adverse environmental impacts. Therefore, no impact would occur.

XVII. TRANSPORTATION – Would the project:

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

Response:

Less than Significant Impact

Vehicular access to the project site is via a driveway from Alessandro Boulevard. Class II (striped) bicycle lanes are present on both sides of Alessandro Boulevard and Old 215 Frontage Road along the project site frontages. Sidewalks are present on the south side of Alessandro Boulevard along the site frontage. Alessandro Boulevard along the site frontage is a five-lane divided road with two westbound travel lanes and three eastbound lanes with a raised median in some places and a two-way median turn lane in other places. Old 215 Frontage Road along the site frontage is a four-lane divided roadway with a raised median along the north half of the site frontage and a two-way median turn lane along the south half.

The intersection of Old 215 Frontage Road and Alessandro Boulevard is signalized. Riverside Transit Authority (RTA) Route 20 operates on Alessandro Boulevard, extending from the city of Moreno Valley in the east to the city of Riverside in the west. Route 20 operates seven days per week at hourly frequencies (RTA, 2022). The Metrolink Perris Valley Line extends from Perris to downtown Los Angeles with four trips between Perris and Los Angeles in each direction on weekdays and two trips in each direction on weekends. The Metrolink Moreno Valley/March Field Station is on Meridian Parkway approximately one mile by road west from the project site.

Applicable Plans, Ordinances, and Policies

City of Moreno Valley Bicycle Master Plan

The 2014 Moreno Valley Bicycle Master Plan recommends the implementation of a network of bicycle facilities and identifies potential funding sources for such improvements (City of Moreno Valley, 2014, p. iv).

City of Moreno Valley Development Impact Fee (DIF) Program

The City imposes development impact fees on development projects to lessen the impact on public services, infrastructure, and facilities.

Transportation Uniform Mitigation Fee (TUMF)

The Western Riverside Council of Governments (WRCOG) developed and administers the Transportation Uniform Mitigation Fee (TUMF), a program that ensures that new development pays its fair share for the increased traffic that it creates. The TUMF will raise over $3 billion for transportation projects in Western Riverside County.

Riverside County Transportation Improvement Program

The Riverside County Transportation Department plans, designs, funds, builds, operates, and maintains roads, bridges, and transportation facilities within the unincorporated areas of the County of Riverside spanning approximately 7,300 square miles. The county-maintained road system is over 2,200 miles. The Transportation Department also maintains 116 bridges in the unincorporated area and 616 traffic signals (160 within the unincorporated area and 456 within contracted cities). The Transportation Improvement Program (TIP) included $771 million in improvements in fiscal years 2020/21 and 2021/22 (Riverside County, 2020).

Riverside County Long-Range Transportation Study

The Riverside County Long Range Transportation Study (LRTS), completed by the Riverside County Transportation Commission (RCTC) in December 2019, aims to develop strategies to address

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

transportation challenges, provide a realistic vision of transportation in Riverside County in 2045, develop a list of high priority feasible and fundable projects; it comprises RCTC's input to the Southern California Association of Governments (SCAG)'s 2020 RTP/SCS (Connect SoCal). The LRTS includes 187 projects consisting of 130 state highway and major roadway projects and 57 major local and regional transit projects (RCTC, 2019).

Project development would not conflict with plans, ordinances, or policies governing the circulation system. Project construction would involve driving construction equipment and trucks across a Class II bicycle lane. The project construction contractor would use standard safety measures to minimize hazards to bicyclists from construction traffic.

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

Response:

No Impact

The project would generate about 182 daily trips, 44 AM peak hour trips, and 40 PM peak hour trips. The typical number of miles associated with each trip is not known. The resulting peak hour trip generation estimates are under the 100 peak hour trip threshold and therefore the project is considered exempt from preparing the LOS portion of the TIA (refer **to Appendix G Traffic Impact Assessment Memorandum**).

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

Response:

Less than Significant Impact

Site access would be from two driveways, one from Alessandro Boulevard and a second from Old 215 Frontage Road. A third exit-only driveway would provide access from the site to Old 215 Frontage Road; that driveway would be right-out only due to the roadway being divided there.

All onsite access and sight-distance setbacks would be in accordance with the City of Moreno Valley's design requirements. The project would not substantially alter or impact roads or sight lines. The facility would not rent farm equipment, construction equipment, or other unusually slow vehicles that would present a traffic hazard. Therefore, the project would not increase hazards due to a geometric design feature, and traffic hazard impacts would be less than significant.

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

Response:

No Impact

Construction

The City requires the preparation and implementation of a Traffic Management Plan (TMP) for all projects that require construction in the public right-of-way (ROW). The TMP must be reviewed and approved by the City's Traffic Engineer prior to the start of construction activity in the public ROW. The typical TMP requires such things as the installation of K-rail between the construction area and open traffic lanes, the use of flaggers and directional signage to direct traffic where only one travel lane is available or when equipment movement creates temporary hazards, and the installation of steel plates to cover trenches under construction. Emergency access must be maintained. Compliance with City requirements for traffic management during construction in the public ROW would ensure adequate emergency access.

Operation

The project would comply with applicable City regulations, including the City's Fire Code with regard to providing adequate emergency access. Prior to the issuance of building permits, the City of Moreno Valley would review project site plans, including the location of all buildings, fences, access driveways,

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

and other features that may affect emergency access. Fire lanes would be provided for adequate emergency access. The site design for the proposed project includes access and fire lanes that would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. All onsite access and sight-distance requirements would be in accordance with City design requirements. The City's review process and compliance with applicable regulations and standards would ensure that adequate emergency access would be provided at the project site at all times. Therefore, the proposed project would not result in inadequate emergency access and there would be no impact in this regard.

XVIII. TRIBAL CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐

Response:

Information from the Cultural Resources Inventory report of June 2022, prepared for the Penske Truck Leasing Service Facility project by UltraSystems (**Appendix D**), describes the research for and analysis of potential cultural resources data conducted for the project. This research included cultural resources records search at the Eastern Information Center (EIC), a Sacred Lands File (SLF) record search by the Native American Heritage Commission (NAHC), and a pedestrian survey assessment.

Based on the cultural resources records search by the EIC, it was determined that no cultural resources have been previously recorded within the project site boundary. Within the one-half-mile buffer zone, there are one prehistoric site and twelve historic-era cultural resources recorded

Approximately one-half mile due west of the project boundary a prehistoric site (CA-RIV-5429) is recorded consisting of a milling boulder outcrop with 12 milling elements and five granite features. A historic refuse scatter (CA-RIV-4193) is recorded located approximately one-quarter of a mile to the west of the project site containing glass, ceramics, and can metal. During the pedestrian archaeological field survey this area along Alessandro Boulevard west of the project site was driven through and it was observed that both the milling feature and historic trash feature had since been developed and built upon. Running along the west side of the project boundary is the San Jacinto Valley Railway (33-015743), an extension of the Southern California Railway that was built in 1888 and abandoned by 1978. (See **Aesthetics** in **Appendix D1** for supporting references for these resources.)

No prehistoric or historic archaeological resources were observed during the field survey. The results of the pedestrian assessment indicate it is highly unlikely that historic properties will be adversely affected by construction of the project. The cultural resource study findings at the EIC also suggests that there is a low potential for finding resources.

Commission Records Search and Native American Contacts" in **Appendix D1 to this Initial Study**). Additionally, the project site has not been recommended for historic designation for prehistoric and TCRs.

Tribal outreach was conducted with local tribes listed by the NAHC with letters and emails sent November 1, 2021. Mr. Paul Macarro, Cultural Resources Coordinator with the Pechanga Band of Luiseño Indians responded they had listed a SLF site in the Sycamore Canyon area but that the NAHC may be delayed in filing it; also, that the site should be on file with the CHRIS. Mr. O'Neil attempted to contact the NAHC via email concerning this new SLF site but received no reply; the CHRIS recoords search for this project area had not indicated any further reports or site records related to a TCR. On November 17, 20221 Mr. O'Neil requested further information on the TCR from Mr. Macarro, but there was no response.

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

Less than Significant Impact with Mitigation Incorporated

The Cultural Resources investigation determined that there are no tribal cultural resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k) within the project site or within a half-mile buffer surrounding the project site. Therefore, no impact would occur.

In addition, no sites were documented in the NAHC's Sacred Lands File search. No resources as defined by Public Resources Code § 21074 have been identified (**Attachment C**: "Native American Heritage A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Furthermore, with implementation of **mitigation measures TCR-1** through **TCR-9,** potential project impacts on TCRs would be less than significant.

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Response:

Less than Significant Impact with Mitigation Incorporated

Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American Tribes on potential impacts on tribal cultural resources (TCRs), as defined in Public Resources Code § 21074. TCRs are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources (California Natural Resources Agency [CNRA], 2007).

As part of the AB 52 process, Native American tribes must submit a written request to a lead agency to be notified of projects within their traditionally and culturally affiliated area. The lead agency must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receiving this notification if they want to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either (1) the parties agree to mitigation measures (MM) to avoid a significant effect on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

Letters were sent by the City of Moreno Valley's Planning Department (City), which is the CEQA Lead Agency for the proposed project, to local Native American tribes asking if they wished to participate in AB 52 consultation concerning the project. The letters were sent by Ms. Danielle Harper-Scott, Senior Planner with the City's Community Developed Department, on April 27, 2023. They were sent by certified mail to the tribes listed below:

- Agua Caliente Band of Cahuilla Indians,
- Desert Cahuilla Indians,
- Morongo Band of Mission Indians (Cultural Resource Specialist),
- Morongo Band of Mission Indians (Tribal Chair),
- Pechanga Band of Indians,
- Rincon Band of Luiseño Indians,
- San Manuel Band of Missions,
- Soboba Band of Luiseño Indians.

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

The City received a reply from the Agua Caliente Band of Cahuilla Indians (ACBCI) on May 9, 2023 indicating that the project area is not located within the boundaries of the ACBCI Reservation and requested the cultural resources inventory of the project area by a qualified archaeologist prior to any development activities in this area, a copy of the records search, and copies of any cultural resource documentation generated in connection with this project. On August 31, 2023, Ms. Harper-Scott, indicated that the ACBCI had requested consultation and that potential dates were provided to the tribe (personal communication from Ms. Harper-Scott on August 31, 2023 to Megan B. Doukakis). The tribe did not respond to the email with the suggested consultation dates. As these dates lapse, Ms. Harper-Scott will contact the Agua Caliente Band of Cahuilla Indians again. A follow up email requesting availability to schedule consultations was sent by the City on September 13, 2023. An additional follow up email was sent by the City on October 5, 2023 (personal communication from Ms. Harper-Scott on October 5, 2023 to Ms. Megan B. Doukakis). The City is awaiting review and acceptance of standard mitigation measures (Harper-Scott, personal communication via email, December 12, 2023). The ACBCI responded on December 19, 2023 stating that they defer to the Morongo Band of Mission Indians and the Pechanga Band of Luiseno Indians for monitoring and requested removal of AGBMI from **MM CR-2** (personal communication from Ms. Harper-Scott on December 28, 2023 to Mr. O'Neil). This concluded their consultation.

The City received a reply from the Rincon Band of Luiseño Indians on May 11, 2023 requesting copies of existing documents pertaining to the project, including the cultural survey, archaeological site records, shape files, archaeological record search results, a geotechnical report, and the grading plans. Ms. Harper-Scott indicated that the tribe had requested consultation and that potential dates were provided to the tribe (personal communication via telephone from Ms. Harper-Scott on August 31, 2023 to Ms. Doukakis). The tribe had not responded to the email with the suggested consultation dates. As these dates lapse, Ms. Harper-Scott will contact the Rincon Band of Luiseño Indians again. A follow up email requesting availability to schedule consultations was sent by Ms. Harper-Scott on September 13, 2023. An additional follow up email was sent by Ms. Harper-Scott on October 5, 2023 providing the Band related documents (personal communication from Ms. Harper-Scott on October 5, 2023 to Ms. Doukakis). Rincon provided a letter dated October 13, 2023 stating that the Rincon Band had reviewed the provided documents and have no further comments. The Rincon Band will defer all further consultation to the Pechanga Band of Indians. This concluded their consultation.

The Pechanga Band of Mission Indians (PBMI) responded to the City on May 16, 2023, stating that they wished to consult with the City. Pechanga's consultation request letter included notification that the Project site is located within a Traditional Cultural Property (TCP) and that potential TCRs may be impacted by the proposed Project. Additionally, the Tribe requested that no Phase II testing or other ground-disturbing archaeological activities be conducted on the site until after the Tribe and the City consult about the TCRs in their AB 52 government-to-government consultation.

During the July 26th consultation meeting, the PBMI requested a copy of the Section 4.18 – TCRs of the IS/MND to review. This section was provided on September 13, 2023. No mitigation measures were provided at this time. During consultation Pechanga identified the previously noted TCP site is a Traditional Cultural Landscape and that an Extensive Village / Landscape is located west of the project site. The Band noted that the project would not have a significant impact on the TCR, but that the potential impact should be stated as "Less Than Significant with Mitigation Incorporated" due to there being a known TCR in the project area. Consultation continued following review of the IS/MND by the tribe. An additional follow up email was sent by Ms. Harper-Scott on October 5, 2023 (personal communication from Ms. Harper-Scott via email, October 5, 2023 to Ms. Doukakis). The City is awaiting review and acceptance of recommended mitigation measures (Harper-Scott, personal communication via email, December 12, 2023). (Personal communication from Ms. Harper-Scott February 14 and February 20, 2024; Pechanga review of draft Section 4.18 received February 7, 2024.) Since Pechanga's review of the Section 4.18 draft, further **TCR MM**s have been added that would mitigate the TCR.

The Morongo Band of Mission Indians (MBMI) requested consultation on June 30, 2023. Although this request was received after the request closure date of June 1, 2023, the City will accept their request for consultation. A follow up email requesting availability to schedule consultations was sent by Ms. Harper-

Scott on September 13, 2023. An additional follow up email was sent by Harper-Scott on October 5, 2023 (personal communication from Ms. Harper-Scott via email, October 5, 2023 to Ms. Doukakis). Modified mitigation measures were provided by Morongo on November 29, 2023. The City provided its standard TCR mitigation measures to Morongo for review. Morongo had not yet provided any further comments and the tribe did not consider consultation concluded as of that date (Harper-Scott, personal communication via email, December 12, 2023). As of December 12, 2023 the Lead Agency incorporated Morongo's recommended tribal cultural resource mitigation measures with the ACBCI's suggested edits, including Morongo as a monitoring tribe. Morongo does not consider consultation closed until the project is completed, considering monitoring and satisfying mitigation measures as part of the process (Harper-Scott, personal communication on February 22, 2024).

The Soboba Band of Luiseño Indians did not request consultation.

No resources as defined by Public Resources Code § 21074 have been identified (**Attachment C**: "Native American Heritage Commission Records Search and Native American Contacts" in **Appendix D to this Initial Study**). Additionally, the project site has not been recommended for historic designation for prehistoric resources and TCRs. No specific tribal resources have been identified.

During the cultural resources record search at the EIC, no prehistoric or historic resources were found within the project site. One prehistoric site was identified within the half-mile buffer zone, 12 historic properties were identified within the half-mile buffer zone, including an historic dump, ten residences, and the San Jacinto Valley Railway extension of the Southern California Railway, the majority of which have been destroyed or abandoned. The results of the pedestrian assessment indicate it is highly unlikely that historic properties will be adversely affected by construction of the project. The cultural resource study findings at the SCCIC suggest that there is a low potential for finding resources.

The contacted tribes did not note the presence of TCRs at or near the project site excepting Pechanga's description of a TCP consisting of a village / landscape to the west. There is no substantial evidence that TCRs are present on the project site, including no sites listed with the SLF or the EIC, or noted by the consulting tribes during AB 52 consultation.

Mitigation for minimizing impacts on potential TCRs is applicable to the project site because the land at the site was used for farming in the past and vehicle storage in recent years, resulting in considerable surface disturbance to the native soil by grading. Therefore, the potential for subsurface cultural and or historical deposits is considered to be moderate. The applicable mitigation measure related to TCRs is provided below.

Mitigation Measure

TCR 1 Archaeological Monitoring: Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all ground disturbing activities. The Project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist, in consultation with the Consulting Tribe(s) including Pechanga Band of Mission Indians, Morongo Band of Mission Indians, and Agua Caliente Band of Cahuilla Indians, the contractor, and the City, shall develop a Cultural Resources Monitoring Plan (CRMP) as defined in CR-3. The Project Archaeologist shall attend the pre-grading meeting with the City, the construction manager and any contractors, and Consulting Tribal representatives; and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance before any ground-disturbing activity takes place. The archaeological monitor, provided by the Project Archaeologist, shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological resources are unearthed.

TCR 2 Native American Monitoring: Prior to the issuance of a grading permit(s), the Developer shall secure agreements with the Pechanga Band of Mission Indians and the Morongo Band

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

TCR 3 Cultural Resource Monitoring Plan (CRMP): The Project Archaeologist, in consultation with the Consulting Tribe(s), the principal contractor, and the City, shall develop a CRMP in consultation pursuant to the definition in AB52 to address the details, timing, and responsibilities of all archaeological and cultural activities that will occur on the Project site. A consulting Tribe is defined as a Tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB52 consultation process, and has completed AB 52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include:

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

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

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

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

If any suspected archaeological resources are discovered during ground-disturbing activities and the Project Archaeologist and/or Native American Tribal Representative(s) are not present, the construction supervisor is obligated to halt work in a 100-foot radius

around the discovery and call the Project Archaeologist and the Tribal Representatives to the site to assess the significance of the find.

TCR 6 Inadvertent Finds: If potential historic or cultural resources are uncovered during excavation or construction activities during the Project and which were not assessed within the archaeological report(s) and/or environmental assessment conducted prior to Project approval, all ground-disturbing activities in the affected area and within 100 feet of the uncovered resource must cease immediately and a qualified person meeting the Secretary of the Interior's standards (36 CFR 61), Tribal Representative(s), and all site monitors per the Mitigation Measures, shall be consulted by the City to evaluate the find, and, as appropriate, recommend alternative measures to avoid, minimize, or mitigate negative effects on the historic or prehistoric resource. Further ground disturbance shall not resume within a 100 foot-radius of the discovery. A physical barrier will be constructed, and all Project personnel will be excluded from this protected area. A Treatment Plan will be prepared by the Project Archaeologist and approved by all Consulting Parties. The Treatment Plan will be implemented. After treatment is completed, work may resume within the protected area of the discovery. Work shall be allowed to continue outside of the protective buffer area and will be monitored by an additional archaeologist and Tribal Monitors, if needed. Determinations and recommendations by the Project Archaeologist shall be immediately submitted to the Planning Division for consideration, and implemented as deemed appropriate by the Community Development Director, in consultation with the State Historic Preservation Officer (SHPO) and any and all Consulting Native American Tribes as defined in CR-3, before any further work commences in the affected area. If the discovery is determined to be significant and avoidance cannot be achieved, a Phase III data recovery plan shall be prepared by the Project Archaeologist, in consultation with the Consulting Tribes, and shall be submitted to the City and Consulting Tribes for their review and approval prior to implementation of the said plan.

TCR 7 Human Remains: If human remains and/or cremations are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin.

a. Should human remains and/or cremations be encountered on the surface or during any and all ground-disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), work in the immediate vicinity of the discovery shall immediately stop within a 100-foot radius of the discovery. The area shall be protected by a physical barrier; project personnel/observers will be restricted from entering this area. The County Coroner is to be contacted within 24 hours of discovery. The County Coroner has 48 hours to make his/her determination pursuant to State and Safety Code §7050.5. and Public Resources Code (PRC) § 5097.98.

b. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.

c. The Native American Heritage Commission shall immediately notify the person or persons it believes to be the Most Likely Descendant (MLD). The MLD has 48 hours, upon being granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to PRC §5097.98

d. **No photographs are to be taken except by the Coroner, with written approval by the Consulting Tribe[s].**

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

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

TCR 9 Archaeological Report - Phases III and IV: Prior to final inspection by the City, the developer/permit holder shall prompt the Project Archaeologist to submit two (2) copies of the Archaeological Report, including the Phase III Data Recovery Report (if required for the Project) and the Cultural Resources Monitoring Report (Phase IV) that comply with the Community Development Department's requirements for such reports. The Phase IV Report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the Reports to determine adequate mitigation compliance. Provided that the Reports are adequate, the Community Development Department shall clear this condition. Once the Report(s) are determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside (UCR) and one (1) copy (including all site record forms, if created during the Project) shall be submitted to each of the Consulting Tribe(s) Cultural Resources Department(s) or Tribal Historic Preservation Officer (THPO).

Level of Significance After Mitigation

With implementation of **MM TCR-1** through **TCR-9,** potential project impacts on TCRs would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

Response:

Less than Significant Impact

Water Treatment: The Eastern Municipal Water District (EMWD) supplies water to the project site. EMWD water supply in the project region is from northern California, imported via the State Water Project (EMWD, 2020).[9] Water is treated at the Metropolitan Water District's Mills Filtration Plant in the City of Riverside, which has capacity of 220 million gallons per day (MWD, 2021). The proposed project would not require new or expanded water treatment facilities. The project would have a less than significant impact in this regard.

Wastewater Treatment: The project site is in the service area of EMWD's Moreno Valley Regional Water Reclamation Facility (MVRWRF). The MVRWRF has capacity of 17,900 acre-feet per year (afy), treated 10,451 afy of wastewater in 2020, and had residual capacity in 2020 of 7,449 afy (EMWD, 2021).

[9] EMWD imported water supplies, in other portions of its service area, also include water imported from the Colorado River via the Colorado River Aqueduct. EMWD imported water supplies in the project region—approximately the northwest third of EMWD's service area—are only from northern California (EMWD, 2020).

Estimated project wastewater generation is approximately 14,309 gallons per day (gpd) or 16 acre-feet per year, as shown below in **Table 34**. Sufficient wastewater treatment capacity is available in the region for project wastewater generation, and project impacts would be less than significant.

Table 34 - Estimated Project Wastewater Generation

Building	Land Use	Square Feet	Wastewater Generation, gallons per day	
			Per square foot[1]	Total
1	Service Facility and Wash Bay	17,168	0.8	13,735
	Rental and sales office	2,032	0.15	305
2	Rental and sales office	1,792	0.15	269
Total		**20,992**		**14,309**

[1] Source: City of Los Angeles, 2006

Stormwater Drainage: The existing drainage pattern onsite is surface flow to the northwest. Runoff leaves the site and enters catch basins near the intersection of Old 215 Frontage Road and Alessandro Boulevard. Runoff from east and northeast of the project site flows onto the site; and flows across the site and exits the site as described. The catch basins are parts of a network of storm drains that discharges to the San Jacinto River. A 24-inch reinforced concrete pipe (RCP) storm drain extends from the west site boundary west across Old 215 Frontage Road and discharges into developed land use opposite the roadway from the project site. Runoff from the project site does not enter that storm drain (refer to **Appendix H2**).

The project proposes drainage improvements including storm drains and storm drain inlets, modular wetland systems and underground detention system consisting of plastic pipes. The detention system would outlet to a proposed pump that would pump stormwater up to an existing 24-inch storm drain onsite. The proposed storm drain improvements would limit runoff flow rates from the site at project completion to no greater than existing rates. Therefore, project development would not require construction of new or expanded off-site stormwater drainage facilities.

Electric Power: Moreno Valley Utility (MVU) provides electricity to the project site. During fiscal year 2019/2020 MVU provided approximately 202 gigawatt-hours of electricity to its customers (MVU 2020). The project site is in an urbanized area with existing electric distribution lines. The project would be constructed in accordance with all applicable Title 24 regulations, and project development would not require construction or relocation of electric power facilities. Therefore, a less than significant impact would occur.

Natural Gas: The Southern California Gas Company (SoCalGas) is the primary distributor of retail and wholesale natural gas across Southern California, including the City of Moreno Valley. SoCalGas provides services to residential, commercial, and industrial consumers, and also provides gas for electric generation customers. In its 2020 California Gas Report, SoCalGas analyzed a 16-year demand period, from 2020 to 2035, to determine its ability to meet projected demand (California Gas and Electric Utilities, 2020. p. 93).

SoCalGas expects total gas demand to decline 0.74 percent annually from 2020 to 2035 as a result of energy-efficiency standards and programs, renewable electricity goals, modest economic growth in its service region, and advanced metering infrastructure (California Gas and Electric Utilities, 2018, p. 66). Anticipated natural gas supply is adequate to meet demand in the SoCalGas region, and the proposed project is not expected to impact this determination. Thus, no natural gas facilities would have to be constructed or relocated, and a less than significant impact would occur.

Telecommunications Facilities: Telecommunication services for the project site, including internet, phone, and television, are provided by AT&T, Verizon, Crown Castle, Questar, and Spectrum (digalert.org, 2021). The project construction contractor would contact Underground Service Alert of Southern California ("Digalert") at least two days before beginning soil disturbance, pursuant to California

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Government Code § 4216. Any relocation of underground utilities onsite—or next to the site for installation of new utility laterals connecting to existing utilities—would be conducted at the expense of the project applicant and under permission from the utility's owner. The proposed project would not interfere with operation of existing utility facilities, and impacts would be less than significant.				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

Response:

Less than Significant Impact

The Eastern Municipal Water District (EMWD) supplies water to the project site. EMWD's 555-square-mile service area spans much of western Riverside County (EMWD, 2021). EMWD is the retail water purveyor in most of its service area and also wholesales water to several retail water purveyors in its service area. EMWD water supply in the project region is from northern California imported via the State Water Project (EMWD, 2020).[10]

Water is treated at the Metropolitan Water District's Mills Filtration Plant in the City of Riverside, which has capacity of 220 million gallons per day (MWD, 2021). EMWD retail water supplies are forecast to increase from 115,916 acre-feet per year (afy) in 2020 to 178,700 afy in 2040, as shown below in **Table 35**. Water demands for 2025 through 2040 are based on population projections by the Southern California Association of Governments, which in turn are based on general plan land use projections (EMWD, 2020, p. 3-8). EMWD forecasts that it will have sufficient water supplies to meet demands in its service area through the 2025-2040 period in single-dry-year and multiple-dry-year conditions, as shown below in **Table 36**.

Table 35 - EMWD Systemwide Retail Water Supplies And Demands, Average Water Conditions, Acre-Feet Per Year

Supply Source	2020	2025	2030	2035	2040
Imported water	62,310	66,447	72,147	70,247	74,747
Other potable water supplies[1]	22,362	36,153	36,153	44,153	44,153
Recycled water supply[2]	39,642	43,330	49,020	54,500	59,800
Total Water Supplies	124,314	145,930	157,320	168,900	178,700
Water Demands	115,916	145,930	157,320	168,900	178,700
Difference	8,398	0	0	0	0

[1] Other potable water supplies consist of groundwater from the San Jacinto Groundwater Basin, some of which is desalinated at EMWD desalters, and purified water derived from treated wastewater and used as one of the water sources for recharging the San Jacinto Groundwater Basin.
[2] Non-potable water supplies consist of recycled treated wastewater and brackish groundwater from the San Jacinto Groundwater Basin used to supplement the recycled water system. Quantities shown here are recycled water only.
Source: EMWD, 2021, pp. 6-24 and 6-25.

Table 36 - EMWD Retail Water Supply Reliability, 2025-2040, Acre-Feet Per Year

[10] EMWD imported water supplies, in other portions of its service area, also include water imported from the Colorado River via the Colorado River Aqueduct. EMWD imported water supplies in the project region—approximately the northwest third of EMWD's service area—are only from northern California (EMWD, 2020).

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

	Normal Year		Single Dry Year		Multiple Dry Years[1]	
	Supply	**Demand**	**Supply**	**Demand**	**Supply**	**Demand**
2025	145,390	145,390	151,130	151,130	140 ,200	140 ,200
2030	157,320	157,320	162,820	162,820	150,800	150,800
2035	168,900	168,900	174,700	174,700	160,000	160,000
2040	178,700	178,700	184,700	184,700	168,000	168,000

Notes:
[1]Volumes are for fifth of five consecutive dry years.
Source: EMWD, 2020 Urban Water Management Plan, pp. 7.8-7.10

The proposed truck leasing, sales, and service facility would conform with the existing General Plan land use designation for the project site, Industrial/Business Park. Therefore, water demand by buildout of the project site in accordance with the General Plan designation was accounted for in EMWD's water demand forecasts. EMWD forecasts that it will be able to meet water demands in its service area in normal, single-dry-year, and multiple-dry-year conditions over the 2025-2040 period. Project development would not require EMWD to obtain new or increased water supplies, and impacts would be less than significant.

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

Response:

Less than Significant Impact
As described in Section 4.19 a) above, the volume of wastewater generated by the project represents only a small fraction of the existing daily capacity of the wastewater treatment facility providing service in the area. Therefore, the wastewater anticipated to be generated by the project would be within the existing capacity of the wastewater treatment provider and less than significant impacts would occur.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

Response:

Less than Significant Impact
Waste Management, Inc. collects solid waste from businesses and residents in the City of Moreno Valley under contract with the City.

In 2019, the latest year for which data are available, approximately 97 percent of solid waste landfilled from the City of Moreno Valley was disposed of at two facilities, Badlands Sanitary Landfill near the City of Moreno Valley and El Sobrante Landfill near the City of Corona. As shown below in **Table 37**, the two landfills have combined residual capacity of approximately 6,500 tons per day.

Table 37 - Landfills Serving Moreno Valley

Facility and Nearest City/Community	Remaining Capacity, cubic yards	Daily Permitted Disposal Capacity, tons	Actual Daily Disposal, tons[1]	Residual Daily Disposal Capacity, tons	Estimated Closing Date
Badlands Sanitary Landfill,	15,748,799	4,800	2,955	1,845	2022

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

Moreno Valley, Riverside County					
El Sobrante Landfill, Corona, Riverside County	143,977,170	16,054	11,398	4,656	2051
Total	**159,725,969**	**20,854**	**14,353**	**6,501**	Not applicable

[1] Daily disposal calculated based on annual disposal tonnage assuming 300 operating days per year (i.e., six days per week less certain holidays).
Sources: CalRecycle. 2021a. Jurisdiction Disposal by Facility; CalRecycle. 2020[b and c]. Solid Waste Information System (SWIS): SWIS Facility/Site Search; CalRecycle. 2020d. 2020 Landfill Summary Tonnage Report.

The project is estimated to generate 47 tons of solid waste annually, as shown in **Table 38.** Sufficient landfill capacity is available in the region for estimated project solid waste disposal, and project impacts on solid waste disposal capacity would be less than significant.

Table 38 - Estimated Project Generated Solid Waste

Land Use	Generation Rate[1]	Employees	Waste (tons/year)
Services – Repair and Personal	1.36 (tons/employee/year)	31	47

Notes:
[1]Cal Recycle, 2015. 2014 Generator Based Characterization of Commercial Sector Disposal and Diversion in California. Accessed online at: https://www2.calrecycle.ca.gov/WasteCharacterization/PubExtracts/2014/GenSummary.pdf on February 18, 2019.

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

Response:

Less than Significant Impact

Assembly Bill 341 (AB 341; Chapter 476, Statutes of 2011) increases the statewide waste diversion goal to 75 percent by 2020, and mandates recycling for commercial and multi-family residential land uses. The project would include storage areas for recyclable materials in accordance with AB 341.

Assembly Bill 1826 (AB 1826; California Public Resources Code §§ 42649.8 et seq.) requires recycling of organic matter by businesses and multifamily residences of five of more units generating such wastes in amounts over certain thresholds. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. Multifamily residences are not required to have a food waste diversion program. The project does not propose uses that would generate substantial amounts of food waste, such as grocery retailing or restaurant use. The project would include approximately 1.51 acres of landscaping; landscaping waste would be composted in accordance with AB 1826.

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of the 2019 California Green Building Standards Code (CALGreen; Title 24, California Code of Regulations, Part 11) requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

Project construction and operation would comply with state and local laws requiring solid waste diversion, and no adverse impact would occur.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, **would the project:**				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Response:

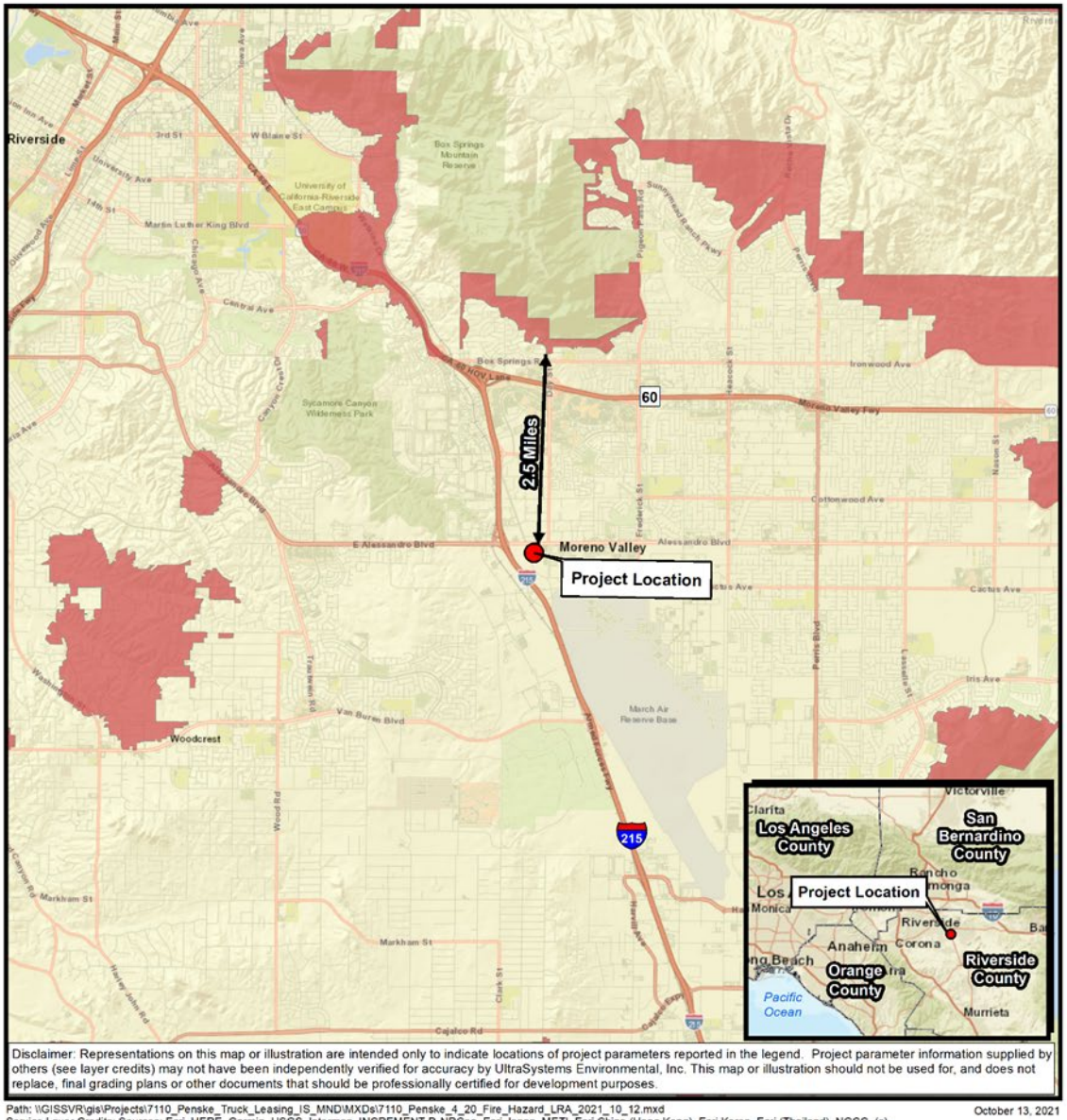
As shown in **Figure 29,** the project site is not located in or near a State Responsibility Area (SRA), that is, where the State is responsible for the costs of wildfire prevention and suppression (CAL FIRE, 2021). As shown in

Figure 30, the project site is not in a very high fire hazard severity zone (VHFHSZ) in a Local Responsibility Area (LRA)—where cities and counties are responsible for the costs of wildfire prevention and suppression (CALFIRE, 2020). The City of Moreno Valley contains areas classified as very high fire hazard severity zones (VHFHSZ) in LRA, which are located approximately 4.5 miles northeast and 5.5 miles southeast of the project site. (CAL FIRE, 2021).

Less than Significant Impact

The project site is not located in or near SRAs or lands classified as VHFHSZs. The City of Moreno Valley Wildfire Mitigation Plan 2021 (MVWMP) states that interstates would serve as major emergency response and evacuation routes (City of Moreno Valley, 2021). The MVWMP identifies numerous City plans to address disaster management (City of Moreno Valley, 2021). Since the project is not located in an SRA or LRA and development near LRAs and VHFHSZs has been accounted for in the City's safety plans, project development would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (City of Moreno Valley, 2021). A less than significant impact would occur.

Figure 29 - Fire Hazard Severity Zone - Local Responsibility Area



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\GISSVR\gis\Projects\7110_Penske_Truck_Leasing_IS_MND\MXDs\7110_Penske_4_20_Fire_Hazard_LRA_2021_10_12.mxd October 13, 2021

Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community; Cal Fire, November 2020; UltraSystems Environmental, Inc., 2021

Scale: 1:95,040

N

0 0.75 1.5 Miles

0 0.75 1.5 Kilometers

Legend

Project Location

Fire Hazard Severity Zones in LRA

Very High

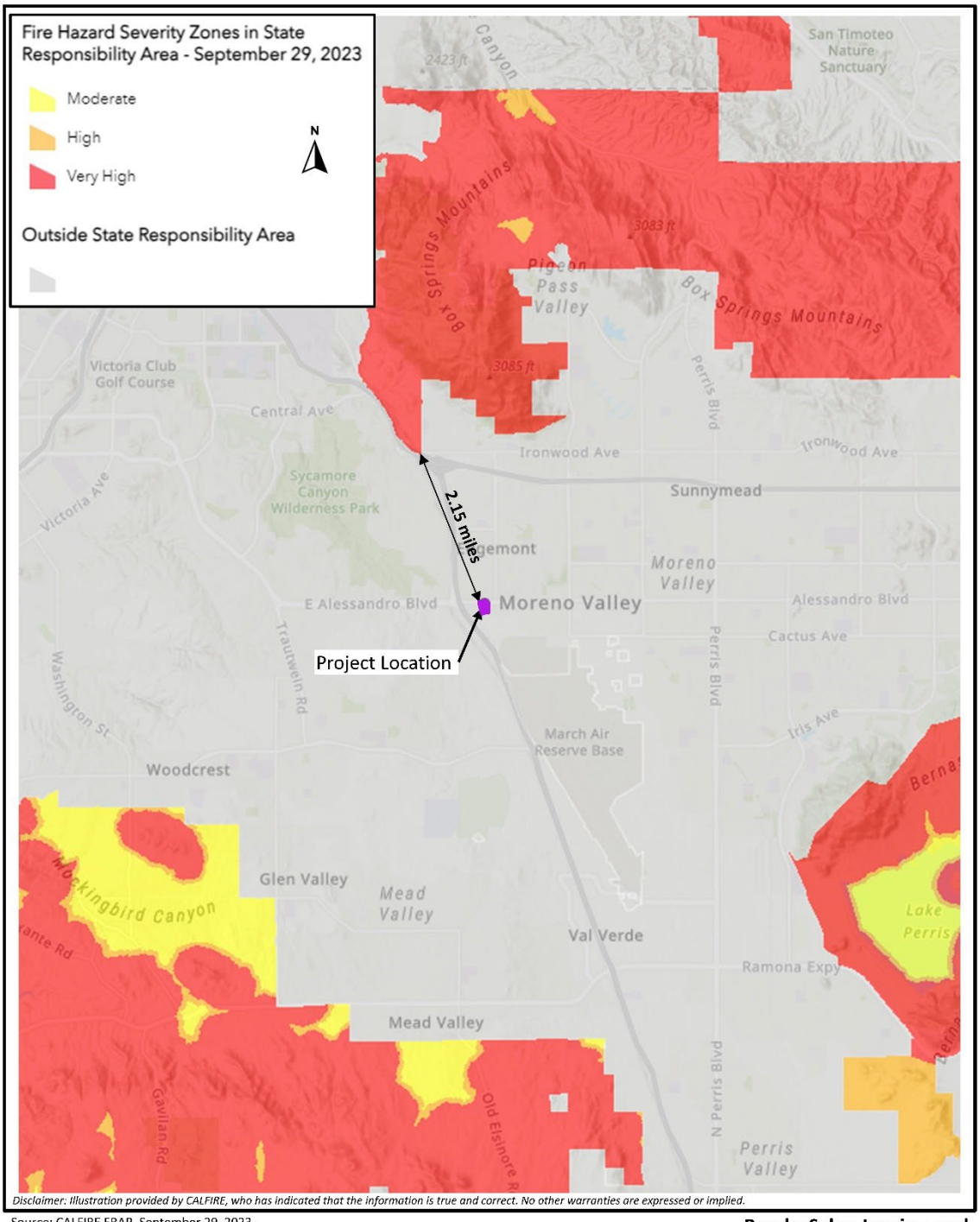
Penske Sales, Leasing, and Maintenance Facility

Fire Hazard Severity Zone
Local Responsibility Area (LRA)

UltraSystems

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

Figure 30 - Fire Hazard Severity Zone - State Responsibility Area



Disclaimer: Illustration provided by CALFIRE, who has indicated that the information is true and correct. No other warranties are expressed or implied.

Source: CALFIRE FRAP, September 29, 2023.

Penske Sales, Leasing, and Maintenance Facility

Fire Hazard Severity Zone
State Responsibility Area (SRA)

UltraSystems
environmental • management • planning

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant	☐	☐	☒	☐

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
concentrations from a wildfire or the uncontrolled spread of a wildfire?				

Response:

Less than Significant Impact
The project site is not located in or near areas or lands classified as VHFHSZs. No slopes are located on the project site which could exacerbate wildfire risks. Therefore, project development would not expose persons onsite to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. A less than significant impact would occur.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

Response:

No Impact
The project site is not located in or near an SRA or an LRA Fire Hazard Severity Zone. Project development would involve the installation and maintenance of infrastructure that would be onsite and would connect to existing underground mains in surrounding roadways. Such installation and maintenance would not exacerbate fire risks or cause substantial environmental impacts. No impact would occur.

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

Response:

No Impact
The project site is not located in or near an SRA or an LRA Fire Hazard Severity Zone. In addition, the project site and surrounding areas are in an urban area with relatively flat terrain. Project development would not exacerbate wildfire risks and thus would not expose people or structures to risks subsequent to wildfires such as flooding or landslides. No impact would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Response:

Less than Significant Impact with Mitigation
In the Biological Resources section of the document discusses the impact on Biological Resources. The project site is located within the Reche Canyon/Badlands Area Plan of the MSHCP. The western edge of the project area is within the Lake Matthews/Woodcrest Area Plan; however, it does not fall within any criteria cells, conservation areas, wildlife movement corridors, or linkages.

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

The project site lacks suitable habitat or is outside the elevation or geographic range of all except one special-status plant species, Santa Ana River woollystar, documented in the plant inventory. The Santa Ana River woolly star has a low potential to occur on the project site. During the surveys, no special-status plant species were observed, including the Santa Ana River woollystar.

The Biological Study Area (BSA) contains large trees and other physical features that could potentially provide foraging, nesting, and cover habitats to support a diverse assortment of bird species. Most birds observed during field surveys and birds that could potentially breed within the BSA are protected by the MBTA and the Fish and Game Codes 3503, 3503.5, and 3513.

The Monarch butterfly was determined to have a moderate potential to occur on the project site, but was not observed during the surveys and does not appear to reside permanently within the BSA.
The California horned lark was observed on the project site during a survey on September 21, 2021. However, the individual only landed briefly and did not exhibit nesting or foraging behavior; this occurrence was determined to be the result of passage.

Special-status plants and wildlife are not expected to occur within the BSA, and thus impacts are expected to be less than significant. Implementing mitigation measures **BIO-1** and **BIO-2** will further minimize or avoid impacts on species of special-status plants and wildlife to a level that is less than significant.

The construction of the project would result in permanent filling of the vernal pools on site, as defined by the MSHCP. Therefore, development of the project would have a direct impact on vernal pools and associated species. Jurisdictional features, as discussed in **Biological Resources**, are anticipated to be directly impacted as a result of the project on state or federally protected wetlands. To compensate for the significant impacts resulting from the permanent loss of vernal pools, the project will implement mitigation measure **BIO-3**.

The implementation of the recommended mitigation measures **BIO-1** thorough **BIO-3** detailed in **Biological Resources** would reduce the potential impacts of the project on biological resources to a less than significant level.

In the Cultural Resources section of this document addresses potential impacts on Cultural Resources. Based on the Cultural Resources' records search, it was determined that no historic cultural resources have been previously recorded within the project site boundary. Within the 0.5-mile buffer zone, there has been one prehistoric archaeological site and 12 previously recorded cultural resources of the historic era. The pedestrian survey of the project site was observed in the area along Alessandro Boulevard east of the project site, and all these structures had been demolished and removed. The result of the pedestrian survey was negative for both prehistoric and historic sites. Based on the results of the records search, tribal consultation, and the onsite field survey it is unlikely that cultural resources or tribal resources would be adversely affected by the construction of the project. However, grading activities associated with the development of the project would cause new subsurface disturbances and could potentially result in the unanticipated discovery of archaeological resources or human remains.

With the implementation of the recommended mitigation measures **CUL-1**through **CUL-5** detailed in **Cultural Resources**, the potential impact of the project on important examples of the major periods of California history or prehistory regarding the unanticipated discovery of archaeological resources or human remains would be reduced to a less than significant level.

In the Geology and Soils section of this document addresses potential impacts on Geology and Soils. The development of the project would involve soil and sediment disturbance for the construction of buildings, parking lots, underground storage tanks, and other improvements. Such disturbances could damage fossils that may be present in the sediments of the site. This impact would be potentially significant. In the event of an unexpected discovery, the implementation of mitigation measure **GEO-1** detailed in **Geology and Soils** would reduce the potential impacts on important examples of the major periods of California history or prehistory regarding the unexpected discovery of paleontological resources or unique geological resources to a less than significant level.

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

In the **Tribal Cultural Resources section** of this document addresses the potential impact on Tribal Cultural Resources (TCR). Mitigation to minimize potential impacts on TCR is applicable to the project site because the land on the site was used for agriculture in the past and vehicle storage in recent years, resulting in considerable surface disturbance of native soil by grading. Therefore, the potential for cultural and historical deposits in the subsurface is considered moderate. The implementation of mitigation measure **TCR-1** detailed in **Tribal Cultural Resources** would reduce potential impacts to a less than significant level by requiring the consultation of a qualified archaeologist and the local Native American representative if unanticipated discoveries are made during construction activities.

Because the project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community after mitigation measures are incorporated, the incremental contribution to cumulative impacts is expected to be less than significant when mitigation measures are incorporated.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.)?	☐	☐	☒	☐

Response:

Less than Significant Impact

The proposed project would be consistent with regional plans and programs that address environmental factors such as air quality, water quality, and other applicable regulations that have been adopted by public agencies with authority over the project to avoid or mitigate environmental effects.

The **Air Quality section** of this document addresses potential impacts on Air Quality; the **Greenhouse Gas Emissions** section addresses potential impacts on Greenhouse Gas Emissions, in the **Noise section** of this document addresses the potential impacts of Noise, and the **Hydrology and Water Quality** section addresses potential impacts on Hydrology and Water Quality. The potential impacts associated with the construction and operation of the project in terms of air quality, water quality, and other applicable regulations would be less than significant and do not warrant mitigation.

Individual limited impacts were found to be less than significant and do not warrant mitigation. As a result, the additional contribution to cumulatively considerable impacts is expected to be less than significant.

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

Response:

Less than Significant Impact with Mitigation

The Hazards and Hazardous Materials section of this document addresses the potential impacts of Hazards and Hazardous Materials. Due to the past use of the project site for agricultural purposes, there is a potential for soil contamination from agricultural land uses. A Phase I Environmental Site Assessment (ESA) and a Limited Phase II Environmental Site Investigation (ESI) were completed for the project site. The purpose of the ESA and the ESI was to identify recognized environmental conditions for the project site. These include: 1) presence or likely presence of hazardous substances or petroleum products on the site, 2) conditions that indicate an existing release, past release, or a material threat of a release of hazardous substances or petroleum products into structures, ground, groundwater, or surface water of the Subject Property (GHD, 2021, p. 1). The ESA/ESI determined that the three recognized environmental conditions (REC) described in **Hazards and Hazardous Materials** could affect the site.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
To minimize potential impacts to those encountering and handling subsurface soils during project construction, mitigation measures **HAZ-1** and **HAZ-2** would be implemented. With the implementation of the mitigation measures **HAZ-1** and **HAZ-2,** the possible impacts associated with the handling of subsurface soils during the construction of the project would be less than significant. As discussed in the **Aesthetics** through **Wildfire** sections of this document, after the implementation of mitigation measures, it was established that the potential adverse environmental impact on humans, either directly or indirectly, would be less than significant.				

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