CITY OF MORENO VALLEY

MITIGATED NEGATIVE DECLARATION FOR THE COMPASS DANBE CENTERPOINTE PROJECT

General Plan Amendment (PEN20-0118)
Change of Zone (PEN20-0119)
Tentative Parcel Map No. 37944 (PEN20-0120)
Plot Plan (PEN20-0121 & PEN20-0124)

July 2021

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

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MITIGATED NEGATIVE DECLARATION FOR COMPASS DANBE CENTERPOINTE PROJECT

Project Description:
The Compass Danbe Centerpointe project comprises a proposal for a General Plan Amendment (PEN20-0118); Change of Zone (PEN20-0119); Tentative Parcel Map No. 37944 (PEN20-0120); and two Plot Plans (PEN20-0121 and PEN20-0124) that provide for the development of an approximately 17.7-acre property with two light industrial buildings with a total combined building floor area of 389,603 square feet. The Project also would include cargo loading areas at each building (within an enclosed truck court with loading docks on the south sides of the proposed buildings), parking areas, landscaping, signage, and lighting.

Project Location:
The Project site is located south of Alessandro Boulevard, between Frederick Street and Graham Street, in the City of Moreno Valley, Riverside County, California (APNs: 297-170-002 and -003).

Project Proponent:
Mark Bachli
CDRE Holdings 17 LLC
523 Main Street
El Segundo, CA 90245

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

Mitigation Measures:

No.	Mitigation Measure
BR-1	Within 30 days prior to grading, a qualified biologist shall conduct a survey of suitable habitat on site and make a determination regarding the presence or absence of the burrowing owl. The determination shall be documented in a report and shall be submitted, reviewed, and accepted by the City of Moreno Valley prior to the issuance of a grading permit and subject to the following provisions: a) In the event that the pre-construction survey identifies no burrowing owls on the property a grading permit may be issued without restriction. b) In the event that the pre-construction survey identifies the presence of at least one individual but less than three (3) mating pairs of burrowing owl, then prior to the issuance of a grading permit and prior to the commencement of ground-disturbing activities on the property, the qualified biologist shall passively or actively relocate any burrowing owls. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit. c) In the event that the pre-construction survey identifies the presence of three (3) or more mating pairs of burrowing owl, the requirements of MSCHP Species-

No.	Mitigation Measure
	Specific Conservation Objectives 5 for the burrowing owl shall be followed. Objective 5 states that if the site (including adjacent areas) supports three (3) or more pairs of burrowing owls and supports greater than 35 acres of suitable habitat, at least 90 percent of the area with long-term conservation value and burrowing owl pairs will be conserved onsite until it is demonstrated that Objectives 1-4 have been met. A grading permit shall be issued, either: i) Upon approval and implementation of a property-specific Determination of Biologically Superior Preservation (DBESP) report for the burrowing owl by the CDFW; or ii) A determination by the biologist that the site is part of an area supporting less than 35 acres of suitable Habitat, and upon passive or active relocation of the species following accepted CDFW protocols. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit.
BR-2	All vegetation clearing and ground disturbance shall be prohibited during the bird nesting season (February 1 through September 15), unless a nesting bird survey is completed in accordance with the following requirements: a) A bird nesting survey of the Project Site, including suitable habitat within a 100-foot radius, shall be conducted by a qualified biologist within five (5) days prior to initiating vegetation clearing or ground disturbance at the respective property. A copy of the nesting bird survey results report shall be provided to the City of Moreno Valley. b) If the survey does not identify the presence of any active nests, then construction activities can proceed without restriction. c) If the survey identifies the presence of active nests, then the qualified biologist shall provide the City with a copy of maps showing the location of all nests and a species-appropriate buffer zone around each nest sufficient to protect the nest from substantial adverse direct and/or indirect impacts. The size and location of all buffer zones, if required, shall be subject to review and approval by the City but shall be no less than a 100-foot radius around the nest for non-raptor species and no more than a 500-foot radius around the nest for raptor species and any endangered, threatened, or candidate species. i) The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing. No construction vehicles shall be permitted within restricted areas (i.e., bird protection zones), unless directly related to the management or protection of the legally protected species, until after the nest becomes inactive (or the nest has failed), 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 the activities. ii) In the event that a nest is abandoned despite efforts to minimize disturbance and, if the nestlings are still alive, the Project Applicant/Developer shall contact the California Department of Fish and

No.	Mitigation Measure
	Wildlife (CDFW) and, subject to CDFW approval, fund the recovery and hacking (controlled release of captive reared young) of the nestling(s).
BR-3	Prior to the issuance of grading permits, the Project Applicant shall obtain all applicable permits for impacts to jurisdictional features, which may include a 1602 Streambed Alteration Agreement from CDFW and a 401 Certification issued by the RWQCB pursuant to the California Water Code Section 13260. In addition, the Project Applicant shall purchase a minimum of 0.81-acre of re-establishment credits (a 1:1 mitigation-to-impact ratio for impacts to wetland meadow habitat) and 0.82-acre of rehabilitation credits (a 2:1 mitigation-to-impact ratio for impacts to black willow riparian woodland and disturbed wetland-cattail habitats). Habitat mitigation credits can be purchased either at an approved Habitat Mitigation Bank (e.g., Riverpark Mitigation Bank) or via an In-Lieu Fee Program (e.g., Riverside-Corona Resource Conservation District and the Southwest Resource Management Association Santa Ana River Watershed In-Lieu Fee Program). Approval to purchase the mitigation credits must be granted in advance by the resource agencies. The Project Applicant shall provide evidence to the City of Moreno Valley that the applicable permits have been obtained and that the required habitat mitigation credits have been purchased prior to issuance of grading permits.
GEO-1	Prior to the issuance of a grading permit, the Project Applicant shall provide evidence to the City of Moreno Valley that a qualified paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.
GEO-2	The paleontological monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at depths exceeding five feet below the existing ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontological monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified paleontological personnel to have a low potential to contain or yield fossil resources.
GEO-3	Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the Western Science Museum in Hemet, California, is required for significant discoveries.
GEO-4	A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Moreno Valley prior to building final.
TCR-1	Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all mass grading and trenching activities. The Project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a Cultural Resources Management Plan (CRMP) in consultation pursuant to the definition in

No.	Mitigation Measure
	AB52 to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting tribe is defined as a tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB52 consultation process, and has completed AB 52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include: a) Project grading and development scheduling; b) The Project archeologist and the Consulting Tribes(s) as defined in MM TCR-1 shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The 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 and Consulting Tribe(s) shall make themselves available to provide the training on an as-needed basis; c) The protocols and stipulations that the contractor, City, Consulting Tribe(s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.
TCR-2	Prior to the issuance of a grading permit, the Developer shall secure agreements with the Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians for tribal monitoring. The Developer is also required to provide a minimum of 30 days advance notice to the tribes of all mass grading and trenching activities. The Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological resources are unearthed. If the Native American Tribal Representatives suspect that an archaeological resource may have been unearthed, the Project Archaeologist or the Tribal Representatives shall immediately redirect grading operations in a 100-foot radius around the find to allow identification and evaluation of the suspected resource. In consultation with the Native American Tribal Representatives, the Project Archaeologist shall evaluate the suspected resource and make a determination of significance pursuant to California Public Resources Code Section 21083.2.
TCR-3	In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries: a) One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Moreno Valley Planning Division: 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.

No.	Mitigation Measure
	ii. Onsite reburial of the discovered items as detailed in the treatment plan required pursuant to MM TCR-1. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed. No recordation of sacred items is permitted without the written consent of all Consulting Native American Tribal Governments as defined in MM TCR-1.
TCR-4	The City shall verify that the following note is included on the Grading Plan: "If any suspected archaeological resources are discovered during ground-disturbing activities and the Project Archaeologist or Native American Tribal Representatives are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Tribal Representatives to the site to assess the significance of the find."
TCR-5	If potential historic or cultural resources are uncovered during excavation or construction activities at the project site, work in the affected area must cease immediately and a qualified person meeting the Secretary of the Interior's standards (36 CFR 61), Tribal Representatives, and all site monitors per the Mitigation Measures, shall be consulted by the City to evaluate the find, and as appropriate recommend alternative measures to avoid, minimize or mitigate negative effects on the historic, or prehistoric resource. Determinations and recommendations by the consultant shall be immediately submitted to the Planning Division for consideration, and implemented as deemed appropriate by the Community Development Director, in consultation with the State Historic Preservation Officer (SHPO) and any and all Consulting Native American Tribes as defined in MM TCR-1 before any further work commences in the affected area.
TCR-6	If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the "most likely descendant". The "most likely descendant" shall then make recommendations, and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98).

Attachments:

1. Initial Study
2. Mitigation Monitoring and Reporting Program

INITIAL STUDY (IS) FOR COMPASS DANBE CENTERPOINTE PROJECT

BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. **Project Case Number(s):** General Plan Amendment (PEN20-0118); Change of Zone (PEN20-0119); Tentative Parcel Map No. 37944 (PEN20-0120); and Plot Plans (PEN20-0121 and PEN20-0124)

2. **Project Title:** Compass Danbe Centerpointe

3. **Public Comment Period:** July 26, 2021 to August 25, 2021

4. **Lead Agency:** City of Moreno Valley
   Julia Descoteaux, Associate Planner
   14177 Frederick Street
   Moreno Valley, CA 92552
   (951) 413-3209
   juliad@moval.org

5. **Documents Posted At:**
   a. City of Moreno Valley Planning Division Counter, 14177 Frederick Street, Moreno Valley, CA 92553
   b. Moreno Valley Library, 25480 Alessandro Boulevard, Moreno Valley, CA 92553
   c. City's website: http://www.moreno-valley.ca.us/cdd/documents/about-projects.html

6. **Prepared By:** T&B Planning, Inc.
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7. **Project Sponsor:**

Applicant/Developer
Mark Bachli
CDRE Holdings 17, LLC
523 Main Street
El Segundo, CA 90245

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mbachli@danbe.com

Property Owner
Vir Prabhu Dhalla
Moreno Valley Centerpointe, LLC
(c/o CDRE Holdings 17, LLC)
523 Main Street
El Segundo, CA 90245
(310) 428-3302
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8. **Project Location:** The Project site is located in the central-western portion of the City of Moreno Valley, Riverside County, California. The Project site is located south of Alessandro Boulevard, between Frederick Street and Graham Street (APNs: 297-170-002 and -003). Refer to Figure 1, *Regional Map*; Figure 2, *Vicinity Map*; and Figure 3, *USGS Topographic Map*.

9. **General Plan Designation:** Commercial. Refer to Figure 4, *Existing General Plan.*

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

11. **Existing Zoning:** Community Commercial. Refer to Figure 5, *Existing Zoning*.

12. **Surrounding Land Uses and Setting** (Refer to Figure 6, *Aerial Photograph* and Figure 7, *Site Photographs*)**:**

	Land Use	General Plan	Zoning
Project Site	**Undeveloped**	**Commercial**	**Community Commercial**
North	Residential	Residential: Max 5 du/ac; Residential: Max 20 du/ac	Residential 5; Residential 20
South	Industrial	Business Park/Light Industrial	Light Industrial
East	Commercial and Undeveloped	Business Park/Light Industrial; Commercial	Business Park-Mixed Use; Community Commercial
West	Undeveloped	Commercial	Community Commercial with Mixed-Use Institutional Anchor Overlay

13. **Project Description:** The Compass Danbe Centerpointe project (hereafter, "Project") comprises a proposal for a General Plan Amendment (PEN20-0118); Change of Zone (PEN20-0119); Tentative Parcel Map No. 37944 (PEN20-0120); and Plot Plans (PEN20-0121 and PEN20-0124) that provides for the development of two light industrial buildings located south of Alessandro Boulevard, between Frederick Street and Graham Street. The components of the proposed Project are summarized on the following pages.

General Plan Amendment (PEN20-0118) would amend the City of Moreno Valley General Plan Land Use Map to change the land use designation for the entire Project site from "Commercial" to "Business Park/Light Industrial." Refer to Figure 8, *General Plan Amendment (PEN20-0118)*.

Change of Zone (PEN20-0119) would amend the City of Moreno Valley Zoning Map to change the zoning designation for the entire Project site from "Community Commercial" to "Light Industrial." Refer to Figure 9, *Change of Zone (PEN20-0119)*.

Tentative Parcel Map No. 37944 (PEN20-0120) would relocate the existing property line so that Building 1 and Building 2 would be placed upon separate parcels and, also, would grant various easements for public access (i.e., public sidewalks) and public utilities. Refer to Figure 10, *Tentative Parcel Map No. 37944 (PEN20-0120)*.

Plot Plans (PEN20-0121 and PEN20-0124) provide specific development plans for two industrial warehouse buildings (Buildings 1 and 2). Building 1, located on the western portion of the Project site, contains approximately 290,726 square feet (s.f.) of building floor area, including 280,726 s.f. of warehouse space, 5,000 s.f. of office space, and 5,000 s.f. of mezzanine. Building 2, located on the eastern portion of the Project site, contains approximately 98,877 s.f. of building floor area, including 93,77 s.f. of warehouse space, 2,500 s.f. of office space, and 2,500 s.f. of mezzanine. The total combined building floor area for Building 1 and Building 2 is approximately 389,603 s.f. Both buildings include outdoor employee break areas with tables and seating; provided along the eastern side of Building 1 and along the western side of Building 2. The site plan for the Project is illustrated on Figure 11, *Site Plan*.

Vehicular access to the Project site is provided by three proposed driveways onto Alessandro Boulevard. The middle driveway would be accessible to only passenger vehicles and the westernmost driveway and easternmost driveway would be accessible to both passenger vehicles and trucks. All driveways would be restricted to right turn movements when entering/exiting the site. Sight distance at each Project driveway will be reviewed by the City of Moreno Valley at the time of preparation of final grading, landscape and street improvement plans to ensure that standard Caltrans and City of Moreno Valley sight distance standards are met.

Parking and Loading

The Project provides a range of parking and loading options across the Project site. Buildings 1 and 2 both provide enclosed truck courts on the south sides of the respective buildings. The truck court for Building 1 includes 32 loading bays and 34 truck trailer parking stalls; the truck court for Building 2 includes 10 loading bays and 10 truck trailer parking stalls. Neither truck court would be visible from Alessandro Boulevard. Building 1 also provides 144 passenger vehicle parking spaces (distributed along the north and east side and southeast corner of the building) while Building 2 provides 73 passenger vehicle parking spaces along the north and west sides and southeast corner of the building). Bicycle parking spaces ("racks") would be provided at the northeast corners of Building 1 (4 racks) and Building 2 (2 racks) in conformance with Moreno Valley Municipal Code Section 9.11.060(B)(1) which requires bicycle parking spaces be provided at a rate equal to five percent of the total required parking spaces.

Architecture

Figure 12, *Architectural Elevations*, depicts the Project's architectural design. Building 1 would have a maximum height of approximately 46 feet (measured from finished floor to the top of the parapets) and Building 2 would have a maximum height of approximately 46 feet (measured from finished grade to the top of the parapets). Both buildings are proposed to be constructed with painted concrete tilt-up panels and low reflective, blue-glazed glass. Articulated building elements, include parapets with a varied roofline, wall recesses, awnings, and mullions are proposed as decorative elements. The exterior color palette for Buildings 1 and 2 are comprised of various neutral, earth-toned colors, including shades of white, beige, gray, and dark brown.

Prior to the issuance of building permits to construct the Project, the Project Applicant would be required to submit construction architecture documents/plans to the City of Moreno Valley for review and approval. The construction documents/plans would be required to comply with the City of Moreno Valley Building Code, which is based on the California Building Code and is included in Chapter 8.20 of the City of Moreno Valley Municipal Code.

Landscaping

Figure 13, *Conceptual Landscape Plan*, depicts the proposed landscape design for the Project. Proposed landscaping would be ornamental in nature and would feature trees, shrubs, and drought-tolerant accent plants in addition to a variety of groundcovers. Trees and groundcover would be concentrated along the Project site's frontage with Alessandro Boulevard and along the Project site's eastern and western boundaries. Landscaping also is massed at driveways, around the buildings, and in and around automobile parking areas.

Prior to the issuance of a building permit to construct the proposed building, the Project Applicant would be required to submit final planting and irrigation plans to the City of Moreno Valley for review and approval. The plans are required to comply with Chapter 9.17 of the Moreno Valley Municipal Code, which establishes requirements for landscape design, automatic irrigation system design, and water-use efficiency.

Project Improvements

Public Roadway Improvements

The Project includes the following public roadway improvements in conjunction with development of the Project site:

1. The Project Applicant would improve the south side of Alessandro Boulevard to its ultimate half-section width as a Divided Major Arterial along the Project site's frontage. With proposed improvements, the south side of the street would feature: a 55-foot-wide travel way (including the existing raised median), new curb and gutter, a 6-foot-wide sidewalk abutting the curb, and a bioretention swale.

2. The Project Applicant would construct three driveways along the northern Project site boundary onto Alessandro Boulevard (which would require striping for lane transitions).

3. The Project Applicant would remove an existing bus stop along the south side of Alessandro Boulevard at the approximate midpoint of the northern Project site boundary. The bus stop would not be replaced as the Project site does not meet City's design requirements for a bus stop (the City's standard for bus stops/turnouts is at the far side of an intersection near a controlled crosswalk, not mid-block which is where the Project site is located).

Water Infrastructure

Eastern Municipal Water District (EMWD) would provide water service to the Project site. As depicted on Figure 14, numerous connection points are proposed to the existing water line installed beneath Alessandro Boulevard for indoor, outdoor (i.e., landscape irrigation), and fire protection (i.e., fire hydrant) services. All proposed water facilities would be designed and constructed in accordance with EMWD standards.

Sanitary Sewer Service

EMWD would provide wastewater conveyance services to the Project site. As shown on Figure 14, the Project would connect to the existing sewer line beneath the southern Project site boundary. All proposed wastewater facilities would be designed and constructed in accordance with EMWD's standards.

Stormwater Drainage Infrastructure

As shown in Figure 14, *Conceptual Drainage Plan*, the Project's on-site stormwater drainage system would consist of catch basins, underground storm drain pipes, bioretention swales, two underground detention basins, two modular wetlands units, and two sump pumps. Runoff from the proposed Building 1 area would drain to a proposed underground detention system located in the southwest corner of the Project site, which would then be pumped to a proposed modular wetlands unit for water quality treatment purposes. Flows would then be conveyed westerly and then southerly via an existing 54-inch storm drain beneath the southwest corner of the Project site. Runoff from the proposed Building 2 area of the Project site would drain to a proposed underground detention system located in the southeast corner of the Project site, which would then be pumped to another proposed modular wetlands unit before being conveyed easterly to an existing 36-inch storm drain beneath the southeast corner of the Project site.

The Project also includes connections to the existing storm drain beneath Alessandro Boulevard to convey storm drain runoff from off-site tributary areas to the north through the Project site. Stormwater runoff from Alessandro Boulevard also would be conveyed through the Project site – after flowing through proposed bioretention swales abutting Alessandro

Boulevard. Off-site runoff flows conveyed through the Project site would discharge to existing storm drains at the southwest and southeast corners of the Project site.

Dry Utilities

Implementation of the Project would result in the installation of conduit for communications cabling along the Project site's frontage with Alessandro Boulevard. Existing wooden power poles along the Project site would be removed as part of Project construction and the overhead electric transmission lines suspended on these poles would be undergrounded. The removal of the power pokes and the undergrounding of the transmission lines would be performed in coordination with Moreno Valley Utility.

Earthwork and Grading

Physical disturbances necessary to implement the Project include grading of the entire Project site. As shown on Figure 15, *Conceptual Grading Plan*, the proposed Project would result in approximately 30,500 cubic yards of cut and 26,000 cubic yards of fill. Based on the expected shrinkage and compaction of on-site soils, earthwork activities are expected to balance and no import or export of soil materials would be required. When grading is complete, the Project site would have a slight downward slope from north to southeast. No manufactured slopes and no retaining walls are needed to implement the Project.

Construction Characteristics

Based on information provided by the Project Applicant, the Project is expected to be constructed over a period of approximately 190 work days (8 months). Site preparation would occur first, followed by mass-grading and installation of underground infrastructure. Next, fine grading would occur, surface materials would be poured, and the proposed building would be erected, connected to the underground utility system, and painted. Lastly, landscaping, fencing, screen walls, lighting, signage, and other site improvements would be installed. For purposes of analysis in this MND, construction is assumed to commence in October 2021 and finish in June 2022. The estimated Project construction schedule, organized by construction stage, is summarized in Table 1, *Estimated Construction Schedule*.

Table 1: Estimated Construction Schedule

Phase Name	Start Date	End Date	Days
Site Preparation	10/04/2021	10/15/2021	10
Grading	10/16/2021	11/26/2021	30
Building Construction	11/27/2021	06/24/2022	150
Paving	05/28/2022	06/24/2022	20
Architectural Coating	05/01/2022	06/24/2022	40

Source: (Urban Crossroads, 2020a, Table 3-2)

Construction workers would travel to the site by passenger vehicle and materials deliveries would occur by medium- and heavy-duty trucks. Construction equipment is expected to operate on the Project site up to eight hours per day, six days per week. Even though construction activities are permitted to occur between 7:00 a.m. to 8:00 p.m. on Mondays through Saturdays pursuant to Moreno Valley Municipal Code Section 11.80.030(D)(7), construction equipment is not in continual use and some pieces of equipment are used only periodically throughout a typical day of construction. Thus, eight hours of daily use per piece of equipment is a reasonable assumption. Should construction activities need to occur at night (such as concrete pouring activities which benefit from air temperatures that are lower than daytime temperatures), the Project Applicant would be required to obtain authorization

for nighttime work from the City of Moreno Valley as specified in Moreno Valley Municipal Code Section 11.80.030(D)(7).

The composition of the construction equipment fleet that the Project Applicant intends to use to construct the warehouse building, which also is used for purposes of analysis is in this IS/MND, is summarized in Table 2, *Estimated Construction Equipment Fleet*.

Table 2: Estimated Construction Equipment Fleet

Phase Name	Equipment	Amount	Hours Per Day
Site Preparation	Crawler Tractors	4	8
	Rubber Tired Dozers	3	8
	Water Trucks	1	4
Grading	Crawler Tractors	2	8
	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
	Water Trucks	1	4
Building Construction	Cranes	1	8
	Forklifts	3	8
	Generator Sets	1	8
	Tractors/Loaders/Backhoes	3	8
	Welders	1	8
	Water Trucks	1	4
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
	Water Trucks	1	4
Architectural Coating	Air Compressors	1	8

Source: (Urban Crossroads, 2020a, Table 3-3)

Operational Characteristics

At this time, the future occupant(s) of the Project is unknown. The Project Applicant expects that the building primarily would be occupied by warehouse distribution operators. The proposed buildings are designed with the potential to utilize up to 30 percent of their floor area for cold storage or refrigerated uses. The Project is expected to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. Lighting would be subject to compliance with Moreno Valley Municipal Code Section 9.08.100, which states that all outdoor lighting associated with nonresidential uses shall be fully shielded and directed away from surrounding residential uses to reduce glare and light trespass, and shall not exceed one-quarter-foot-candle minimum maintained lighting measured from within five (5) feet of any property line.

The proposed warehouse buildings are designed such that business operations would be conducted within the enclosed building, with the exception of traffic movement, parking, and

the loading and unloading of tractor trailers at designated loading bays. As a practical matter, dock doors on industrial buildings are not occupied by a truck at all times of the day. There are typically more dock door positions on industrial buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies. In other words, trucks ideally dock in the position closest to where the goods to be carried by the truck are inside the building. As a result, many dock door positions are frequently inactive throughout the day. The City of Moreno Valley will condition the Project to use outdoor cargo handling equipment (e.g., yard trucks, hostlers, yard goats, pallet jacks, forklifts) that is only powered by non-diesel engines (e.g., gasoline, natural gas, electric).

During operation, employees, visitors, and vehicles hauling goods will travel to and from the Project site on a daily basis. Project operations are calculated by a trip generation calculation study to generate approximately 742 vehicle trips per day, including 518 passenger vehicle trips and 224 truck trips. Pursuant to State law, on-road diesel-fueled trucks that would service the Project are required to comply with various air quality and greenhouse gas emission standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions. Compliance with State law is mandatory and inspections of on-road diesel trucks subject to applicable State laws are conducted by the California Air Resources Board (CARB).

Project operations are expected to demand approximately 9,735 gallons of water per day and 30,090 gallons of wastewater per day (EMWD's standard demand rates for industrial warehouse/distribution land uses are 550 gallons of water per acre per day and 1,700 gallons of wastewater per acre per day, respectively); 5,261,115 kilowatt hours (kWh) of electricity per year; and 6,438,204 kilo-British thermal units (kBTU) of natural gas per year.

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.?**

The City of Moreno Valley is required to consult with interested California Native American tribes regarding the Project pursuant to Assembly Bill 52 (AB 52). The City contacted California Native American Tribes with traditional use areas that encompass or are in the vicinity of the Project site. The Project received requests for consultation from Soboba Band of Luiseno Indians, Pechanga Band of Luiseno Indians, Rincon Band of Luiseno Indians, Agua Caliente Band of Cahuilla Indians, and San Manuel Band of Mission Indians. The City concluded consultation on June 16, 2021.

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

Riverside County Airport Land Use Commission (Airport Land Use Plan Consistency Determination); Santa Ana Regional Water Quality Control Board (NPDES Permit), Riverside County Flood Control and Water Conservation District (drainage infrastructure design); and Eastern Municipal Water District (domestic water and sewer system design/connections).

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

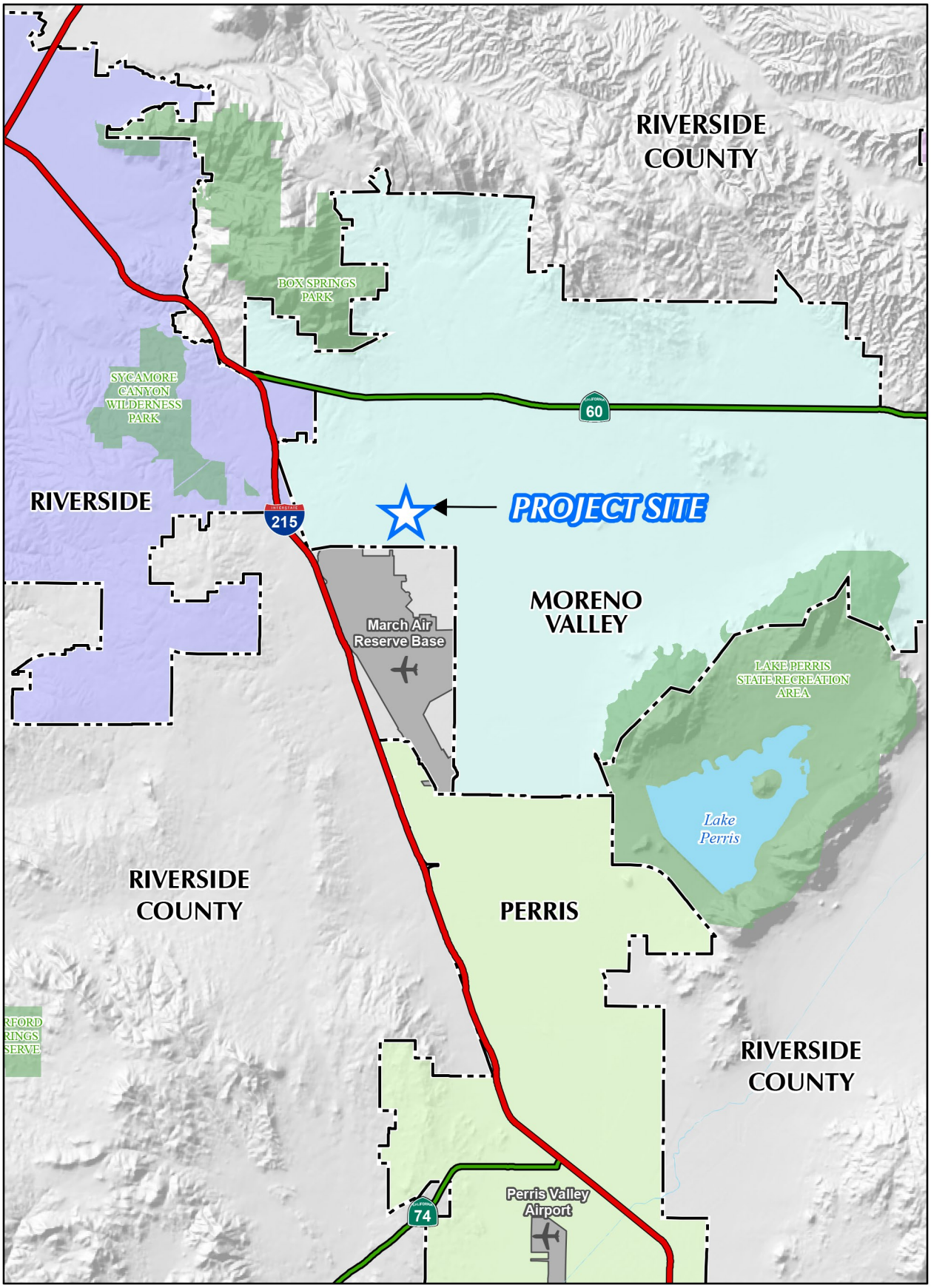
Technical Appendix A1: *Compass Danbe Centerpointe Air Quality Impact Analysis*
Technical Appendix A2: *Compass Danbe Centerpointe Mobile Source Health Risk Assessment*

Technical Appendix B1: *MSHCP General Biological Resources Assessment & Compliance Analysis Alessandro Project Site*
Technical Appendix B2: *Jurisdictional Delineation Report and Impact Analysis Alessandro Project Site*
Technical Appendix B3: *MSHCP Determination of Biologically Equivalent or Superior Preservation Alessandro Project Site*
Technical Appendix B4: *Burrowing Owl Focused Survey Report*
Technical Appendix B5: *Least Bell's Vireo Focused Survey Report*
Technical Appendix C: *Phase I Cultural Resources Survey for the Compass Danbe Centerpointe Project*
Technical Appendix D: *Compass Danbe Centerpointe Energy Analysis*
Technical Appendix E: *Geotechnical Engineering Investigation – Proposed Industrial Warehouse Building Development*
Technical Appendix F: *Compass Danbe Centerpointe Greenhouse Gas Analysis*
Technical Appendix G: *Phase I Environmental Site Assessment Report 17.7 Acres Assessor's Parcel Numbers 297-170-002 and 297-170-003*
Technical Appendix H: *Paleontological Assessment for Compass Danbe Centerpointe Project*
Technical Appendix I1: *Project Specific Water Quality Management Plan Compass Danbe Centerpointe, Industrial Warehouse Facility, South side of Alessandro Blvd. between Frederick Street and Graham Street, City of Moreno Valley*
Technical Appendix I2: *Preliminary Drainage Study Compass Danbe Centerpointe*
Technical Appendix J: *Compass Danbe Centerpointe Noise Impact Analysis*
Technical Appendix K1: *Alessandro Warehouse Traffic Analysis*
Technical Appendix K2: *Alessandro Warehouse Vehicle Miles Travelled (VMT) Analysis*

17. **Acronyms:**

AB-#	Assembly Bill
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AQMP -	Air Quality Management Plan
BMP	Best Management Practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalFire	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CAPSSA	Criteria Area Plant Special Survey Area
CARB	California Air Resources Board
CDC	California Department of Conservation
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CIWMP	Countywide Integrated Waste Management Plan
CO	Carbon Monoxide
CWA	Clean Water Act
dBA	A-weighted decibel
DBESP	Determination of Biologically Equivalent or Superior Preservation
DIF	Development Impact Fee
DOD	Department of Defense
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substance Control
e.g.	exempli gratia meaning "for example"
EAP	Existing plus Ambient Growth plus Project
EDR	EnviroStar database
EIC	Eastern Information Center
EMWD	Eastern Municipal Water District

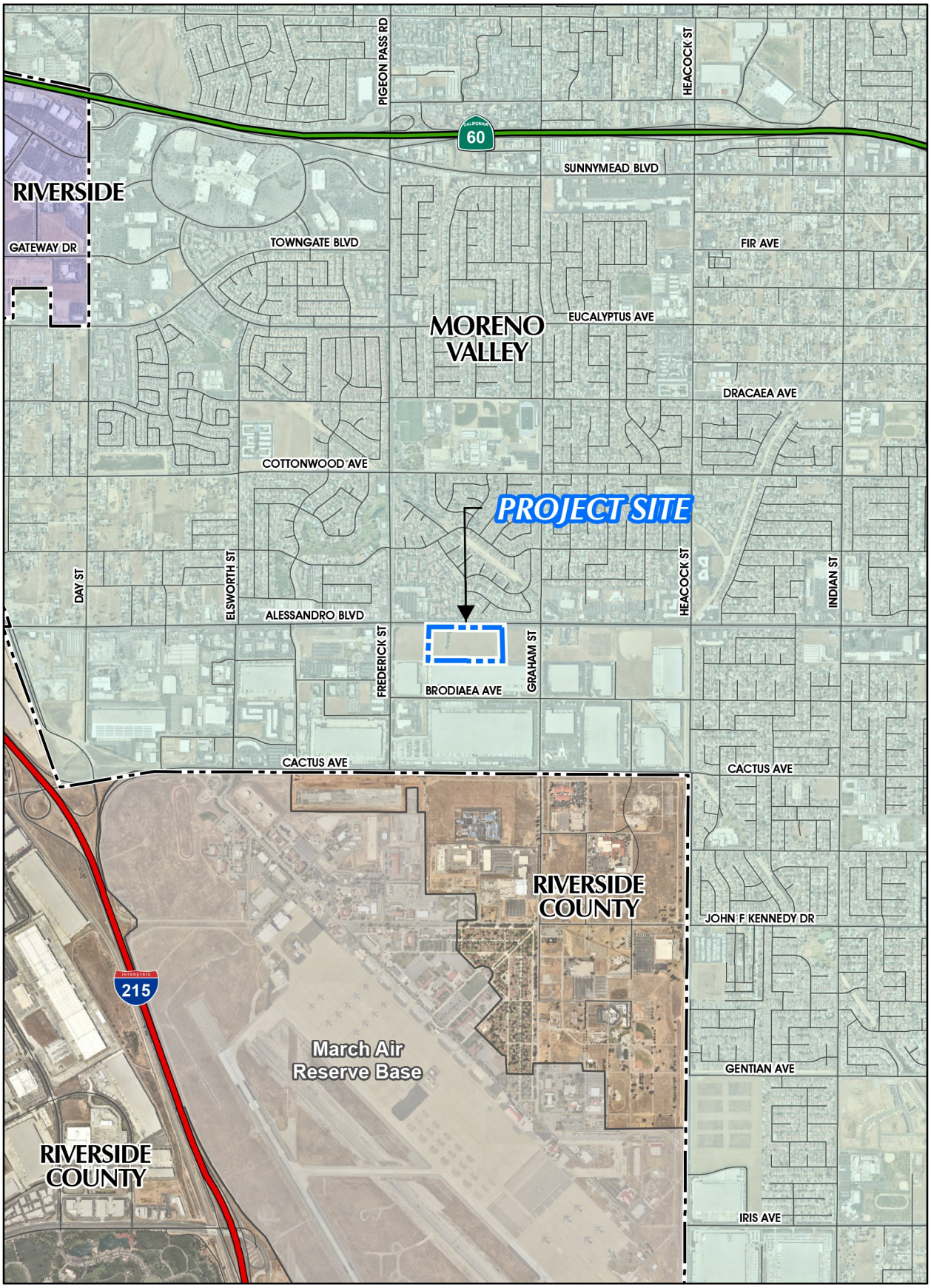
EPA	Environmental Protection Agency
et seq.	et sequentes, meaning “and the following”
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
GCC	Global Climate Change
GHG	Greenhouse Gas
gpd	Gallons per day
HCP	Habitat Conservation Plan
HMBEP	Hazardous Materials Business Emergency Plan
I-#	Interstate
i.e.	that is
IS/MND	Initial Study/Mitigated Negative Declaration
kBTU	kilo-British thermal units
kWh	Kilowatt-hour
L_{eq}	Equivalent sound level
lbs/day	pounds per day
MARB	March Air Reserve Base
MARB/IPA	March Air Reserve Base/Inland Port Airport
MBTA	Migratory Bird Treaty Act
MEIR	Maximally Exposed Individual Receptor
MEIW	Maximally Exposed Individual Worker
mgpd	Million gallons per day
MSHCP	Multiple Species Habitat Conservation Plan
$MTCO_2e$	Metric tons of carbon dioxide equivalent
MVFD	Moreno Valley Fire Department
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEPSSA	Narrow Endemic Plant Special Survey Area
NO_X	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NPL	National Priority List
$PM_{2.5}$	Fine Particulate Matter (2.5 microns or smaller)
PM_{10}	Fine Particulate Matter (10 microns or smaller)
RWQCB	Regional Water Quality Control Board
RTA	Riverside Transit Authority
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SARW-ILFP	Santa Ana River Watershed In-Lieu Fee Program
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SLF	Sacred Lands Files
SO_X	Sulfur Oxides
SR-#	State Route
SRA	State Responsibility Area
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency
UWMP	Urban Water Management Plan
VdB	Vibration Decibel
VMT	Vehicle Miles Travelled
VOCs	Volatile Organic Compounds
WQMP	Water Quality Management Plan



Source(s): ESRI, RCTLMA (2020)

Figure 1

Regional Map

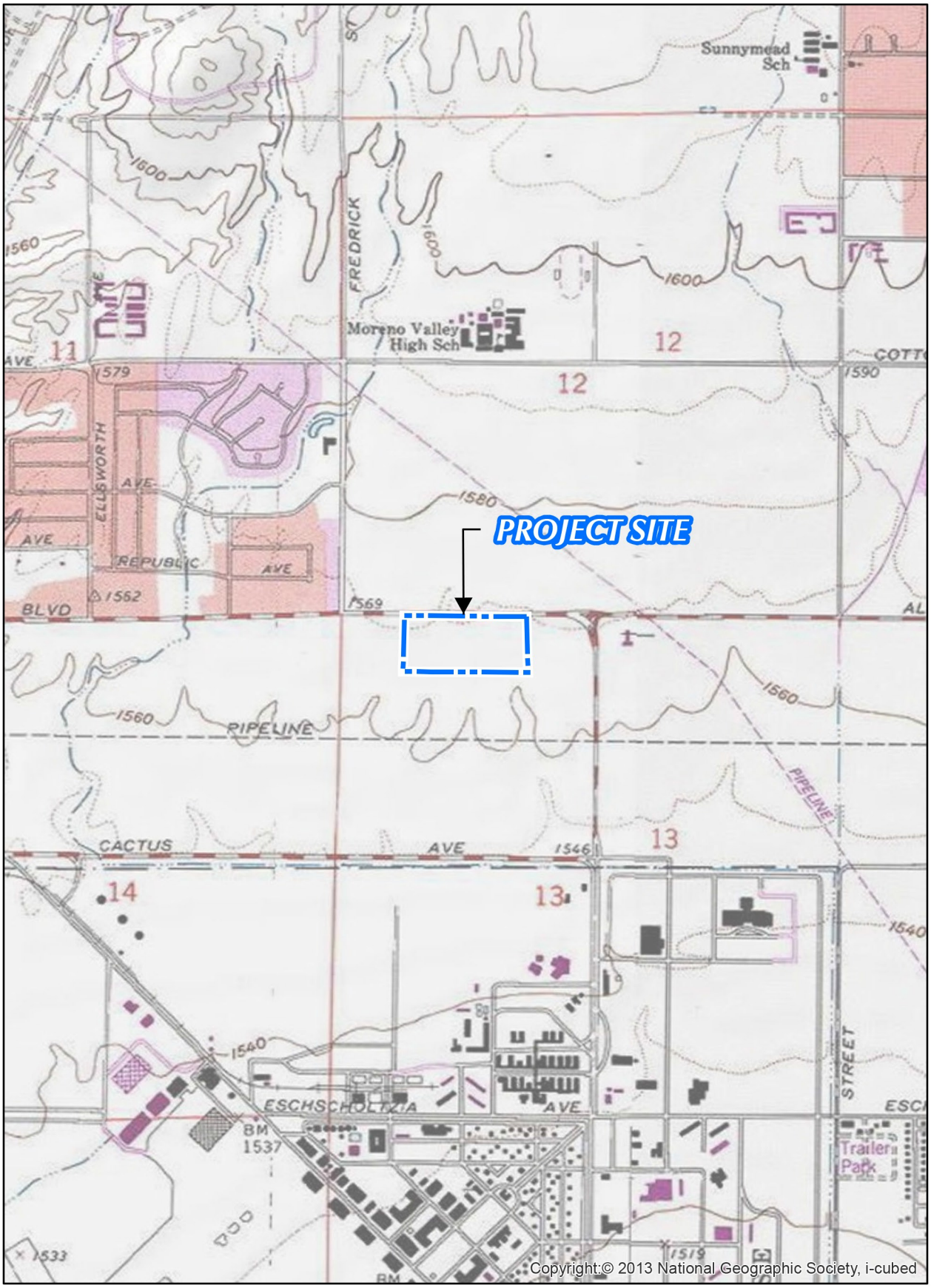


Source(s): ESRI, Nearmap Imagery (2020), RCTLMA (2020)

Figure 2

0 625 1,250 2,500 Feet

Vicinity Map

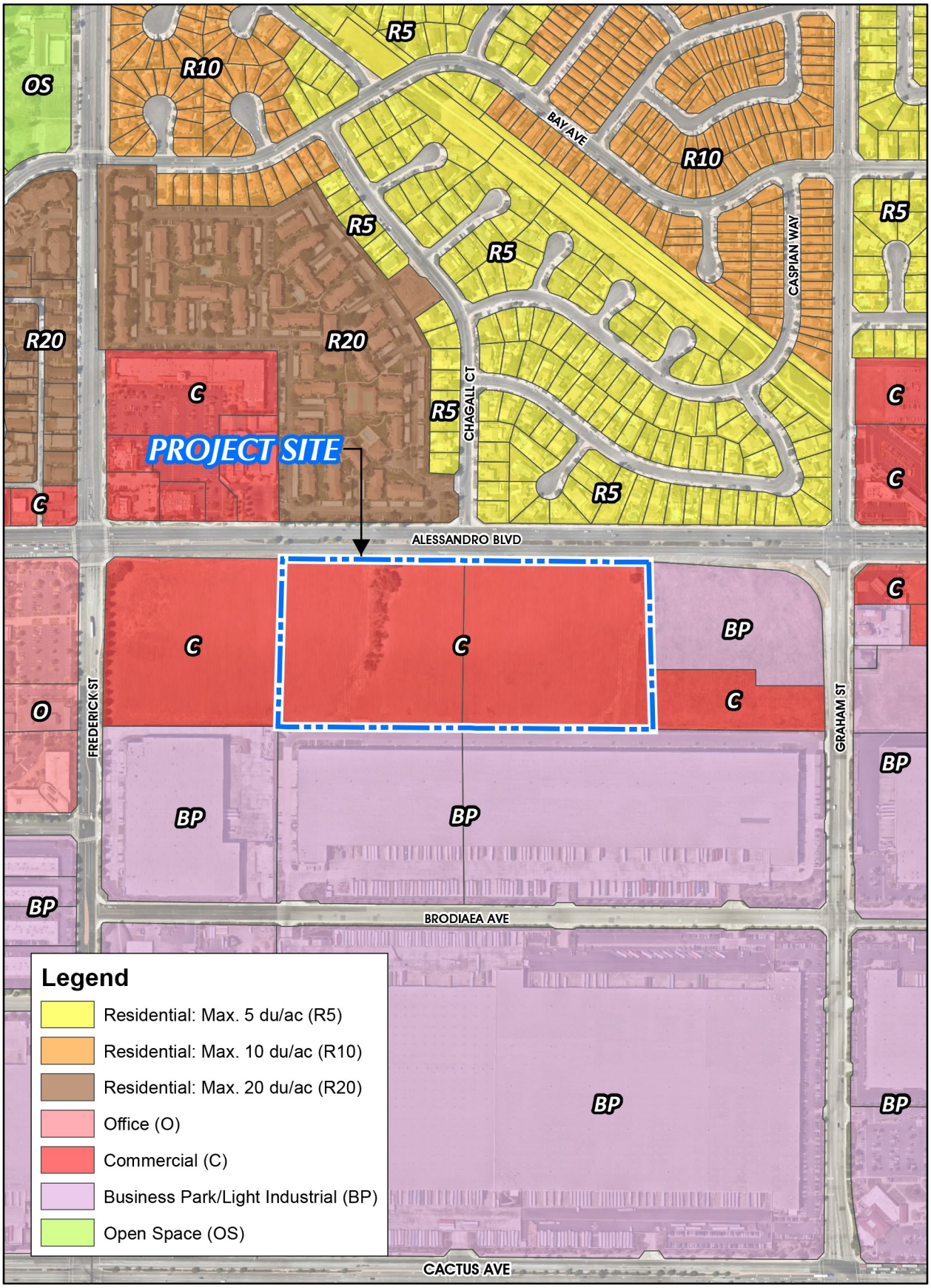


Source(s): USGS (2013)

Figure 3

0 375 750 1,500 Feet

USGS Topographic Map

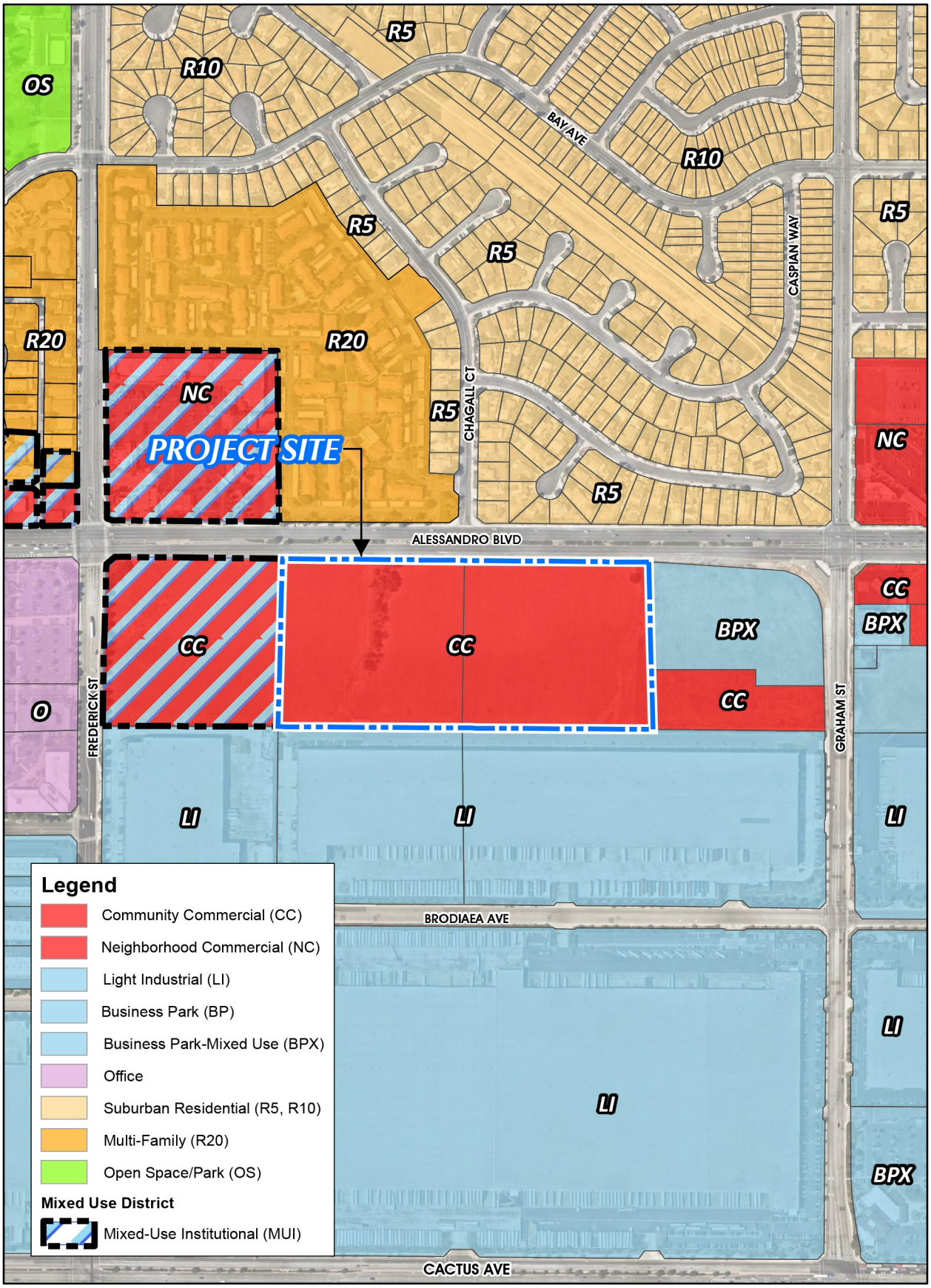


Source(s): City of Moreno Valley (2019), ESRI, Nearmap Imagery (2020), RCTLMA (2020)

Figure 4

0 125 250 500 Feet

Existing General Plan

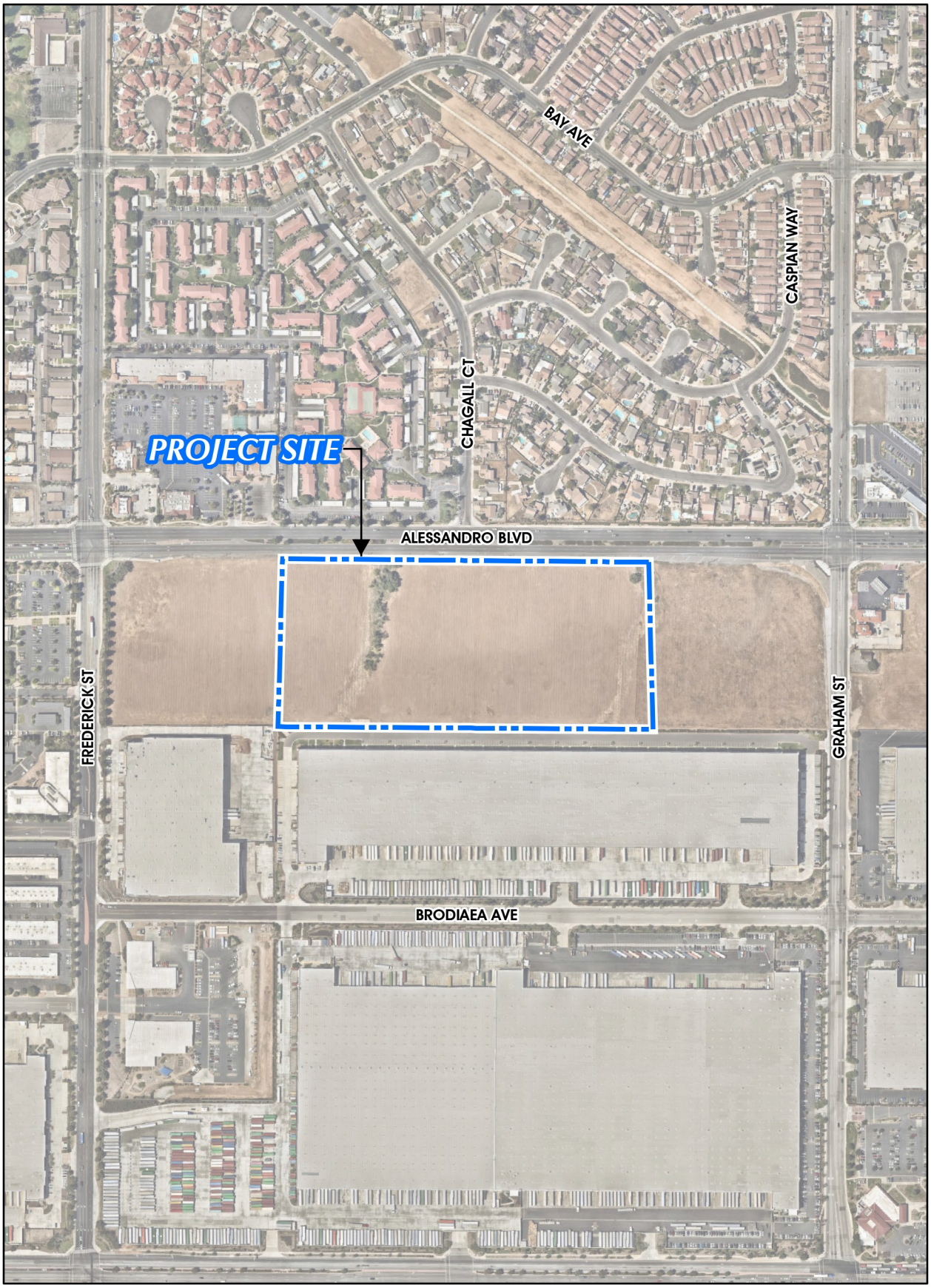


Source(s): City of Moreno Valley (2019), ESRI, Nearmap Imagery (2020), RCTLMA (2020)

Figure 5

0 125 250 500 Feet

Existing Zoning



Source(s): ESRI, Nearmap Imagery (2020), RCTLMA (2020)

Figure 6

0 125 250 500 Feet

Aerial Photograph

Site Photo 1: From Southeast Corner of the Project Site, looking West to North.

Site Photo 2: From Southern Edge of the Project Site, looking West to East.

Site Photo 4: From Northwest Corner of the Project Site, near Alessandro Blvd, looking East to South.

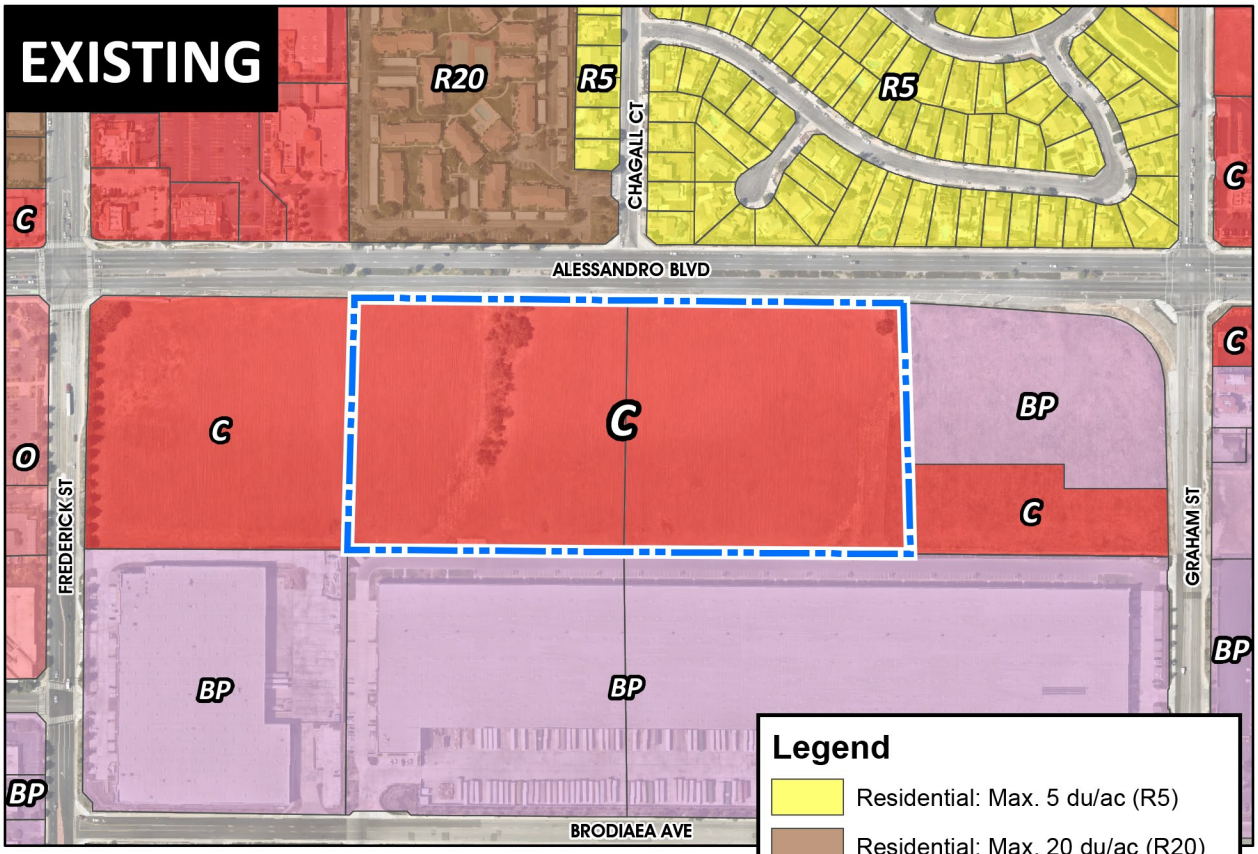
Site Photo 3: From Southwest Corner of the Project Site, looking North to East.

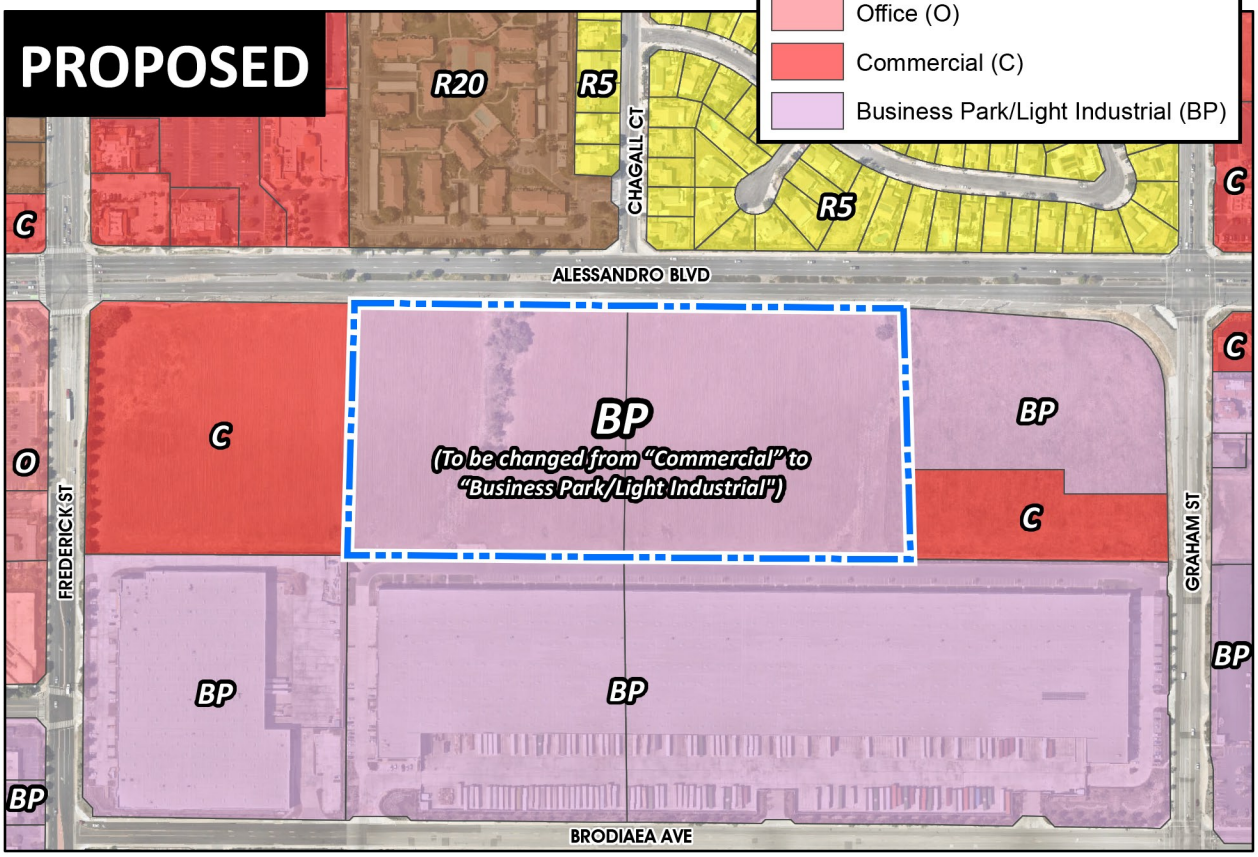
Site Photo 5: From Northeast Corner of the Project Site, near Alessandro Blvd, looking South to West.

Figure 7

Not to Scale

Site Photographs



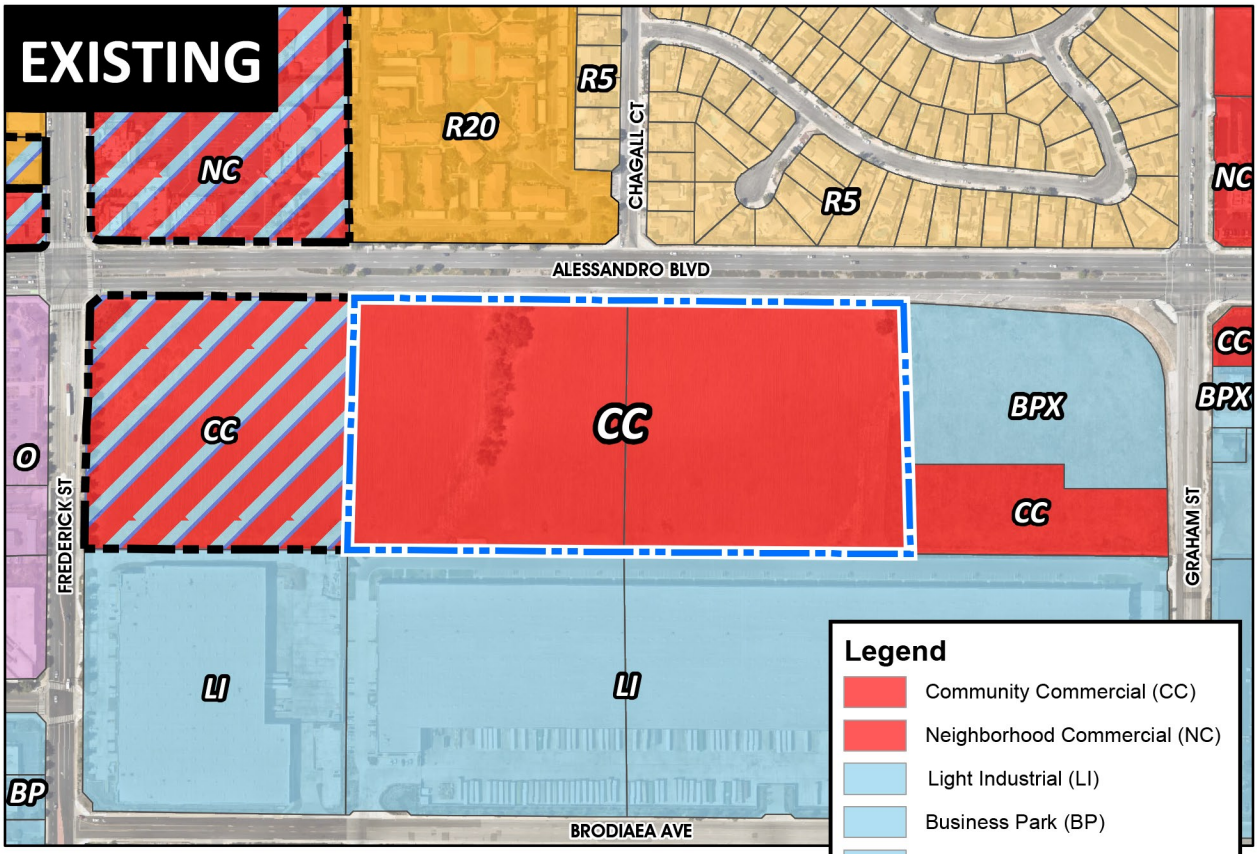


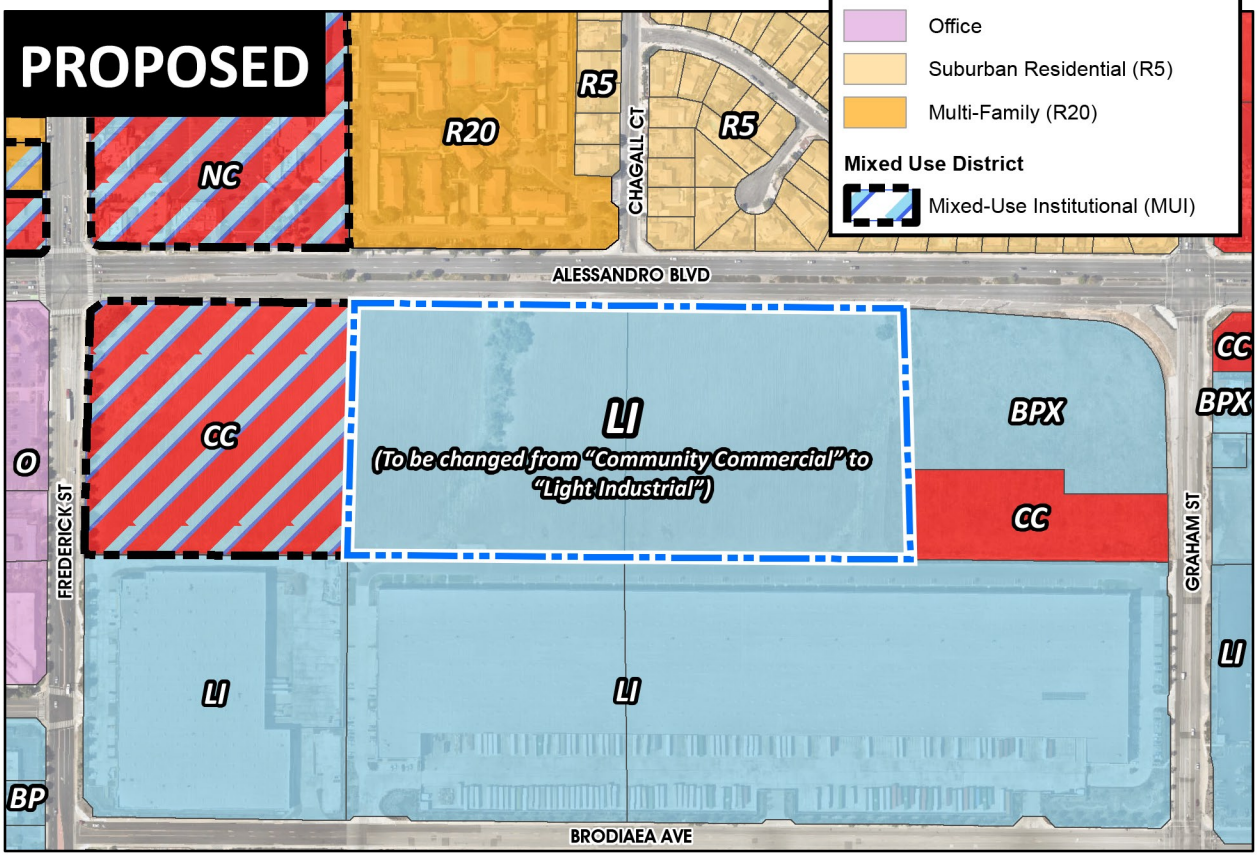
Source(s): City of Moreno Valley (2019), ESRI, Nearmap Imagery (2020), RCTLMA (2020)

Figure 8

0 112.5 225 450
Feet

General Plan Amendment (PEN20-0118)



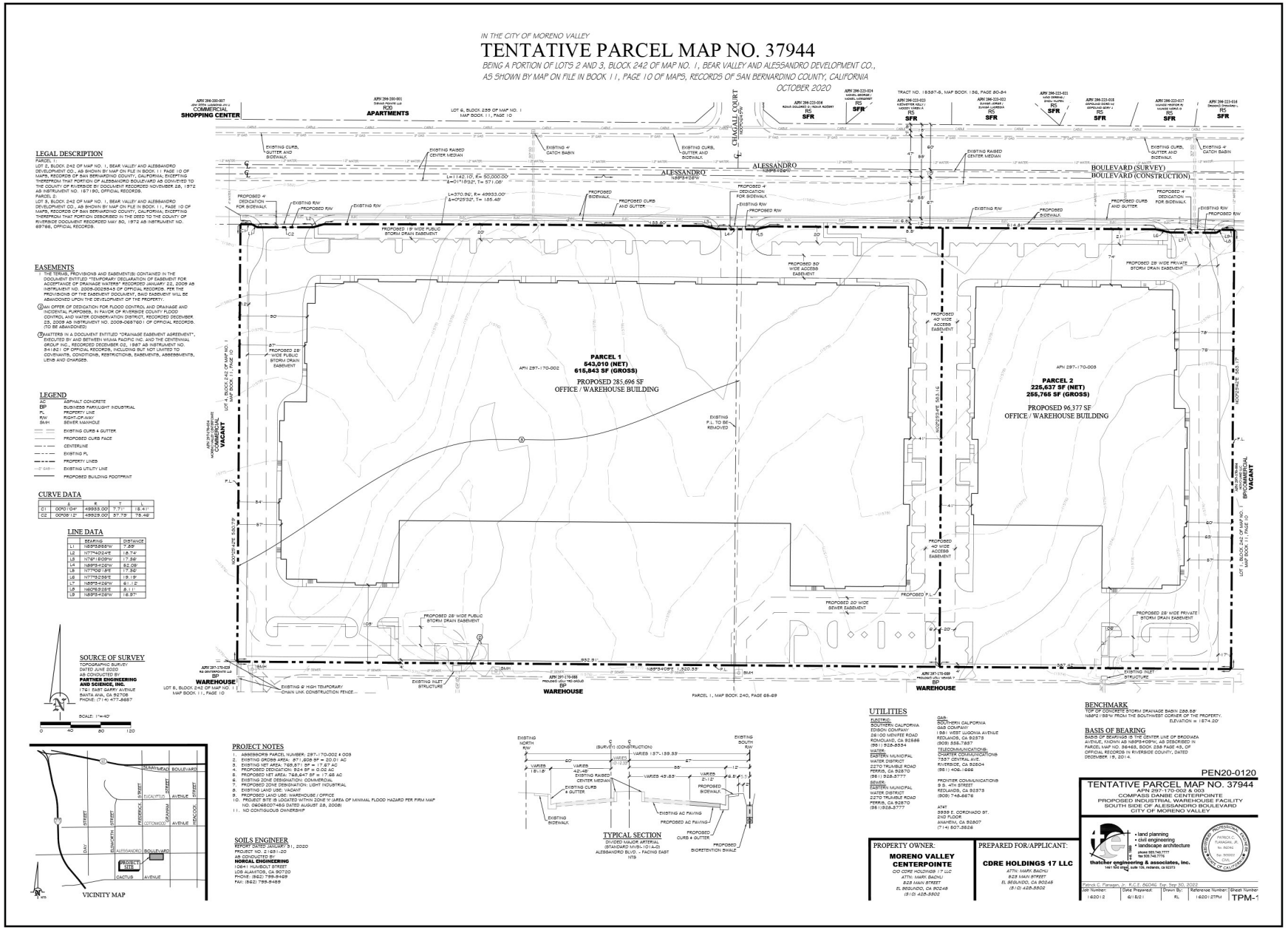


Source(s): City of Moreno Valley (2019), ESRI, Nearmap Imagery (2020), RCTLMA (2020)

Figure 9

0 112.5 225 450
Feet

Change of Zone (PEN20-0119)

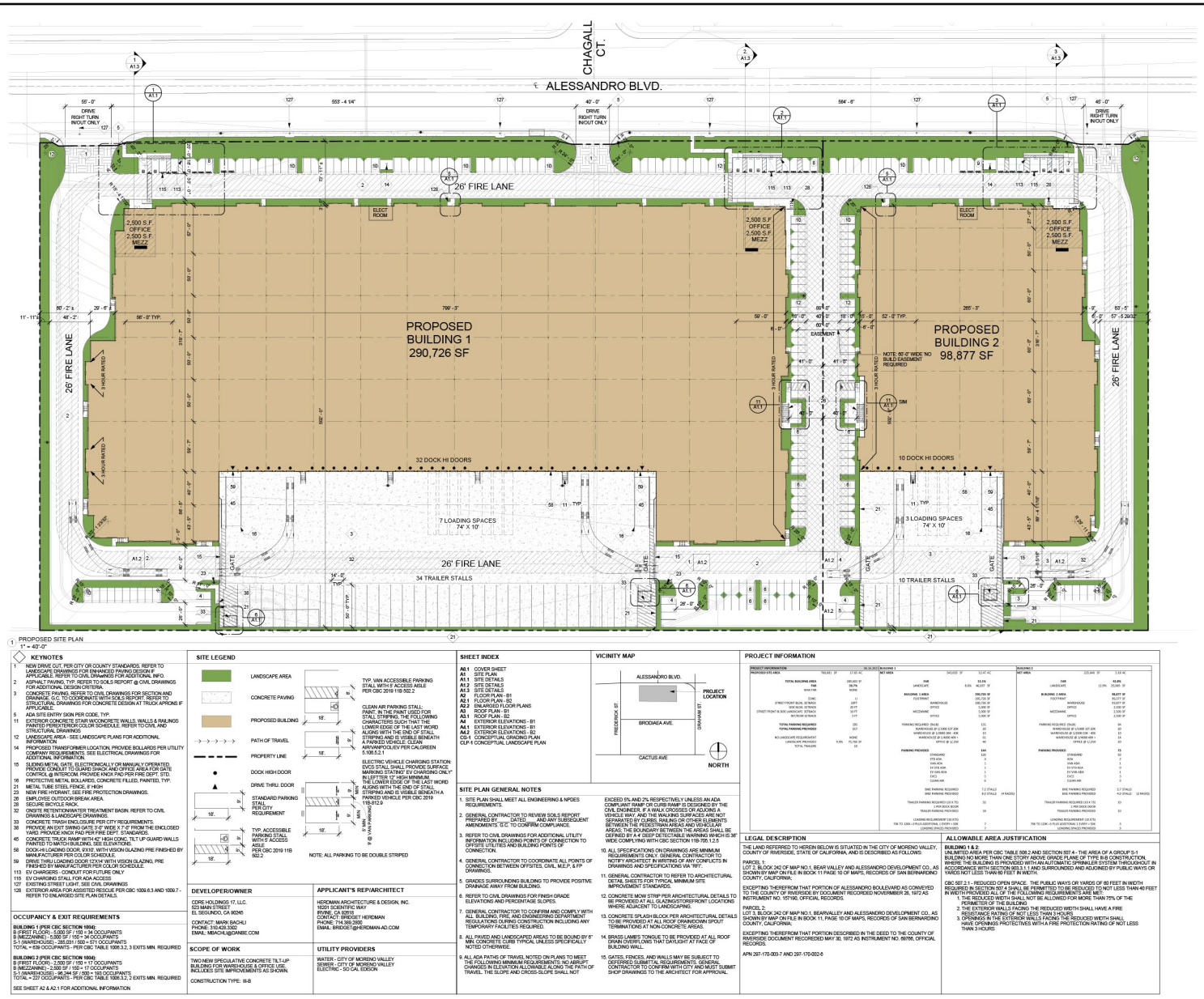


Source(s): Thatcher Engineering & Associates, Inc. (06-15-2021)

Figure 10

Not to Scale

Tentative Parcel Map No. 37944 (PEN20-0120)



Source(s): Herdman (07-21-2021)

Figure 11

Not to Scale

Site Plan

BUILDING 1 - NORTH ELEVATION

BUILDING 1 - WEST ELEVATION

BUILDING 1 - EAST ELEVATION

BUILDING 2 - NORTH ELEVATION

BUILDING 2 - WEST ELEVATION

BUILDING 2 - EAST ELEVATION

EXTERIOR COLOR SCHEDULE

	A	OFF WHITE EXTERIOR PAINT COLOR: SW6070 HERON PLUME
	B	MEDIUM TAUPE EXTERIOR PAINT COLOR: SW6073 PERFECT GREIGE
	C	WARM GRAY TILE
	D	BOARD FORMED OFF WHITE PAINTED CONCRETE
	E	STOREFRONT BLUE REFLECTIVE GLAZING & CHARCOAL ANODIZED MULLIONS
	F	DARK BRONZE BROW/AWNING

TYP PAINT NOTES:
PAINT MAN DOORS, GUARD WALLS, RAMP WALLS, STAIR WALLS, GUARD RAILS, ROOF DRAINS, AND LOUVERS TO MATCH ADJACENT BUILDING WALL U.N.O.

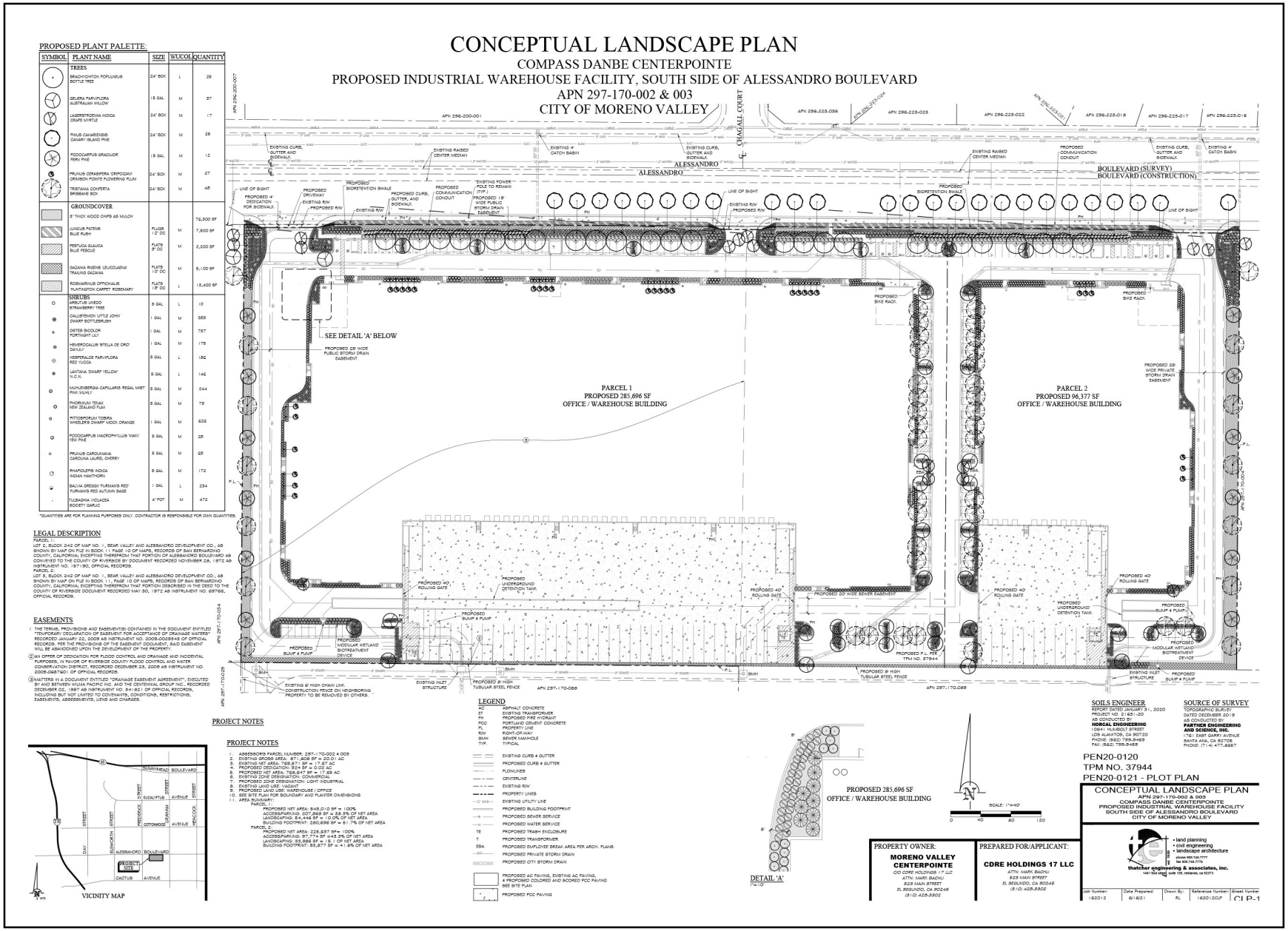
TRUCK DOORS TO BE PRE-FINISHED BY MANUFACTURER IN WHITE FINISH

Source(s): Herdman (10-08-2020)

Figure 12

Not to Scale

Architectural Elevations

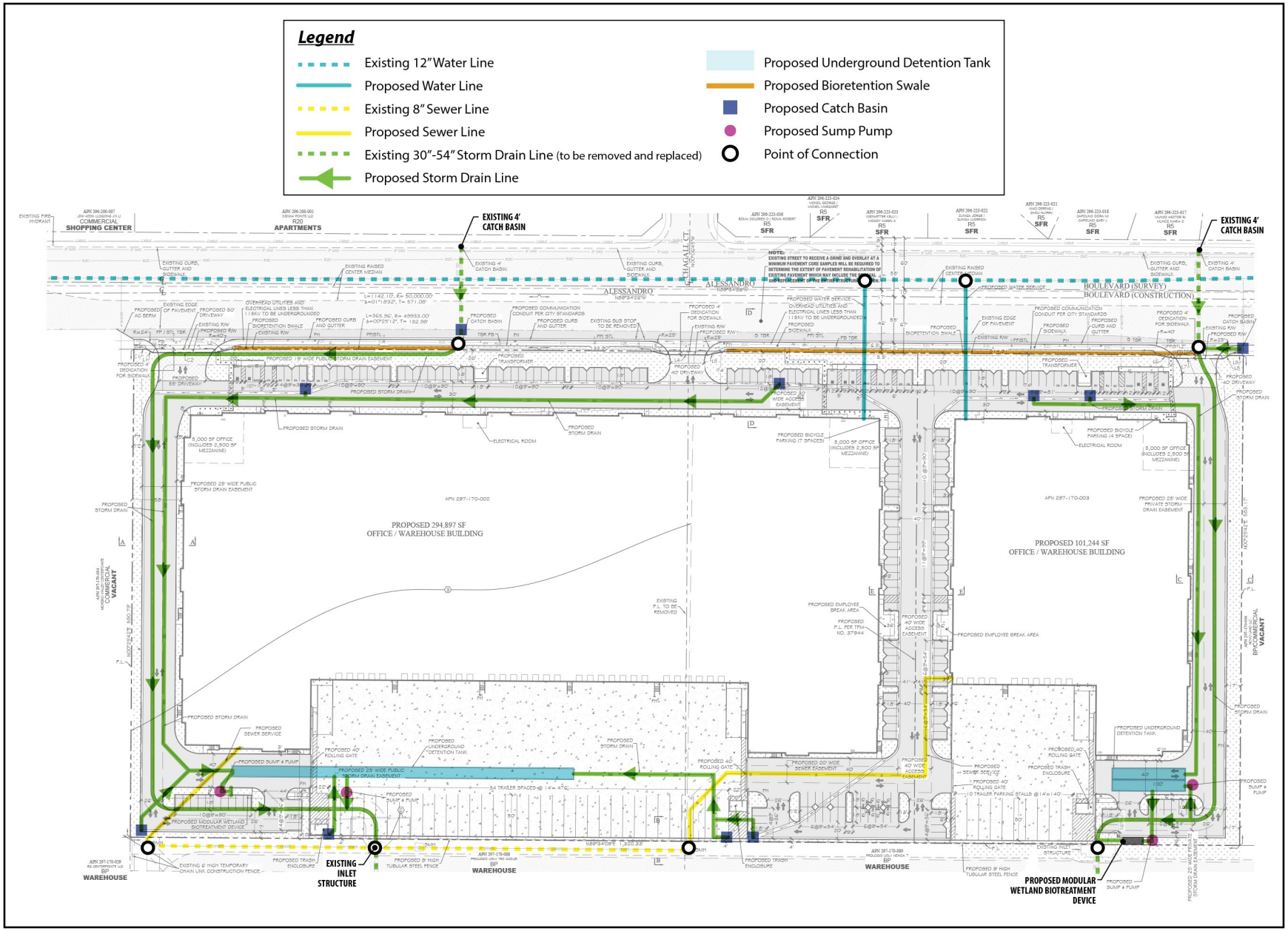


Source(s): Thatcher Engineering & Associates, Inc. (06-18-2021)

Figure 13

Not to Scale

Conceptual Landscape Plan

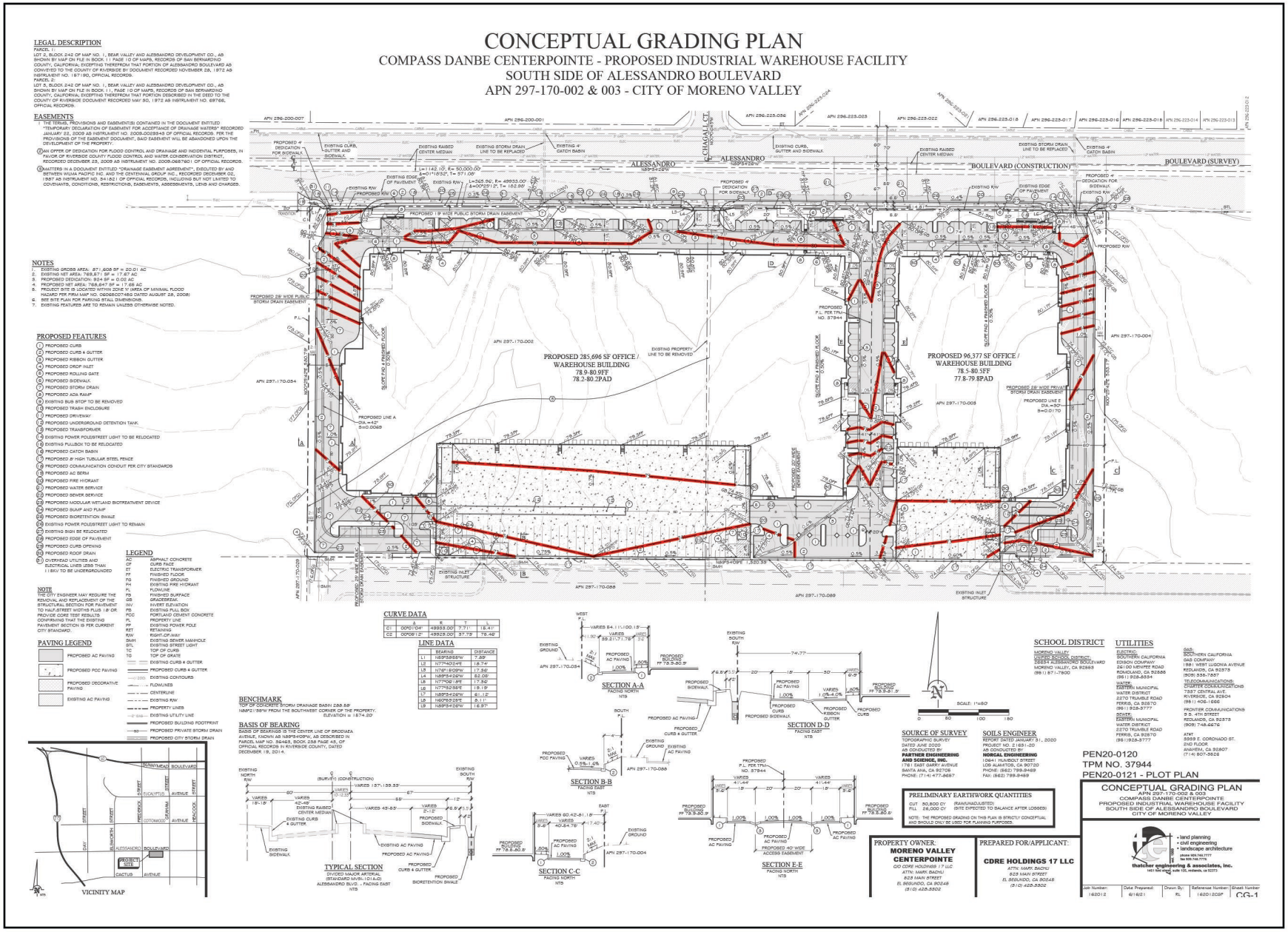


Source(s): Thatcher Engineering & Associates, Inc. (02-24-2021)

Figure 14

Not to Scale

Conceptual Utilities Plan



Source(s): Thatcher Engineering & Associates, Inc. (06-16-2021)

Figure 15

Not to Scale

Conceptual Grading Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION (To be completed by the Lead Agency):

On the basis of this initial evaluation:

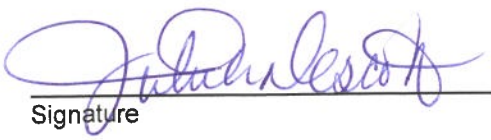
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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



Signature

July 21, 2021

Date

Julia Descoteaux

Printed Name

City of Moreno Valley

For

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

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

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

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

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

9) The explanation of each issue should identify:

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

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

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

Response: Scenic resources within the City of Moreno Valley are identified as Box Springs Mountains, the Foothills, the Badlands, and Mount Russell and its foothills. According to General Plan Figure 7-2, *Major Scenic Resources*, the Project site is not located within or adjacent to a designated scenic resource or within a view corridor for any of the designated scenic resources in the City (Moreno Valley, 2006a, Figure 7-2).

Scenic resources visible (at least partially) from public viewpoints adjacent to the Project site include Mount Russell (approximately 4.0 miles to the southeast and partially visible from Alessandro Boulevard) (Google Earth Pro, 2020). Under existing conditions, views of Mount Russell are largely obscured from Alessandro Boulevard due to intervening development and landscaping, topography, and atmospheric haze that is common in the Inland Empire throughout the year. The Project would not substantially alter any existing views of Mount Russell from Alessandro Boulevard. As stated above, views of Mount Russell from Alessandro Boulevard are largely obscured from the Project site by the existing warehouse abutting the southern Project site boundary and on-site landscaping (and, for parts of the year, atmospheric haze). The Project would construct buildings up to 46-feet-tall and install new landscaping on the Project site. The proposed building and site improvements would partially obscure views of Mount Russell from Alessandro Boulevard – although not substantially more than views are obscured under existing conditions – and views of the Mountains would continue to be available above the building.

Implementation of the Project would not result in any impacts to view corridors as identified in the City of Moreno Valley General Plan (Moreno Valley, 2006a, Figure 7-2). Additionally, implementation of the Project would not result in a substantial adverse impact to the general viewsheds of the scenic resources within the City. Therefore, the Project would result in a less-than-significant impact associated with an adverse effect on a scenic vista.

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

Response: The Project site is not located within or adjacent to a scenic highway corridor and there are no State-designated or eligible scenic highways within the vicinity of the Project site (Caltrans, 2019). Additionally, the City of Moreno General Plan does not identify any Scenic Route within proximity to the Project site (Moreno Valley, 2006a, Figure 7-2). The nearest State-designated scenic highway to the Project site is a segment of State Route (SR-) 74 located approximately 9.3 miles southeast of the Project site; the Project site would not be visible from this SR-74 segment due to distance and intervening development/topography (Caltrans, 2019; Google Earth Pro, 2020). It should be noted, also, that an area of Interstate (I-) 15 near the above-named segment of SR-74 is eligible for consideration as a State scenic highway; however, the Project site would not be visible from this portion of I-15 due to distance and intervening development/topography (Caltrans, 2019; Google Earth Pro, 2020). Accordingly, the Project site is not located within a State scenic highway corridor and implementation of the proposed Project would not have a substantial effect on scenic resources within a State scenic highway corridor. Thus, no impact to a State scenic highway would occur from implementation of the Project.

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: The Project site is located within an urbanized area, as defined by U.S. Census Bureau, and determined as part of the 2010 Census (U.S. Census Bureau, 2012). Thus, pursuant to this threshold,

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

a potentially significant impact to visual character only would occur if the Project were to conflict with applicable zoning and/or other City of Moreno Valley regulations governing scenic quality. Implementation of the proposed Project would result in the visual conversion of the site from vacant, undeveloped land to two industrial warehouse buildings with associated improvements including parking lots, drive aisles, utility infrastructure, landscaping, exterior lighting, and signage. The Project would be compatible with the size, scale, and aesthetic/decorative architectural and landscaping features of other existing light industrial/warehouse buildings constructed to the south and southwest of the Project site. Furthermore, the Project would be required to comply with the applicable development standards and design guidelines contained in the Moreno Valley Zoning Ordinance, which regulates the visual quality of new development and ensure that new development does not detract from any scenic attributes/qualities in the surrounding area. Because the Project site is located in an urbanized area and because the Project would not conflict with applicable regulations governing scenic quality, a less-than-significant impact would occur from implementation of the Project.

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

Response: Under existing conditions, the Project site contains no sources of artificial lighting; however, street lights are present along the Project site's frontage with Alessandro Boulevard. The Project Applicant proposes to develop the site with two industrial warehouse buildings and would introduce new lighting elements on-site to illuminate the parking areas, truck docking areas, and building entrances.

The Project Applicant would be required to comply with lighting requirements as set forth in the City of Moreno Valley Municipal Code Sections 9.10.110 and 9.16.280. The Municipal Code lighting standards govern the placement and design of outdoor lighting fixtures to ensure adequate lighting for public safety while also minimizing light pollution and glare and precluding public nuisances (e.g., blinking/flashing lights, unusually high intensity, or needlessly bright lighting). The City would confirm compliance with applicable lighting requirements during future review of building permit applications/plans. Mandatory compliance with the Municipal Code would ensure that the Project would not introduce any permanent design features that would adversely affect day or nighttime views in the area. This impact would be less than significant.

With respect to glare, a majority of Project building materials would consist of concrete panels, which are non-reflective. While window glazing has a potential to result in minor glare effects, such effects would not adversely affect daytime views of surrounding properties, including motorists along adjacent roadways, because the glass proposed for the Project would be low-reflective, proposed buildings would be set back from adjacent roadways at a distance, and proposed landscaping would provide a buffer between all proposed glass surfaces and the public right of way. Thus, glare impacts from proposed building elements would be less than significant.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element
     - Figure 7-2 – Major Scenic Resources
2. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.110 – Performance Standards, Light and Glare
   - Chapter 9.16 – Design Guidelines
3. Google Earth Pro, https://earth.google.com/web/
4. California Department of Transportation (Caltrans) Scenic Highway Program, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways
5. U.S. Census Bureau Urbanized Area Reference Maps, https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua75340_riverside--san_bernardino_ca/DC10UA75340.pdf

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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: The Project site is not utilized for agricultural purposes under existing conditions. According to mapping information available from the California Department of Conservation's (CDC) Farmland Mapping and Monitoring Program (FMMP), the Project site is classified as "Farmland of Local Importance" (CDC, 2016). Accordingly, the Project site does not contain any lands mapped by the FMMP as "Prime Farmland," "Unique Farmland," or "Farmland of Statewide Importance" and, thus, implementation of the Project would not convert such Farmland to a non-agricultural use. No impact would occur.				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
Response: The Project site is zoned for "Community Commercial" under existing conditions and would be re-zoned to "Light Industrial" as part of the Project; therefore, implementation of the Project would not conflict with zoning for agricultural use. Additionally, as disclosed in the City of Moreno Valley General Plan Final EIR, no land within the City – including the Project site – is under a Williamson Act Contract (Moreno Valley, 2006b, p. 5.8-6). Accordingly, implementation of the Project would not conflict with existing (or proposed) zoning for agricultural use or a Williamson Act contract. No impact 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: The Project site is not zoned as forest land, timberland, or Timberland Production, nor is it surrounded by forest land, timberland, or Timberland Production land. According to the City of Moreno Valley Zoning Map, there are no lands located within the City of Moreno Valley that are zoned for forest land, timberland, or timberland zoned Timberland Production. Therefore, the Project has no potential to conflict with any areas currently zoned as forest, timberland, or Timberland Production and would not result in the rezoning of any such lands. As such, no impact would occur.				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
Response: The Project site does not contain a forest and is not designated as forest land; therefore, the Project would not result in the loss of forest land or the conversion of forest land to non-forest use. As such, no impact would occur.				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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: "Farmland" is defined in Section II (a) of Appendix G of the State CEQA Guidelines as "Prime Farmland," "Unique Farmland" or "Farmland of Statewide Importance" ("Farmland"). As disclosed above under Response II(a), the Project would not result in the conversion of Farmland to non-agricultural use.

As discussed under Responses II(c) and II(d), the Project would not convert forest land to non-forest use. No impact would occur.

Sources:

1. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.8 – Agricultural Resources
2. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Chapter 9.03 – Residential District
3. Moreno Valley Zoning Map, http://www.moreno-valley.ca.us/cdd/pdfs/ZoningMap.pdf
4. California Department of Conservation – California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/

III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

Response: The Project site is located within the South Coast Air Basin (SCAB or "Basin"). The SCAB encompasses approximately 6,745 square miles and includes Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAB is bound by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, respectively; and the San Diego County line to the south. In these areas, the South Coast Air Quality Management District (SCAQMD) is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards.

Historically and presently, State and federal air quality standards are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. The current AQMP, the *2016 AQMP*, was adopted by SCAQMD in March 2017. Criteria for determining consistency with the *AQMP* are defined in Chapter 12 of the *SCAQMD's CEQA Air Quality Handbook (1993)*. The Project's consistency with these criteria is discussed below.

Consistency Criterion No. 1: The Project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 1 refers to violations of the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). As evaluated under Response III(c), below, the Project would not exceed the SCAQMD localized emissions threshold for any criteria pollutant during any construction phase of the Project. Accordingly, localized criteria pollutant emissions from Project construction would not increase the frequency or severity of existing air quality violations, cause or contribute to new violations, and/or delay the timely attainment of air quality standards or the interim emissions reductions specified in the *AQMP*.

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

The Project's operational emissions would not exceed SCAQMD localized emissions thresholds (refer to Response III(c), below); thus, long-term operation of the Project would not increase the frequency or severity of existing NAAQS and/or CAAQS violations, cause or contribute to new violations, and/or delay the timely attainment of air quality standards or the interim emissions reductions specified in the *AQMP*.

Therefore, construction and operation of the Project is determined to be consistent with the first criterion and the impact would be less than significant.

Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

The growth forecasts used in the *AQMP* to project future emissions levels are based in part on land use data provided by lead agency general plan documentation. Projects that propose to increase the intensity of use on a subject property may result in increased stationary area source emissions and/or vehicle source emissions when compared to the *AQMP* assumptions. If a project does not exceed the growth projections in the applicable local general plan, then the project is considered to be consistent with the growth assumptions in the *AQMP*. The prevailing planning documents for the Project site is the City of Moreno Valley General Plan. The City of Moreno Valley General Plan Land Use Map designates the Project site for Commercial land use. The Project includes a request to change the existing General Plan land use designation for the Project site from Commercial to Business Park/Light Industrial, which, if approved, would result in a land use and development intensity that was not anticipated by the General Plan, and, by extension, the growth models that were used in the *AQMP*. Although the Project would not be consistent with the land use assumptions used in the *AQMP*, Project construction and operation would not exceed applicable SCAQMD regional or localized air quality significance thresholds. As such, the Project's inconsistency with Consistency Criterion No. 2 would not result in a substantial adverse environmental impact.

For the reasons stated above, the Project would not result in a substantial adverse environmental impact due to an increase in the frequency or severity of existing air quality violations, the creation creation of new violations, the delay the timely attainment of air quality standards or the interim emissions reductions specified in the *AQMP*, or the exceedance of growth assumptions in the *AQMP*. As such, impacts would be less-than-significant.

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

Response: The proposed Project has the potential to generate substantial pollutant concentrations during both construction activities and long-term operation. An *Air Quality Impact Analysis* (Urban Crossroads, 2020a) and a *Mobile Source Health Risk Assessment* (Urban Crossroads, 2020b) were prepared for the Project by Urban Crossroads, Inc. to evaluate potential criteria and hazardous air pollutant emissions that could result from the Project's construction and operation. These reports are included as *Technical Appendices A1 and A2* to this IS/MND and their findings are incorporated into the analysis presented herein.

The following analysis is based on the applicable significance thresholds established by the SCAQMD for regional criteria pollutant emissions (as summarized in Table 3-1 of *Technical Appendix A1*). This analysis assumes that the Project would comply with applicable, mandatory regional air quality standards, including: SCAQMD Rule 403, "Fugitive Dust;" SCAQMD Rule 431.2, "Sulfur Content of Liquid Fuels;" SCAQMD Rule 1113, "Architectural Coatings;" SCAQMD Rule 1186, "PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations;" SCAQMD Rule 1186.1, "Less-Polluting Street Sweepers," and Title 13, Chapter 10, Section 2485, Division 3 of the California Code of Regulations "Airborne Toxic Control Measure."

For a detailed description of the health effects of air pollutants refer to Section 2.4 of the Project's Air Quality Impact Analysis (*Technical Appendix A1*). In general, air pollutants have adverse effects to human health including, but not limited to, respiratory illness and carcinogenic effects; however, based

on available modeling it is not feasible to correlate regional criteria pollutant emissions from development projects of the scale of the proposed Project to adverse health effects on a SCAB-wide level (Urban Crossroads, 2020a, pp. 10-16, 56-58). The potential for the Project to result in substantial adverse health effects from toxic air contaminant emissions is addressed under Response III(c), below.

Impact Analysis for Construction Emissions

For purposes of the construction emissions analysis, construction was conservatively expected to occur between October 2021 and June 2022. The California Emissions Estimator Model (CalEEMod) accounts for the implementation and enforcement of California's progressively more restrictive regulatory requirements for construction equipment and the ongoing replacement of older construction fleet equipment with newer, less-polluting equipment. Thus, according to the CalEEMod, construction activities that occur in the near future are expected to generate more air pollutant emissions than the same activities that may occur farther into the future. Accordingly, in the event that the Project's construction occurs at a later date than assumed in this air quality analysis, Project-related construction emissions are not expected to exceed the values presented herein (Urban Crossroads, 2020a, p. 38).

The calculated maximum daily emissions associated with Project construction are presented in Table 3, *Summary of Construction-Related Emissions*. The Project's construction characteristics and construction equipment fleet assumptions used in the analysis were previously described above in the Project Description (see Tables 1 and 2).

Table 3: Summary of Construction-Related Emissions

Year	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
2021	5.43	61.02	32.00	0.10	14.04	6.81
2022	54.69	42.10	50.18	0.13	6.92	2.92
Winter						
2021	5.43	61.02	31.86	0.09	14.04	6.81
2022	54.68	42.02	47.88	0.13	6.39	2.92
Maximum Daily Emissions	**54.69**	**61.02**	**50.18**	**0.13**	**14.04**	**6.81**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2020a, Table 3-4)

As shown in Table 3, the Project's daily construction emissions of volatile organic compounds (VOCs), nitrogen oxides (NO_X) carbon monoxide (CO), sulfur oxides (SO_X), and particulate matter (PM_{10} and $PM_{2.5}$) would not exceed SCAQMD regional criteria thresholds and, thus, would be less than significant. The SCAQMD considers any project-specific criteria pollutant emissions that exceed applicable SCAQMD significance thresholds also to be cumulatively-considerable. To put it another way, if a project does not exceed the SCAQMD regional thresholds, then SCAQMD considers that project's air pollutant emissions to not be cumulatively-considerable. Thus, because Project construction would not exceed the SCAQMD regional criteria significance thresholds, implementation of the Project would not result in a cumulatively-considerable net increase of any criteria pollutant, including any pollutants for which the SCAB does not attain applicable federal or State ambient air quality standards during construction.

Impact Analysis for Operational Emissions

Operational activities associated with the Project are expected to generate air pollutant emissions from the operation of motor vehicles (including trucks), landscape maintenance activities, application of architectural coatings, and the use of electricity and natural gas. Long term operational emissions associated with the Project are presented in Table 4, *Summary of Peak Operational Emissions*.

As summarized in Table 4, Project operational emissions of VOCs, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ would not exceed SCAQMD regional criteria thresholds. Accordingly, the Project would not emit substantial concentrations of these pollutants during long-term operation and would not contribute to an existing or projected air quality violation. The Project's long-term emissions of VOCs, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ would be less than significant.

Table 4: Summary of Peak Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Area Source	9.02	7.20E-04	0.08	0.00	2.80E-04	2.80E-04
Energy Source	0.19	1.73	1.45	0.01	0.13	0.13
Mobile Source (Passenger Cars)	1.27	1.18	18.96	0.06	6.56	1.76
Mobile Source (Trucks)	1.26	45.31	9.68	0.21	8.51	2.79
On-Site Equipment Source	0.24	2.54	1.52	0.01	0.09	0.08
Total Maximum Daily Emissions	**11.99**	**50.76**	**31.68**	**0.28**	**15.30**	**4.76**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Area Source	9.02	7.20E-04	0.08	0.00	2.80E-04	2.80E-04
Energy Source	0.19	1.73	1.45	0.01	0.13	0.13
Mobile Source (Passenger Cars)	1.21	1.25	16.16	0.05	6.56	1.76
Mobile Source (Trucks)	1.23	47.16	8.83	0.21	8.51	2.78
On-Site Equipment Source	0.24	2.54	1.52	0.01	0.09	0.08
Total Maximum Daily Emissions	**11.90**	**52.68**	**28.05**	**0.28**	**15.29**	**0.00**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2020a, Table 3-7)

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

Response: The following analysis addresses the Project's potential to expose sensitive receptors in the immediate vicinity of the Project site to substantial pollutant concentrations during Project construction and long-term operation. The following analysis is based on the applicable significance thresholds established by the SCAQMD (as summarized in Tables 3-9 and 3-11 of *Technical Appendix A1*).

Impact Analysis for Construction Localized Emissions

As summarized in Table 5, *Summary of Construction Localized Emissions*, localized emissions of NO_X, CO, and particulate matter (PM_{10} and $PM_{2.5}$) would not exceed applicable SCAQMD thresholds during peak Project construction activities. Accordingly, Project construction would not expose any sensitive receptors to substantial concentrations of criteria pollutants. Impacts would be less than significant.

Impact Analysis for Operational Localized Emissions

The Project's operational localized emissions are presented in Table 6, *Summary of Operational Localized Emissions*. As shown, the Project's peak operational emissions would not exceed the localized thresholds established by the SCAQMD. Accordingly, long-term operation of the Project would not result in the exposure of any sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

Impact Analysis for CO "Hot Spots"

Localized areas where ambient CO concentrations exceed the CAAQS and/or NAAQS are termed CO "hot spots." Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. Consequently, the highest CO concentrations are generally found within close proximity to congested intersection locations.

For purposes of providing a conservative, worst-case impact analysis, the Project's potential to cause or contribute to CO hotspots was evaluated by comparing study area intersections that would receive Project traffic (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs. In the 2003 AQMP, the SCAQMD evaluated CO concentrations at

Table 5: Summary of Construction Localized Emissions

On-Site Emissions	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Site Preparation				
Maximum Daily Emissions	**60.79**	**21.85**	**13.83**	**6.75**
SCAQMD Localized Threshold	297	2,082	36	10
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading				
Maximum Daily Emissions	**56.54**	**31.23**	**8.77**	**3.84**
SCAQMD Localized Threshold	297	2,082	36	10
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Building Construction				
Maximum Daily Emissions	**18.75**	**17.67**	**1.03**	**0.96**
SCAQMD Localized Threshold	297	2,082	36	10
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Paving				
Maximum Daily Emissions	**11.12**	**14.58**	**0.57**	**0.52**
SCAQMD Localized Threshold	297	2,082	36	10
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Architectural Coating				
Maximum Daily Emissions	**1.88**	**2.42**	**0.11**	**0.11**
SCAQMD Localized Threshold	297	2,082	36	10
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2020a, Table 3-9)

Table 6: Summary of Operational Localized Emissions

Operational Activity	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions	**6.69**	**4.48**	**0.97**	**0.44**
SCAQMD Localized Threshold	297	2,082	9	3
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2020a, Table 3-11)

four (4) busy intersections in the City of Los Angeles that were determined to be the most congested intersections in the SCAB. Each of the evaluated intersections were primary thoroughfares, some of which were located near major freeway on/off ramps, and experienced traffic volumes of approximately 100,000 vehicles per day. The SCAQMD's analysis at these busy intersections did not identify any CO hotspots. Based on an analysis of the intersections in the Project's study area, Urban Crossroads determined that none of the intersections in the Project's study area would be subject to the extreme traffic volumes and vehicle congestion of the intersections modeled by the SCAQMD in the 2003 AQMP (Urban Crossroads, 2020a, pp. 52-53). Therefore, Project-related vehicular emissions would not create a CO hot spot and would not substantially contribute to an existing or projected CO hot spot. Impacts would be less than significant.

Impact Analysis for Diesel Particulate Emissions

Diesel-fueled trucks would travel to/from the Project site during operation of the Project. Diesel trucks produce diesel particulate matter (DPM), which is known to be associated with health hazards, including cancer. To evaluate the Project's potential to expose sensitive receptors within ¼-mile of the Project site and the Project's primary truck travel routes to substantial amounts of DPM during long-term operation, a *Mobile Source Health Risk Assessment* was prepared for the proposed Project (*Technical Appendix A2*). Project-related DPM health risks are summarized below. Detailed air dispersion model outputs and risk calculations are presented in Appendices 2.1 and 2.2, respectively, of *Technical Appendix A2*.

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

At the maximally exposed individual receptor (MEIR) – the existing residential home located approximately 152 feet north of the Project site – the maximum cancer risk attributable to the Project's DPM emissions is calculated to be 4.48 in one million. The cancer risk attributable to the Project at the MEIR would not exceed the SCAQMD cancer risk threshold of 10 in one million. At the MEIR, the non-cancer health risk index attributable to the Project would be 0.002, which would not exceed the SCAQMD non-cancer health risk index of 1.0 (Urban Crossroads, 2020b, p. 1). Accordingly, long-term operations at the Project site would not directly cause or contribute in a cumulatively-considerable manner to the exposure of residential receptors to substantial DPM emissions. Therefore, implementation of the Project would result in a less-than-significant impact.

At the maximally exposed individual worker (MEIW) – the office building located approximately 744 feet west of the Project site – the maximum cancer risk attributable to the Project's DPM emissions is calculated to be 0.18 in one million. The cancer risk attributable to the Project at the MEIW would not exceed the SCAQMD cancer risk threshold of 10 in one million. At the MEIW, the non-cancer health risk index attributable to the proposed Project would be 0.0006, which would not exceed the SCAQMD non-cancer health risk index of 1.0 (Urban Crossroads, 2020b, p. 1). Therefore, the Project would result in a less-than-significant impact.

There are no schools located within a ¼ mile of the Project site, which is the distance from the Project site with the highest concentration of Project-related DPM emissions. Proximity to sources of toxics is critical to determining the impact. Based on California Air Resources Board and SCAQMD emissions and modeling analyses, particulate matter pollutant concentrations drop by 70 percent at approximately 500 feet from the emissions source and by 80 percent at approximately 1,000 feet from the emissions source (Urban Crossroads, 2020b, p. 2). Because there are no schools located within at least 1,320 feet of the Project site, implementation of the Project would not expose any school child receptors to substantial concentrations of diesel particulate matter emissions. Project-related truck traffic would travel off-site along public streets (traffic to/from I-215 is expected to travel along Alessandro Boulevard and Cactus Avenue). There are no schools located within ¼ mile of Alessandro Boulevard and Cactus Avenue between the Project site and I-215; therefore, the Project-related traffic traveling to/from I-215 would not expose school children receptors to substantial DPM concentrations. Based on the foregoing analysis, implementation of the Project would not expose school child receptors to substantial DPM concentrations. This impact is less than significant.

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

Response: The Project could produce odors during proposed construction activities resulting from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, any odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. In addition, construction activities on the Project site would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance (Urban Crossroads, 2020a, pp. 58-59). Accordingly, the proposed Project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant.

During long-term operation, the Project would include a warehouse land use, which is not typically associated with objectionable odors. The temporary storage of refuse associated with the proposed Project's long-term operational use could be a potential source of odor; however, Project-generated refuse is required to be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations, thereby precluding any significant odor impact. Furthermore, the proposed Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance, during long-term operation (Urban Crossroads, 2020b, pp. 58-59) As such, long-term operation of the proposed Project would not create objectionable odors affecting a substantial number of people and 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

Sources:

1. Urban Crossroads, 2020a, Air Quality Impact Analysis, *Technical Appendix A1*
2. Urban Crossroads, 2020b, Mobile Source Health Risk Assessment, *Technical Appendix A2*

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: A *Multiple Species Habitat Conservation Plan (MSHCP) Compliance Analysis* was prepared for the Project by MIG. The MSHCP compliance analysis addresses potential impacts to candidate, sensitive, or special status species due to implementation of the Project and is included as *Technical Appendix B1* to this IS/MND (MIG, 2020a). Focused burrowing owl and least Bell's vireo survey reports address the potential for the respective species to occur on the Project site and are included as *Technical Appendices B4* and *B5* (MIG, 2020b; MIG, 2020c). The analysis presented below is based on the findings of the abovementioned reports.

Special-Status Plant Species

All special-status plant species that have potential to occur within the Project survey area are adequately covered by the Western Riverside County MSHCP (MIG, 2020a, p. 15). Furthermore, the Project survey area is not located within a Narrow Endemic Plant Special Survey Area (NEPSSA) or Criteria Area Plant Special Survey Area (CAPSSA) and, thus, is not considered to be in an area with a high likelihood of supporting populations of sensitive native plant species (MIG, 2020a, p. 15). Implementation of the Project would not result in substantial adverse impacts to special-status plants and mitigation is not required.

Special-Status Wildlife Species

The Project site supports suitable habitat for the burrowing owl and least Bell's vireo; however, neither species was observed on the Project site during focused species surveys (MIG, 2020a, pp. 15-16; MIG 2020b, p. 4; MIG 2020c, p. 5). All other special-status wildlife species that have the potential to occur within the Project survey area are adequately covered by the Western Riverside County MSHCP (MIG, 2020a, pp. 15-16). The Project's consistency with the MSHCP is addressed under Response IV(f).

Notwithstanding the information presented above, the burrowing owl is a nomadic species and there is the potential that the species could migrate onto the Project site prior to construction. If burrowing owls are present on the Project site during grading activities, the Project's impact to the species would be significant and mitigation would be required, as discussed below.

Additionally, implementation of Project would result in removal of vegetation across the Project site that has the potential to support nesting and/or migratory birds that are granted special status by federal and State regulations. The Project's potential to impact nesting birds and migratory birds is a significant direct impact for which mitigation is required, as discussed below.

MM BR-1 and MM BR-2 would reduce potential impacts to the burrowing owl and nesting/migratory birds to less-than-significant levels by ensuring that pre-construction surveys are conducted to determine the presence or absence on the Project site of the burrowing owl and/or protected nesting bird species prior to the commencement of construction activities. If the burrowing owl or protected nesting bird species are present, the mitigation measures provide performance criteria that require avoidance and/or relocation of the species in accordance with accepted protocols.

Based on the foregoing analysis, the proposed Project would result in less-than-significant impacts to candidate, sensitive, or special status species with the implementation of mitigation.

Mitigation

MM BR-1 Within 30 days prior to grading, a qualified biologist shall conduct a survey of suitable habitat on site and make a determination regarding the presence or absence of the burrowing owl. The determination shall be documented in a report and shall be submitted, reviewed, and accepted by the City of Moreno Valley prior to the issuance of a grading permit and subject to the following provisions:

a) In the event that the pre-construction survey identifies no burrowing owls on the property a grading permit may be issued without restriction.

b) In the event that the pre-construction survey identifies the presence of at least one individual but less than three (3) mating pairs of burrowing owl, then prior to the issuance of a grading permit and prior to the commencement of ground-disturbing activities on the property, the qualified biologist shall passively or actively relocate any burrowing owls. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit.

c) In the event that the pre-construction survey identifies the presence of three (3) or more mating pairs of burrowing owl, the requirements of MSCHP Species-Specific Conservation Objectives 5 for the burrowing owl shall be followed. Objective 5 states that if the site (including adjacent areas) supports three (3) or more pairs of burrowing owls and supports greater than 35 acres of suitable habitat, at least 90 percent of the area with long-term conservation value and burrowing owl pairs will be conserved onsite until it is demonstrated that Objectives 1-4 have been met. A grading permit shall be issued, either:

i) Upon approval and implementation of a property-specific Determination of Biologically Superior Preservation (DBESP) report for the burrowing owl by the CDFW; or

ii) A determination by the biologist that the site is part of an area supporting less than 35 acres of suitable Habitat, and upon passive or active relocation of the species following accepted CDFW protocols. Passive relocation, including the required use of one-way doors to exclude owls from the site and the collapsing of burrows, will occur if the biologist determines that the proximity and availability of alternate habitat is suitable for successful passive relocation. Passive relocation shall follow CDFW relocation protocol and shall only occur between September 15 and February 1. If proximate alternate habitat is not present as determined by the biologist, active relocation shall follow CDFW relocation protocol. The biologist shall confirm in writing that the species has fledged the site or been relocated prior to the issuance of a grading permit.

MM BR-2 All vegetation clearing and ground disturbance shall be prohibited during the bird nesting season (February 1 through September 15), unless a nesting bird survey is completed in accordance with the following requirements:

a) A bird nesting survey of the Project Site, including suitable habitat within a 100-foot radius, shall be conducted by a qualified biologist within five (5) days prior to initiating

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

vegetation clearing or ground disturbance at the respective property. A copy of the nesting bird survey results report shall be provided to the City of Moreno Valley.

b) If the survey does not identify the presence of any active nests, then construction activities can proceed without restriction.

c) If the survey identifies the presence of active nests, then the qualified biologist shall provide the City with a copy of maps showing the location of all nests and a species-appropriate buffer zone around each nest sufficient to protect the nest from substantial adverse direct and/or indirect impacts. The size and location of all buffer zones, if required, shall be subject to review and approval by the City but shall be no less than a 100-foot radius around the nest for non-raptor species and no more than a 500-foot radius around the nest for raptor species and any endangered, threatened, or candidate species.

i) The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing. No construction vehicles shall be permitted within restricted areas (i.e., bird protection zones), unless directly related to the management or protection of the legally protected species, until after the nest becomes inactive (or the nest has failed), 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 the activities.

ii) In the event that a nest is abandoned despite efforts to minimize disturbance and, if the nestlings are still alive, the Project Applicant/Developer shall contact the California Department of Fish and Wildlife (CDFW) and, subject to CDFW approval, fund the recovery and hacking (controlled release of captive reared young) of the nestling(s).

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

Response: A jurisdictional delineation report was prepared for the Project. The jurisdictional delineation identifies potential jurisdictional waters and wetlands located on and abutting the Project site and is included as *Technical Appendix B2* to this IS/MND (MIG, 2021a). Additionally, a DBESP report was prepared to address potential MSHCP riparian/riverine areas located on and abutting the Project site. The DBESP report is included as *Technical Appendix B3* (MIG, 2021b).

The Project would permanently impact approximately 0.61-acre of riparian and riverine habitats subject to CDFW jurisdiction, which are located within the black willow riparian woodland habitat (0.39-acre), disturbed wetland-cattail (0.02-are), and wetland meadow along two ephemeral drainage courses (Drainages A and B, totaling 0.81-acre) on the Project site (MIG, 2021a, pp. 25-26). Accordingly, the Project would have a direct significant impact on riparian/riverine habitat and sensitive natural community for which mitigation is required.

MM BR-3 would reduce potential impacts to less-than-significant impacts by ensuring that the Project Applicant obtains all applicable permits for impacts to jurisdictional features and fully compensates for the permanent impacts to riparian/riverine habitat through the purchase of habitat mitigation credits at an approved mitigation bank. With implementation of MM BR-3, the proposed Project would result in less-than-significant impacts to riparian/riverine habitats and sensitive natural communities (MIG, 2021b, pp. 10-11).

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
MM BR-3 Prior to the issuance of grading permits, the Project Applicant shall obtain all applicable permits for impacts to jurisdictional features, which may include a 1602 Streambed Alteration Agreement from CDFW and a 401 Certification issued by the RWQCB pursuant to the California Water Code Section 13260. In addition, the Project Applicant shall purchase a minimum of 0.81-acre of re-establishment credits (a 1:1 mitigation-to-impact ratio for impacts to wetland meadow habitat) and 0.82-acre of rehabilitation credits (a 2:1 mitigation-to-impact ratio for impacts to black willow riparian woodland and disturbed wetland-cattail habitats). Habitat mitigation credits can be purchased either at an approved Habitat Mitigation Bank (e.g., Riverpark Mitigation Bank) or via an In-Lieu Fee Program (e.g., Riverside-Corona Resource Conservation District and the Southwest Resource Management Association Santa Ana River Watershed In-Lieu Fee Program). Approval to purchase the mitigation credits must be granted in advance by the resource agencies. The Project Applicant shall provide evidence to the City of Moreno Valley that the applicable permits have been obtained and that the required habitat mitigation credits have been purchased prior to issuance of grading permits.				
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
Response: Implementation of the Project would permanently impact 0.02-acre of Wetland Waters of the State, associated with the on-site disturbed wetland-cattail habitat) (MIG, 2021a, pp. 25, 27). No other federal of State-protected wetland waters, including vernal pools, are present on the Project site (MIG, 2021a, p. 22). Accordingly, the Project would have a direct significant impact on State-protected wetlands for which mitigation is required. MM BR-3 would reduce Project impacts to State-protected wetlands to a less-than-significant level by ensuring that the Project Applicant obtains all applicable permits for impacts to jurisdictional features and fully compensates for the permanent impacts to State wetlands through the purchase of habitat mitigation credits at an approved mitigation bank. With implementation of MM BR-3, the proposed Project would result in less-than-significant impacts to State-protected wetlands (MIG, 2021b, pp. 10-11).				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with an established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
Response: Wildlife movement corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbances. The Project site was evaluated for its function as a wildlife corridor that species would use to move between wildlife habitat zones as part of the MSHCP Compliance Analysis. Generally, mountain canyons and/or riparian corridors are used by wildlife as corridors; the Project site does not contain either of these features. Furthermore, the Project site is substantially surrounded by human activity in the form of industrial land uses and roadways. Lastly, the Project site is not identified for conservation or designated as a wildlife movement corridor as part of the MSHCP and the Project would be consistent with the MSHCP and, thus, would not interfere with or affect any MSHCP-designated wildlife movement corridor. (MIG, 2020a, p. 17) Therefore, no impact to a wildlife corridor would occur from implementation of the Project. Wildlife nurseries are sites where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas, and bat colonies. Although no nesting birds or remnant nests were observed on the Project site by MIG, implementation of the Project could potentially result in significant impacts to biological resources (i.e., avian species and their nests) that are protected by the MBTA and CFGC if active nests are present within or adjacent to the site during construction. Implementation of MM BR-2 would reduce potential impacts to nesting birds to less-than-significant levels by ensuring that pre-construction surveys are conducted to determine the presence or absence of nesting birds on or adjacent to the Project site prior to the commencement of construction activities. If active nests are discovered,				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
this mitigation measure establishes performance criteria that requires avoidance of the nests until it can be determined the nest is no longer active or that the juveniles from the occupied nests are capable of surviving independently of the nest.				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
Response: Implementation of the Project would result in the removal of trees on the Project site. The removal of trees is regulated by City of Moreno Valley Municipal Code Chapter 9.17.030, which requires development projects to conduct a tree survey prior to construction and, if any mature significant trees are to be removed, to replace each removed tree at defined ratios (as specified in Municipal Code Chapter 9.17.030). Prior to removal of any mature significant trees from the Project survey area, the Project Applicant would be required to comply with the provisions of Chapter 9.17.030 of the City of Moreno Valley Municipal Code. Mandatory compliance with the requirements of the Municipal Code would ensure the Project would not conflict with the City of Moreno Valley's ordinance regulating tree removal. In addition, the City of Moreno Valley Municipal Code contains provisions for the protection of the Stephens' Kangaroo Rat (refer to Title 8, Chapter 8.60 of the Municipal Code). The Project site is not located within an identified reserve area for the Stephens' Kangaroo Rat and the species was not observed during biological surveys of the Project site (MIG, 2020a, p. 16). Accordingly, the Project is exempt from the focused survey requirements for the Stephens' Kangaroo Rat established by the City's Municipal Code. The Project Applicant is required by the Municipal Code to contribute a local development impact and mitigation fee, which requires a fee payment to assist the City in implementing the habitat conservation plan for the Stephens' Kangaroo Rat. With mandatory compliance with standard regulatory requirements (i.e., development impact and mitigation fee payment), the proposed Project would not conflict with any City policies or ordinances related to the protection of the Stephens' Kangaroo Rat. (The Project's consistency with applicable provisions of the Stephens' Kangaroo Rat HCP are addressed in Response IV(f).) The City of Moreno Valley Municipal Code also contains provisions for the collection of mitigation fees to further the implementation of the Western Riverside County MSHCP (refer to Title 3, Chapter 3.48 of the Municipal Code). The Project Applicant is required by the Municipal Code to contribute a local mitigation fee, which requires a fee payment to assist the City in implementing the Western Riverside County MSHCP reserve system (including the acquisition, management, and long-term maintenance of sensitive habitat areas). With mandatory compliance with standard regulatory requirements (i.e., mitigation fee payment), the proposed Project would not conflict with any City policies or ordinances related to the mitigation fee program associated with Western Riverside County MSHCP. (The Project's consistency with applicable provisions of the MSHCP are addressed in Response IV(f).) The City of Moreno Valley does not have any additional policies or ordinances in place to protect biological resources that are applicable to the Project. Mandatory compliance with the above referenced Moreno Valley Municipal Code Chapters would ensure that implementation of the Project would result in a less than significant impact associated with local policies and ordinances.				
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: The Project site is subject to the provisions of the Western Riverside County MSHCP; however, the Project site is not located in a criteria cell or area plan subunit. The following analysis evaluates the Project's compliance with the Western Riverside County MSHCP requirements pursuant to the following sections of the MSHCP that are applicable to the Project site: Section 6.1.2, *Protection of Species Associated with Riparian/Riverine areas and Vernal Pools*; Section 6.1.3, *Protection of Narrow Endemic Plant Species*; Section 6.1.4, *Guidelines Pertaining to the Urban/Wildland Interface*; and Section 6.3.2, *Additional Survey Needs and Procedures*.				

Section 6.1.2 Species Associated with Riparian/Riverine Habitat and Vernal Pools

The Project survey area does not contain any MSHCP vernal pools or seasonal pools. The Project site does contain 0.59-acre of MSHCP riparian/riverine habitat, all of which would be removed by the Project (MIG, 2021b, p. 1). As required by the MSHCP, a Determination of Biologically Equivalent or Superior Preservation (DBESP) report is required in all instances where MSHCP riparian/riverine areas would be impacted by a development project. The goal of the DBESP report is to demonstrate that the development project provides mitigation that is biologically equivalent or superior to the existing conditions on a development site if left undisturbed. The Project's DBESP report is provided as *Technical Appendix B3*.

According to the Project's DBESP report, the purchase of habitat re-establishment and rehabilitation mitigation credits would be considered superior mitigation as compared to the preservation of the 0.59-acre of on-site MSHCP riparian/riverine habitat because the mitigation bank where the habitat credits would be purchased provide high quality habitat areas with habitat functions that are superior to the existing conditions at the Project site (MIG, 2021b, pp. 10-11). As such, with implementation of MM BR-3, the Project's significant impacts to MSHCP riverine and riparian areas would be reduced to less than significant and the Project would not conflict with Section 6.1.2 of the Western Riverside County MSHCP.

Section 6.1.3 Protection of Narrow Endemic Plants

The Project site is not located within the Western Riverside County MSHCP Narrow Endemic Plant Species Survey Area (NEPSSA); therefore, the NEPSSA requirements are not applicable to the Project and the Project is consistent with the Western Riverside County MSHCP narrow endemic plant species policies (MIG, 2020a, pp. 17-18).

Section 6.1.4 Urban/Wildlands Interface Guidelines

The Project site is not located within or adjacent to a Western Riverside County MSHCP Conservation Area; therefore, the Project site is not required to address Section 6.1.4 of the Western Riverside County MSHCP (MIG, 2020a, pp. 18-19).

Section 6.3.2 Additional Surveys and Procedures

The Project site is not located within the Western Riverside County MSHCP Criteria Area Plant Species Survey Area (CAPSSA); therefore, the CAPSSA requirements are not applicable to the Project. Additionally, the Project site is not located within the Western Riverside County MSHCP additional survey areas for amphibians, survey areas for mammals, or any special linkage areas; however, the Project site is located within the Western Riverside County MSHCP burrowing owl survey area (MIG, 2020a, pp. 17-18).

No evidence of use of the site by burrowing mammals was present and no burrows suitable for use by the owl was observed. The species is considered absent from the Project site and potential occurrence is low; however, a preconstruction burrowing owl survey in accordance with the Western Riverside County MSHCP Burrowing Owl Survey Requirements is required to ensure compliance with the Plan's provisions for protecting the burrowing owl (see MM BR-1). With implementation of MM BR-1, implementation of the Project would result in a less-than-significant impact to the burrowing owl. (MIG, 2020a, p. 18)

Additionally, the Project site is located within the Stephens' Kangaroo Rat Habitat Conservation Plan Fee Area, which is administered by the Riverside County Habitat Conservation Agency. The Project Applicant would be required to pay the Stephens' Kangaroo Rat, which is established at $500 per acre (MIG, 2020a, pp. 19-20; Riverside County, 1996, p. 53). Payment of the Stephens' Kangaroo Rat HCP fee is required – as noted in the analysis under Response IV(e) – and would ensure the Project is consistent with the Stephens' Kangaroo Rat HCP and the Western Riverside County MSHCP.

Sources:

1. MIG, 2020a, MSHCP General Biological Resources Assessment & Compliance Analysis, *Technical Appendix B1*
2. MIG, 2021a, Jurisdictional Delineation Report and Impact Analysis, *Technical Appendix B2*

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

3. MIG, 2021b, MSHCP Determination of Biologically Equivalent or Superior Preservation, *Technical Appendix B3*
4. MIG, 2020b, Burrowing Owl Focused Survey Report, *Technical Appendix B4*
5. MIG, 2020c, Least Bell's Vireo Focused Survey Report, *Technical Appendix B5*
6. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.9 – Biological Resources
     - Figure 5.9-2 – Planning Area Vegetation Community
7. Moreno Valley Municipal Code Chapter 3.48 – Western Riverside County Multiple Species Habitat Conservation Plan Fee Program
8. Moreno Valley Municipal Code Chapter 8.60 – Threatened and Endangered Species
9. Moreno Valley Municipal Code Section 14.40.040 – Public Tree Care
10. Moreno Valley Municipal Code Section 9.17.030 – Landscape Ordinance
11. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), http://www.wrc-rca.org/about-rca/multiple-species-habitat-conservation-plan/
12. Riverside County Information Technology – Map My County, https://gis.countyofriverside.us/Html5Viewer/?viewer=MMC_Public
13. Regional Conservation Agency – MSHCP Information Map, http://wrcrca.maps.arcgis.com/apps/webappviewer/index.html?id=a73e69d2a64d41c29ebd3acd67467abd
14. Riverside County Ordinance No. 633.10, https://www.rivcocob.org/ords/600/663.10.pdf

V. CULTURAL RESOURCES – Would the project:

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

Response: A cultural resources survey conducted for the Project site by Brian F. Smith and Associates (BFSA), which included a comprehensive site survey and archival records search, identified no historic resources on the Project site (BFSA, 2020a, p. 1.0-1). Additionally, the Project site is not identified as containing a historic resource by the City of Moreno Valley General Plan FEIR, Exhibit 5.10-1, *Locations of Listed Historic Resource Inventory Structures* (Moreno Valley, 2006b). Accordingly, the Project has no potential to impact a historical resource as defined by California Code of Regulations Section 15064.5.

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

Response: According to the cultural resources survey conducted by BFSA, no prehistoric archaeological resources were observed on the Project site during a comprehensive field survey and no prehistoric archaeological resources are known to exist within a one-mile radius of the Project site based on an archival records search conducted with the Eastern Information Center at the University of California, Riverside (BFSA, 2020a, pp. 5.0-1 to 5.0-5). Based on the findings of the field survey and archival research and due to historic disturbances on the Project site, BFSA concluded the Project site had a low likelihood for containing prehistoric archaeological resources (BFSA, 2020a, pp. 1.0-1 and 6.0-1). Based on the foregoing, the Project would result in less-than-significant impact to prehistoric archaeological resources defined by California Code of Regulations Section 15064.5.

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

Response: The Project site does not contain a cemetery, and no known formal cemeteries are located within the immediate site vicinity (Moreno Valley, 2006b, p. 1.0-1). Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with Project construction. If human remains are unearthed during Project construction, the construction contractor would be required by law to comply with California Health and Safety Code, Section 7050.5 "Disturbance of Human Remains." According to Subsections 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner is required to contact, by telephone within 24 hours, the Native American Heritage Commission

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

(NAHC). Pursuant to California Public Resources Code Section 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code Section 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials.

With mandatory compliance to California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, any potential impacts to human remains, including human remains of Native American descent, would be reduced to less than significant and mitigation is not required.

Sources:

1. California Health Code Section 7050.5 – Dead Bodies
2. Public Resources Code Section 5097.94(k) – Powers and Duties
3. Public Resources Code Section 5097.98 – Native American Historical, Cultural, and Sacred Sites
4. Moreno Valley General Plan, approved July 11, 2006
5. BFSA, 2020a, Phase I Cultural Resources Survey for the Compass Danbe Centerpointe Project, *Technical Appendix C*

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: The analysis below is based on the *Energy Analysis* (included as *Technical Appendix D* to this IS/MND) prepared for the proposed Project by Urban Crossroads and demonstrates that implementation of the Project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Energy Use During Construction

The Project's construction process would consume electricity and fuel. Project-related construction activities would represent a "single-event" demand and would not require on-going or permanent commitment of energy resources. Project construction is estimated to consume approximately 85,609 kWh of electricity, approximately 36,736 gallons of diesel fuel from operation of construction equipment, 15,941 gallons of diesel fuel from construction vendor trips, and 26,278 gallons of fuel from construction worker trips (Urban Crossroads, 2020c, p. 36). The amount of energy and fuel use anticipated by the Project's construction activities are typical for the type of scale of construction proposed by the Project and there are no aspects of the Project's proposed construction process that are unusual or energy-intensive. Furthermore, construction equipment would be required to conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies. For example, CCR Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. As supported by the preceding discussion, the Project's construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. (Urban Crossroads, 2020c, p. 31) Impacts during Project construction would be less than significant.

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

Energy Use Project Operations

Energy that would be consumed by Project-related traffic is a function of total vehicle miles traveled and the estimated vehicle fuel economies of vehicles accessing the Project site. The Project would result in 5,292,177 annual vehicle miles traveled and an estimated annual fuel consumption of 405,743 gallons of fuel (Urban Crossroads, 2020c, p. 34). The number of daily trips and miles traveled by Project traffic are consistent with other industrial uses of similar scale and configuration in the Inland Empire. That is, the Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and/or vehicle miles traveled, nor associated excess and wasteful vehicle energy consumption (Urban Crossroads, 2020c, p. 37). Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of passenger vehicles to alternative energy sources (e.g., electricity, natural gas, bio fuels, hydrogen cells) would likely decrease future gasoline fuel demands per mile traveled. The location of the Project site proximate to regional and local arterial roadways (e.g., I-215 and SR-60) is expected to minimize the Project vehicle miles traveled within the region. Based on the foregoing, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary (Urban Crossroads, 2020c, p. 38).

Building operations and site maintenance activities associated with the Project would result in the consumption of natural gas and electricity. Natural gas would be supplied to the Project by Southern California Gas Company; electricity would be supplied to the Project by Moreno Valley Utility (MVU). Energy demands resulting from Project operations are estimated at 6,438,204 kilo-British thermal units (kBTU) per year of natural gas and 5,261,115 Kilowatt-hour (kWh) per year of electricity (Urban Crossroads, 2020c, p. 35). The Project provides conventional industrial buildings uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the Project are not inherently energy intensive, and the Project energy demands in total would be comparable to, or less than, other industrial projects of similar scale and configuration (Urban Crossroads, 2020c, pp. 37-38). Additionally, the Project would be required to comply with Title 24 standards, which would ensure that the Project's energy demand would not be considered inefficient, wasteful, or otherwise unnecessary (ibid.).

Based on the foregoing analysis, Project operations would result in a less-than-significant impact to energy resources.

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

Response: The following section analyzes the Project's consistency with the applicable federal and State regulations. As supported by the proceeding analysis, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and a less-than-significant impact would occur.

Consistency with Federal Energy Regulations

Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

Transportation and access to the Project site is provided primarily by the local and regional roadway systems, which includes I-215, SR-60, and Alessandro Boulevard. Implementation of the Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project site (Urban Crossroads, 2020c, p. 39).

The Transportation Act for the 21st Century (TEA-21)

The Project site is located along major transportation corridors with proximate access to the interstate freeway system (i.e., I-215). The site selected for the Project facilitates access, acts to reduce vehicle miles traveled (VMT), takes advantage of existing infrastructure systems, and promotes land use compatibilities through collocation of similar uses. The Project supports the strong planning processes emphasized under TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21 (Urban Crossroads, 2020c, p. 39).

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

Consistency with State Energy Regulations

Integrated Energy Policy Report (IEPR)
Electricity would be provided to the Project by MVU and natural gas would be provided by SoCalGas. The MVU and SoCal Gas energy supplies comply with and build off existing State programs and policies. As such, the Project is consistent with, and would not otherwise interfere with, nor obstruct implementation the goals presented in the IEPR (Urban Crossroads, 2020c, p. 39).

State of California Energy Plan
The Project site is located along Alessandro Boulevard, east of Frederick Street, with proximate access to Interstate 215. The location of the Project site facilitates access, acts to reduce VMT, takes advantage of existing infrastructure systems, and promotes land use compatibilities through the introduction of industrial uses on a site surrounded by industrial and commercial uses. Therefore, the Project supports urban design and planning processes identified under the State of California Energy Plan, is consistent with, and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan (Urban Crossroads, 2020c, p. 39).

California Code Title 24, Part 6, Energy Efficiency Standards
The Project would design building shells and building components, such as windows; roof systems: electrical and lighting systems: and heating, ventilating, and air conditioning systems to meet 2019 Title 24 Standards. The Project also is required by State law to be designed, constructed, and operated to meet or exceed Title 24 Energy Efficiency Standards. On this basis, the Project is determined to be consistent with, and would not interfere with, nor otherwise obstruct implementation of Title 24 Energy Efficiency Standards

Pavley Fuel Efficiency Standards (AB 1493)
AB 1493 is applicable to the Project because model year 2009-2016 passenger cars and light duty truck vehicles traveling to and from the Project site are required by law to comply with the legislation's fuel efficiency requirements. On this basis, the Project is determined to be consistent, with, and would not interfere with, nor otherwise obstruct implementation of AB 1493.

Advanced Clean Cars Program
The Advanced Clean Cars Program is applicable to the Project because model year 2017-2025 passenger car vehicles traveling to and from the Project site are required by law to comply with the legislation's fuel efficiency requirements. On this basis, the Project is determined to be consistent, with, and would not interfere with, nor otherwise obstruct implementation of California's Advanced Clean Cars Program.

California Renewable Portfolio Standards (SB 1078)
Energy directly or indirectly supplied to the Project site by electric corporations is required by law to comply with SB 1078.

Sources:

1. Urban Crossroads, 2020c, Compass Danbe Centerpointe Energy Analysis, *Technical Appendix D*

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	☐	☐	☐	☒

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Response: There are no Alquist-Priolo Earthquake Fault Zones affecting the Project site (NorCal Engineering, 2020, p. 4). The nearest Earthquake Fault Zone is the San Jacinto Fault, which occurs approximately 3.7 miles southeast of the Project site (Google Earth Pro, 2020; Moreno Valley, 2006a, Figure 6-3). Because there are no known faults located on the Project site, there is no potential for the Project to expose people or structures to adverse effects related to ground rupture. No impact would occur.				
ii) Strong seismic ground shaking?	☐	☐	☒	☐
Response: The Project site is located in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. This risk is not considered substantially different than that of other similar properties in the southern California area. As a mandatory condition of Project approval, the Project would be required to construct the proposed warehouse buildings in accordance with the California Building Standards Code (CBSC), also known as California Code of Regulations (CCR), Title 24 (Part 2), and the City of Moreno Valley Building Code, which is based on the CBSC with local amendments. The CBSC and City of Moreno Valley Building Code (Moreno Valley Municipal Code, Chapter 8.20) provide standards that must be met to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures, and have been specifically tailored for California earthquake conditions. In addition, the CBSC (Chapter 18) and the City of Moreno Valley Building Code (Chapter 8.21) require development projects to prepare geologic engineering reports to identify site-specific geologic and seismic conditions and implement the site-specific recommendations contained therein to preclude adverse effects involving unstable soils and strong seismic ground-shaking, including, but not limited to, recommendations related to ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems. The Project Applicant has commissioned such a report titled, *Geotechnical Investigation – Proposed Warehouse Building Development* (NorCal Engineering, 2020), which is included as *Technical Appendix E* to this IS/MND, and the City would condition the Project to comply with the site-specific ground preparation and construction recommendations contained in the report. With mandatory compliance with these standards and site-specific design and construction measures set forth in the Project's geotechnical report, potential impacts related to seismic ground shaking would be less than significant. As such, implementation of the Project would not expose people or structures to substantial adverse effects, including loss, injury, or death, involving seismic ground shaking. Impacts would be less-than-significant.				
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
Response: According to General Plan FEIR Figure 5.6-2, *Seismic Hazards*, the Project site is not located in an area with the potential for liquefaction. The geotechnical investigation prepared for the Project site concludes that based on observed subsurface conditions, the potential for liquefaction at the Project site is low due to the characteristics of on-site soils and the depth of the groundwater table beneath the site (greater than 50 feet below the surface) (NorCal Engineering, 2020, pp. 5-6). Regardless, the City of Moreno Valley will require that the property be developed in accordance with the latest applicable seismic safety guidelines, including the standard requirements of the CBSC and the City of Moreno Valley Municipal Code Building Code, to minimize potential liquefaction hazards. Therefore, implementation of the Project would not directly or indirectly expose people or structures to substantial hazards associated with seismic-related ground failure and/or liquefaction hazards. Impacts would be less than significant.				
iv) Landslides?	☐	☐	☒	☐
Response: The Project site is generally flat and contains no substantial natural or man-made slopes under existing conditions. There are no substantial natural or man-made slopes in the Project site vicinity, either. Accordingly, development on the subject property would not be exposed to landslide risks, and the Project would not pose a landslide risk to surrounding properties; a less-than-significant impact would occur.				
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
Response: The analysis below summarizes the likelihood of the Project to result in substantial soil erosion during temporary construction activities and/or long-term operation.				

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

Construction-Related Impacts

Construction of the Project would involve grading, paving, utility installation, building construction, and landscaping installation, which has the potential to temporarily expose on-site soils that would be subject to erosion during rainfall events or high winds. Pursuant to State Water Resources Control Board requirements, the Project Applicant is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for construction activities, including proposed grading. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one (1) acre of total land area. In addition, the Project would be required to comply with the Santa Ana RWQCB's *Santa Ana River Basin Water Quality Control Program*. Compliance with the NPDES permit and the Santa Ana River Basin Water Quality Control Program involves the preparation and implementation of a SWPPP for construction-related activities. The SWPPP will specify the Best Management Practices (BMPs) that would be required to be implemented during construction activities to ensure that waterborne pollution – including erosion/sedimentation – is prevented, minimized, and/or otherwise appropriately treated prior to surface runoff being discharged from the subject property. Examples of BMPs that may be utilized during construction include, but are not limited to, sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, and hydro-seeding. In addition, the Project would be required to comply with SCAQMD Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion (SCAQMD, 2005). With mandatory compliance to the requirements noted in the Project's SWPPP, as well as applicable regulatory requirements, the potential for water and/or wind erosion impacts during Project construction would be less than significant and mitigation is not required.

Long-Term Operational Activities

Following construction, wind and water erosion on the Project site would be minimized, because the areas disturbed during construction would be landscaped or covered with impervious surfaces and drainage would be controlled through a storm drain system. Implementation of the Project would result in less long-term erosion and loss of topsoil than occurs under the site's existing conditions.

The City's MS4 NPDES Permit requires the Project Applicant to prepare and submit to the City for approval a Water Quality Management Plan (WQMP) (refer to Moreno Valley Municipal Code Section 8.21.170). The WQMP is required to identify an effective combination of erosion control and sediment control measures (i.e., BMPs) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges. The WQMP also is required to establish a post-construction implementation and maintenance plan to ensure on-going, long-term erosion protection. Compliance with the WQMP will be required as a condition of approval for the Project, as would the long-term maintenance of erosion and sediment control features. The preliminary WQMP for the Project prepared by Thatcher Engineering and Associates, Inc. (Thatcher) (attached hereto as *Technical Appendix I1*) incorporates design features would be effective at removing silt and sediment from storm water runoff. Because the Project would be required to utilize erosion and sediment control measures to preclude substantial, long-term soil erosion and loss of topsoil, the Project would result in less-than-significant impacts related to soil erosion.

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

Response: The Project's geotechnical report (*Technical Appendix E*) indicates that the settlement potential would be attenuated through the proposed removal of near surface soils down to competent materials and replacement with properly compacted fill, which is included as a recommendation in the Project's geotechnical report. Additionally, only minor ground subsidence (±0.2 feet) is expected to occur in the soils below the zone of removal, due to earthwork operations (NorCal Engineering, 2020, p. 9). Through standard conditions of approval in accordance with Moreno Valley Municipal Code Section 8.21.050, the proposed Project would be required by the City to incorporate the recommendations contained within the Project geotechnical report into the grading plan for the Project (Moreno Valley, n.d.). As such, implementation of the Project would result in less-than-significant impacts associated with soil shrinkage/subsidence and collapse.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
As discussed in Responses VII (a), (iii) and (iv), development of the property as proposed by the Project would result in a less than significant impact involving ground failure, including liquefaction and landslide, and a less-than-significant impact involving landslides.				
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: According to USDA's Web Soil Survey, the Project site is underlain with Monserate sandy loam 0 to 5 percent slopes, and expansion potential is "very low" to "medium" (USDA, n.d.; NorCal Engineering, 2020, Table II). The expansive characteristics of on-site soils would be attenuated by implementation of the foundation and floor slab design recommendations included in the Project's geotechnical report, which the City will require as a condition of approval pursuant to Section 9.08.080 of the Moreno Valley Municipal Code (NorCal Engineering, 2020, pp. 7-14). According to the above, implementation of the Project would result in less-than-significant impacts associated with expansive soils and would not create substantial risks to life or property.				
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: The Project does not propose the use of septic tanks or alternative waste water disposal systems. Accordingly, no impact would occur.				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
Response: The Project site does not contain any known unique geologic features (BFSA, 2020b, p. 6). However, the Project site is underlain by lower Pleistocene (approximately 1.8 million to 200,000 years old), very old, sandy alluvial fan deposits that have a high paleontological sensitivity for fossils of large, terrestrial Ice Age vertebrates (BFSA, 2020b, p. 6). In the event that Project grading and excavation activities encroach into previously undisturbed Pleistocene-age alluvial deposits, the Project could result in impacts to important paleontological resources that may exist below the ground surface if they are unearthed and not properly protected. Therefore, the Project's potential to directly or indirectly destroy a unique paleontological resource buried beneath the ground surface is determined to be a significant impact and mitigation is required. Implementation of MM GEO-1 through MM GEO-4 would ensure the proper identification and subsequent treatment of any paleontological resources that may be encountered during ground-disturbing activities associated with implementation of the proposed Project. Therefore, with implementation of MM GEO-1 through MM GEO-4, the Project's potential impacts related to paleontological resources would be reduced to a less-than-significant level. **Mitigation** MM GEO-1 Prior to the issuance of a grading permit, the Project Applicant shall provide evidence to the City of Moreno Valley that a qualified paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed. MM GEO-2 The paleontological monitor shall conduct full-time monitoring during grading and excavation operations in undisturbed, very old alluvial fan sediments at depths exceeding five feet below the existing ground surface and shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontological monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be				

reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified paleontological personnel to have a low potential to contain or yield fossil resources.

MM GEO-3 Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the Western Science Museum in Hemet, California, is required for significant discoveries.

MM GEO-4 A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Moreno Valley prior to building final.

Sources:

1. NorCal Engineering, 2020, Geotechnical Investigation, *Technical Appendix E*
2. BFSA, 2020b, Paleontological Assessment, *Technical Appendix H*
3. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.6 – Geology and Soils
     - Figure 5.6-2 – Seismic Hazards
   - Section 5.10 – Cultural Resources
     - Figure 5.10-3 – Paleontological Resource Sensitive Areas
4. Moreno Valley Municipal Code Section 8.20 – Moreno Valley Building Code
5. Moreno Valley Municipal Code Section 9.08.160 – Seismic Hazards
6. Moreno Valley Municipal Code Section 8.21.050 – Grading Permit Requirements
7. Moreno Valley Municipal Code Section 9.08.080 – Grading

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: A *Greenhouse Gas Analysis* (Urban Crossroads, 2020d) was prepared for the Project by Urban Crossroads to quantify the greenhouse gas (GHG) emissions that would result from Project-related construction and operational activities. This report is included as *Technical Appendix F* to this IS/MND and its findings are incorporated into the analysis presented herein.

While estimated Project-related GHG emissions can be calculated, the direct impacts of such emissions on Global Climate Change (GCC) and global warming cannot be determined on the basis of available science because global climate change is a global phenomenon and not limited to a specific locale such as the Project site and its immediate vicinity. Furthermore, there is no evidence that would indicate that the emissions from a project the size of the proposed Project could directly or indirectly affect the global climate. Because global climate change is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would not result in a direct impact to global climate change; rather, Project-related impacts to global climate change only could be potentially significant on a cumulative basis. (Urban Crossroads, 2020d, p. 8) Therefore, the analysis below focuses on the Project's potential to contribute to global climate change in a cumulatively-considerable way.

The City of Moreno Valley has not adopted a numerical threshold for determining the significance of GHG emissions; however, the City has discretion to select an appropriate significance criterion used by other agencies, based on substantial evidence (Urban Crossroads, 2020d, p. 39). Specifically, the City has selected to compare Project-related GHG emissions against the draft 10,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year threshold recommended by SCAQMD staff for industrial projects against where SCAQMD is the lead agency. The industrial threshold utilized by SCAQMD is a widely accepted threshold used by numerous lead agencies in the South Coast Air Basin (SCAB) and was established based on the recommendations from California Air Pollution Control Officers Association

(CAPCOA) contained in a report titled "CEQA and Climate Change" (dated January 2008), which serves as a resource for public agencies as they establish agency procedures for reviewing GHG emissions from projects under CEQA. The CAPCOA report provides three recommendations for evaluating a development project's GHG emissions. When establishing their significance threshold, SCAQMD selected the CAPCOA non-zero approach which establishes a numerical threshold based on capture of approximately 90 percent of emissions from future development (Approach 2, Threshold 2.5). A 90 percent emission capture rate means that 90 percent of total emissions from all new or modified projects would be subject to evaluation under CEQA. Based on SCAQMD's research of 1,297 major, industrial source point (i.e., stationary) emission sources in the SCAB, SCAQMD found that source point industrial facilities that generate at least 10,000 MTCO2e per year produce approximately 90 percent of the carbon dioxide equivalent emissions in the SCAB per year. As such, SCAQMD established their significance criterion at 10,000 MTCO2e as that threshold would capture 90 percent of total emissions from future industrial development in accordance with CAPCOA recommendations. (CAPCOA, 2008, pp. 46-47) If Project-related GHG emissions do not exceed the 10,000 $MTCO_2e$ per year threshold, then Project-related GHG emissions would clearly have a less-than-significant impact. On the other hand, if Project-related GHG emissions exceed 10,000 $MTCO_2e$ per year, the Project would be considered a substantial source of GHG emissions.

The Project's annual GHG emissions are summarized in Table 7, *Total Annual Project Greenhouse Gas Emissions*. The methodology used to calculate the Project's GHG emissions is described in detail in *Technical Appendix F*.

Table 7: Total Annual Project Greenhouse Gas Emissions

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Annual construction-related emissions amortized over 30 years	26.37	0.00	0.00	26.46
Area Source	0.02	5.00E-05	0.00	0.02
Energy Source	2,019.87	0.08	0.02	2,027.91
Mobile Source (Passenger Cars)	758.61	0.02	0.00	759.02
Mobile Source (Trucks)	3,038.11	0.05	0.00	3,039.35
On-Site Equipment Source	101.58	0.03	0.00	102.41
Waste	75.66	4.47	0.00	187.44
Water Usage	409.48	3.00	0.07	506.56
Total CO_2e (All Sources)	**6,649.16**			

Source: (Urban Crossroads, 2020d, Table 3-6)

As shown in Table 7, the Project is estimated to generate approximately 6,649.16 $MTCO_2e$ annually, which is less than the significance threshold of 10,000 $MTCO_2e$ (Urban Crossroads, 2020d, p. 48). Because the Project's total annual GHG emissions would not exceed 10,000 $MTCO_2e$, the Project would not generate substantial GHG emissions – either directly or indirectly – that would have a significant impact on the environment. Impacts would be less than significant.

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

Response: The Project would comply with a number of regulations, policies, plans, and policy goals that would reduce GHG emissions, including the Assembly Bill 32 (AB 32), and Senate Bill 32 (SB 32), which are regulations applicable to the Project. For more information on these regulations as well as other state-wide plans, policies, and regulations associated with GHG emissions that are not applicable to the Project, refer to *Technical Appendix F* of this IS/MND.

On October 9, 2012, the Moreno Valley City Council approved an Energy Efficiency and Climate Action Strategy and related GHG analysis. The Energy Efficiency and Climate Action Strategy document identifies potential programs and policies to reduce overall City energy consumption and increase the use of renewable energy. The majority of the policies are directed at municipal operations of the City,

but the document also contains recommended policies for the community at large (including private development projects). These recommended policies include but are not limited to: energy efficiency, water use reduction, trip reduction, solid waste diversion, and educational policies. The overall goal of the Energy Efficiency and Climate Action Strategy is to ensure that the City is consistent with and would not otherwise conflict with the provisions of AB 32. As demonstrated by the analysis below, the Project would not conflict with the provisions of AB 32 and, therefore, would not obstruct implementation of the components of the City's Energy Efficiency and Climate Action Strategy that are applicable to the Project.

CARB identified measures in their 2017 Scoping Plan Update to identify the measures that would achieve the emissions reductions goals of SB 32. As explained in point-by-point detail in Section 3.8 of *Technical Appendix F* (refer to Table 3-7), the Project would not conflict with applicable measures of the 2017 Scoping Plan Update and would not preclude/obstruct implementation of the Scoping Plan Update (Urban Crossroads, 2020d, Table 3-8).

In April 2015, Governor Edmund Brown Jr. signed Executive Order B-30-15, which advocated for a statewide GHG-reduction target of 40 percent below year 1990 levels by 2030 and 80 percent below 1990 levels by 2050. In September 2016, Governor Brown signed the Senate Bill (SB) 32. SB 32 formally established a statewide goal to reduce GHG emissions to 40 percent below year 1990 levels by 2030. To date, no statutes or regulations have been adopted to translate the year 2050 GHG reduction goal into comparable, scientifically-based statewide emission reduction targets.

According to research conducted by the Lawrence Berkeley National Laboratory and supported by the CARB, California, under its existing and proposed GHG reduction policies (i.e., CARB Scoping Plan), is on track to meet the years 2020 and 2030 reduction targets established by AB 32 and SB 32, respectively (Urban Crossroads, 2020d, p. 27). As described above, the Project would not conflict with or obstruct implementation of the CARB Scoping Plan; therefore, the Project would not interfere with the State's ability to achieve the year 2030 GHG-reduction target established by SB 32.

Rendering a significance determination for year 2050 GHG emissions relative to EO B-30-15 would be speculative because EO B-30-15 establishes a goal more than three decades into the future; no agency with GHG subject matter expertise has adopted regulations to achieve these statewide goals at the project-level; and, available analytical models cannot presently quantify all project-related emissions in those future years. Further, due to the technological shifts anticipated and the unknown parameters of the regulatory framework in 2050, available GHG models and the corresponding technical analyses are subject to limitations for purposes of quantitatively estimating the Project's emissions in 2050.

As described above, the Project would not conflict with the State's ability to achieve the State-wide GHG reduction mandates and would be consistent with applicable policies and plans related to GHG emissions reductions. Impacts would be less than significant.

Sources:

1. Urban Crossroads, 2020d, Greenhouse Gas Analysis, *Technical Appendix F*

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: A Phase I Environmental Site Assessment (ESA) was prepared for the Project site by Partner Engineering and Science, Inc. (Partner) and is included as *Technical Appendix G* to this IS/MND. As part of the Phase I ESA efforts, Partner conducted a visual inspection of the Project site, researched regulatory hazardous materials databases, reviewed historical reference materials (including aerial photographs, topographic maps, and City of Moreno Valley directories), and interviewed people with historical links to the Project site; the findings of this research are incorporated into the analysis presented herein.

Existing Site Conditions Impacts

There were no underground or aboveground storage tanks, drain lines, sumps, ponds, pits, lagoons, stressed vegetation, wells, transformers, or mold found on the Project site (Partner, 2019, pp. 17-18). Based on a review of historic regulatory agency hazardous materials databases, historic site aerial photographs, interviews with current property owners, and a reconnaissance of the Project site, Partner determined that the Project site does not contain any recognized environmental conditions (RECs), historic recognized environmental conditions, or other environmental issues (Partner, 2019, p. 21). A REC is defined as "the presence or likely presence of any hazardous substances 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" (ibid.). A HREC is defined as "past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the application regulatory authority" (ibid).

Based on the foregoing analysis, the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials from the Project site under existing conditions. A less-than-significant impact would occur.

Construction-Related Impacts

Heavy equipment (e.g., dozers, excavators, tractors) would be operated on the subject property during construction of the Project. Heavy equipment is typically fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the Environmental Protection Agency (EPA), California Department of Toxic Substances Control (DTSC), South Coast Air Quality Management District (SCAQMD), and Santa Ana RWQCB. With mandatory compliance with applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

Long-Term Operational Impacts

The future building occupant(s) for the Project site are not yet identified; however, the Project is designed to house warehouse distribution occupants and it is possible that hazardous materials could be used during the course of a future building user's daily operations. State and federal Community-Right-to-Know laws allow the public access to information about the amounts and types of chemicals in use at local businesses. Laws also are in place that requires businesses to plan and prepare for possible chemical emergencies. Any business that occupies a building on the Project site and that handles hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) will require a permit from the Moreno Valley County Fire Department Hazardous Materials Division in order to register the business as a hazardous materials handler. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the County of Riverside Fire Department and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business. In addition, any business handling at any one time, greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic feet of gaseous hazardous material, is required, under Assembly Bill 2185 (AB 2185), to file a Hazardous Materials Business Emergency Plan (HMBEP). A HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If businesses that use or store hazardous materials occupy the Project, the business owners and operators would be required to comply with all applicable federal, state, and local regulations to ensure proper use, storage, use, emission, and disposal of hazardous substances (as described above). With mandatory regulatory compliance, the Project is not expected to pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. With mandatory regulatory compliance, potential hazardous materials impacts associated with long-term operation of the Project are determined to be less than significant and mitigation is not required.				
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: Accidents involving hazardous materials that could pose a significant hazard to the public or the environment would be highly unlikely during the construction and long-term operation of the Project and are not reasonably foreseeable. As discussed above under Response IX(a), the transport, use, and handling of hazardous materials on the Project site during construction is a standard risk on all construction sites, and there would be no greater risk for upset and accidents than would occur on any other similar construction site. Upon buildout, the Project site would operate as a warehouse distribution center. Based on the operational characteristics of warehouse distribution centers, it is possible that hazardous materials could be used during the course of a future occupant's daily operations; however, as discussed above under Response IX(a), the Project Applicant would be required to comply with all applicable local, State, and federal regulations related to the transport, handling, and usage of hazardous material. Accordingly, impacts associated with the accidental release of hazardous materials would be less than significant during both construction and long-term operation of the Project and mitigation would not be required.				
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: There are no schools located within 0.25-mile of the Project site (Google Earth Pro, 2020). Thus, the Project would not have a significant effect in emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. 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: The Phase I ESA (*Technical Appendix G* to this IS/MND) prepared for the Project site included a search of regulatory databases, including the California EPA's Regulated Site Portal, the Santa Ana RWQCB's Geotracker database, and DTSC's EnviroStor database (EDR). The Project site is identified on the EDR database as situated within the former Department of Defense (DOD) boundary of March Air Force Base; however, the Project site is not mapped within a national priority list (NPL) or area of concern associated with the Base (Partner, 2019, p. 13). Accordingly, this listing is not expected to represent a significant environmental concern to the Project site and would not create a significant hazard to the public or the environment. The Project site is not included on any other list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. 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
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: The Project site is located approximately 1.1 miles southwest of the March Air Reserve Base/Inland Port Airport (MARB/IPA). Pursuant to the March Air Reserve Base Compatible Use Zone Study commissioned by the United States Air Force and as depicted on Figure 6-5, *Air Crash Hazards*, of the Moreno Valley General Plan, the Project site is not located within a zone subject to hazards related to air crashes (Moreno Valley, 2006a). According to the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, the western portion of the Project site is located in Compatibility Zone E and the eastern portion of the Project site is located within Compatibility Zone D (RCALUC, 2014, Map MA-1). Properties located in Zone D and E are subject to safety risks associated with aircraft operations, but the potential hazards are sufficiently minimal that land use restrictions are generally unnecessary (RCALUC, 2014, Table MA-1). Thus, the light industrial land uses proposed by the Project are permitted in Zone D and E by the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (ALUCP) and were determined by the ALUC to be consistent with the ALUCP during their January 14, 2021 public meeting. The industrial warehouse buildings proposed by the Project would be no greater than 50 feet tall and does not include an air travel component (e.g., runway, helipad); therefore, would not interfere with flight operations at the March Air Reserve Base. The Project would not result in safety hazards for people residing or working in the Project area. Impacts would be less than significant, and mitigation is not required.

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

Response: The Project site does not contain any emergency facilities under existing conditions nor does it serve as an emergency evacuation route, so there is no potential for the Project to adversely affect an existing emergency response or evacuation plan. During construction and at Project buildout, the proposed Project would be required to maintain adequate emergency access for emergency vehicles as required by the City. As part of the City's discretionary review process, the City of Moreno Valley reviewed the Project to ensure that appropriate emergency ingress and egress would be available to-and-from the proposed warehouse buildings for public safety, and determined that the Project would not substantially impede emergency response times in the local area. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.

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

Response: According to City of Moreno Valley General Plan FEIR Figure 5.5-2, *Floodplains and High Fire Hazard Areas*, the Project site is not located in an area of substantial or high fire risk (Moreno Valley, 2006b). Additionally, the California Department of Forestry and Fire Protection (CalFire) identifies the Project site location as within a Non-Very High Fire Hazard Severity Zone (CalFire, 2009). The Project site is located in an area that has been largely developed. No wildlands are located on or adjacent to the Project site and the Project site is largely disturbed or devoid of vegetation and surrounded on all sides by developed or maintained properties and a paved road. Thus, implementation of the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Impacts would be less than significant.

Sources:

1. Partner Engineering and Science, Inc., 2019, Phase I Environmental Site Assessment, *Technical Appendix G*
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006

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

- Section 5.5 – Hazards and Hazardous Materials
  - Figure 5.5-3 – City Areas Affected by Aircraft Hazard Zones

3. Google Earth Pro
4. Moreno Valley General Plan, approved July 11, 2006
5. Riverside County Airport Land Use Commission, March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700
6. California Department of Forestry and Fire Protection (CalFire), https://osfm.fire.ca.gov/media/5917/moreno_valley.pdf

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 Project would be required to comply with Section 402 of the Clean Water Act, which authorizes the National Pollution Discharge Elimination System (NPDES) permit program that covers point sources of pollution discharging to a water body. The NPDES program also requires operators of construction sites one-acre or larger to prepare a Storm Water Pollution Prevention Plan (SWPPP) and obtain authorization to discharge stormwater under an NPDES construction stormwater permit. The Project Applicant also would be required to comply with the California Porter-Cologne Water Quality Control Act (Section 13000 et seq., of the California Water Code), which requires that comprehensive water quality control plans be developed for all waters within the State of California. The Project site is located within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB).

Construction-Related Impacts

Construction of the proposed Project would involve clearing, grading, paving, utility installation, building construction, and landscaping activities. Construction activities would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and solvents, and other chemicals with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures.

Pursuant to the requirements of the Santa Ana RWQCB and the City Moreno Valley (Municipal Code Chapter 8.10 et seq. and Section 8.21.170), the Project would be required to obtain coverage under the State's General Construction Storm Water Permit (NPDES Permit). The NPDES permit is required for all projects that include construction activities, such as clearing, soil stockpiling, grading, and/or excavation that disturb at least one (1) acre of total land area. In addition, the Project would be required to comply with the Santa Ana RWQCB's *Santa Ana River Basin Water Quality Control Program*. Compliance with the NPDES permit and the *Santa Ana River Basin Water Quality Control Program* involves the preparation and implementation of a SWPPP for construction-related activities, including grading. The SWPPP will specify the Best Management Practices (BMPs) that the Project would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Examples of BMPs that may be utilized during construction include, but are not limited to, sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, and hydro-seeding. Mandatory compliance with the SWPPP would ensure that the Project's construction does not violate any water quality standards or waste discharge requirements. Therefore, water quality impacts associated with construction activities would be less than significant and no mitigation measures would be required.

Post-Development Water Quality Impacts

Stormwater pollutants commonly associated with the land uses proposed by the Project include bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash and debris, and oil and grease. Based on current receiving water impairments (pursuant to the Clean Water Act's (CWA)

Section 303(d) list), the Project's pollutants of concern are bacterial indicators, nutrients, pesticides, and sediments (Thatcher, 2020, Table E.1).

Pursuant to the Moreno Valley Municipal Code (Chapter 8.10 *et seq.* and Section 8.21.170), the Project Applicant would be required to implement a Water Quality Management Plan (WQMP) to demonstrate compliance with the City's NPDES municipal stormwater permit, and to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters. The WQMP is a site-specific post-construction water quality management program designed to address the pollutants of concern of a development project via BMPs, implementation of which ensures the on-going protection of the watershed basin. The Project's Preliminary WQMP, prepared by Thatcher, is included as *Technical Appendix I1* appended to this IS/MND. As identified in the Project's Preliminary WQMP, the proposed Project is designed to include structural source control BMPs (including bioretention swales, two underground detention systems and two modular wetlands units) as well as operational source controls (including but not limited to: drainage system maintenance, storm drain system stenciling and signage, and implementation of minimal pesticide use) to minimize, prevent, and/or otherwise appropriately treat stormwater runoff flows before they are discharged from the site. Compliance with the WQMP would be required as a condition of Project approval pursuant to Municipal Code Chapter 8.10 and Municipal Code Section 8.21.170, and long-term maintenance of on-site BMPs would be required to ensure their long-term effectiveness. Therefore, water quality impacts associated with long-term operational activities would be less than significant.

In addition to the WQMP, the NDPES program also requires certain land uses, including industrial land uses as proposed by the Project, to prepare a SWPPP for operational activities and to implement a long-term water quality sampling and monitoring program, unless an exemption has been granted. On April 1, 2014, the California State Water Resources Control Board adopted an updated new NPDES permit for stormwater discharge associated with industrial activities (referred to as the "Industrial General Permit"). The new Industrial General Permit, which is more stringent than the existing Industrial General Permit, became effective on July 1, 2015. Under the effective NPDES Industrial General Permit, the Project would be required to prepare a SWPPP for operational activities and implement a long-term water quality sampling and monitoring program or receive an exemption. Because the permit is dependent upon the operational activities of the buildings, and the Project's future building occupants and their operations are not known at this time, details of the SWPPP (including BMPs) or potential exemption to the SWPPP operational activities requirement cannot be determined at this time. However, based on the requirements of the NPDES Industrial General Permit, it is anticipated that the Project's mandatory compliance with all applicable regulations would further reduce potential water quality impacts during long-term operation.

Based on the foregoing analysis, the Project would not violate any water quality standards or waste discharge requirements during long-term operation. Impacts would be less than significant.

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

Response: No potable groundwater wells are proposed by the Project. The proposed Project would be served with potable water by the Eastern Municipal Water District (EMWD). The EMWD relies on local potable groundwater as a source of its water supply (in addition to imported water from the Metropolitan Water District of Southern California, desalted ground water, and recycled water). The EMWD has indicated it has sufficient available water resources, including groundwater resources, to adequately serve the Project in addition to past, present, and future commitments to supply water (EMWD, 2016a, pp. XIV-XVI). Therefore, the proposed Project would not substantially deplete groundwater supplies and the Project's impact to groundwater supplies would be less than significant.

Development of the Project would increase impervious surface coverage on the property, which would reduce the amount of water percolating down into the underground aquifer that underlies the Project site and a majority of the City. However, and as noted in the City's General Plan EIR, "the impact of an incremental reduction in groundwater would not be significant as domestic water supplies are not reliant

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

on groundwater as a primary source" (Moreno Valley, 2006b, p. 5.7-12). Additionally, water captured by the proposed Project's underground detention systems and landscaped areas would have the opportunity to percolate into the ground. With buildout of the Project, the local groundwater levels would not be substantially adversely affected. Accordingly, buildout of the Project would not interfere substantially with groundwater recharge.

For the reasons stated above, the Project would neither substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. 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?	☐	☐	☒	☐

Response: Under existing conditions, the Project site primarily drains in southerly direction, ultimately discharging to two existing storm drains at the southwest and southeast corners of the Project site (Thatcher, 2021, p. 6).

The Project would mass grade the entire property and construct two industrial warehouse buildings and associated improvements, which would change the site's existing ground contours and alter the existing drainage patterns interior to the Project site. However, upon buildout of the Project, stormwater flow generated on the Project site would continue to be conveyed to the two existing storm drains adjacent south of the southern Project site boundary.

Although the Project would alter the subject property's internal drainage patterns, such changes would not result in substantial erosion or siltation on- or off-site. Under post-development conditions, a majority of the site would be covered with impervious surfaces and, therefore, the amount of exposed soils on the Project site would be minimal. Also, as discussed under Response X(a), the Project would construct an integrated storm drain system on-site with BMPs to minimize the amount of water-borne pollutants carried from the Project site. The BMPs proposed by the Project, including bioretention swales, two underground detention systems, and two modular wetlands units are highly effective at removing sediment from stormwater runoff flows. Therefore, stormwater runoff flows leaving the Project site would not carry substantial amounts of sediment. Once stormwater runoff leaves the Project site, it would be discharged into two existing storm drains located immediately southeast and southwest of the site. Because there are no exposed soils at the Project's discharge points, there is no potential for the Project's stormwater runoff to result in erosion as it leaves the Project site. Accordingly, the Project would not result in substantial erosion or siltation on- site or off-site, and a less-than-significant impact would occur.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐

Response: As described above under Response X(c(i)), proposed grading and earthwork activities on the Project site would alter the site's existing drainage patterns but would not substantially alter the drainage pattern of the local area. Under long-term development conditions, and with on-site detention, the peak storm water runoff flows discharged from the Project site would be equal to or less than under existing conditions (Thatcher, 2021, pp. 8-9). Accordingly, implementation of the Project would not substantially increase the rate or amount of surface water runoff discharged from the site in a manner that would result in flooding on- or off-site. Impacts would be less than significant.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐

Response: As discussed above under Response X(c(ii)), the amount of runoff discharged to the two existing storm drains adjacent south of the southern Project site boundary would be either reduced or equal to existing conditions. Furthermore, the Project's storm drain system would be sized and designed

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

in accordance with the area's master drainage plan to ensure that off-site flows that are conveyed through the Project site and flows originating off-site are discharged from the site at a volume and rate that can be accommodated by existing and planned downstream storm drain facilities (Thatcher, 2021, pp. 2-3, 8-9). Accordingly, the Project would not create or contribute runoff which would exceed the capacity of any existing or planned storm water drainage system, and impacts would be less than significant.

As discussed under Response X(a), the proposed Project would be required to comply with a future SWPPP and the Project's WQMP (*Technical Appendix I1*), which identify required BMPs to be incorporated into the Project to ensure that near-term construction activities and long-term post-development activities of the proposed Project would not result in substantial amounts of polluted runoff. Therefore, with mandatory compliance with the Project's SWPPP and WQMP, the proposed Project would not create or contribute substantial additional sources of polluted runoff, and impacts would be less than significant.

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

Response: According to FEMA Flood Insurance Rate Map (FIRM) No. 06065C0745G, the Project site is located within "Zone X (unshaded)", which are areas determined to be an area with a 0.2% chance of annual flood (FEMA, 2008). The Zone X (unshaded) designation is considered to be an area of minimal flood hazard and is not considered a special flood hazard area. Accordingly, the Project site is not expected to be inundated by flood flows during the lifetime of the Project and the Project would not impede flood flows. No impact would occur.

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

Response: The Pacific Ocean is located over 40 miles southwest of the Project site (Google Earth Pro, 2020); consequently, there is no potential for the Project site to be impacted by a tsunami as tsunamis typically only reach up to a few miles inland. The nearest large body of water to the Project site is Lake Perris, with the dam located approximately 5.3 miles southeast of the Project site. According to City of Moreno Valley General Plan FEIR Figure 5.5-2, *Floodplains, and High Fire Hazard Areas*, the Project site is not located in an identified inundation area (Moreno Valley, 2006b); therefore, risk of inundation by dam failure or seiche is low. Additionally, there are no levees in the vicinity of the Project site. Impacts would be less than significant.

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

Response: As discussed under Response X(a) above, the Project site is located within the Santa Ana River Basin and Project-related construction and operational activities would be required to comply with the Santa Ana RWQCB's *Santa Ana River Basin Water Quality Control Plan* by preparing and adhering to a SWPPP and WQMP. Implementation of the Project would not conflict with or obstruct the *Santa Ana River Basin Water Quality Control Plan* and impacts would be less than significant.

Additionally, as discussed under Response X(a) above, the Project would not substantially decrease groundwater supplies nor interfere substantially with groundwater recharge and, therefore, is not expected to conflict with or obstruct a sustainable groundwater management plan. Further, EMWD produces potable groundwater from the San Jacinto Groundwater Basin, which is an adjudicated basin (DWR, n.d.). Adjudicated basins are exempt from the 2014 Sustainable Groundwater Management Act (SGMA) requirement to develop Groundwater Sustainability Plan because such basins already operate under a court-ordered water management plan to ensure their long-term sustainability. No component of the Project would obstruct with or prevent implementation of the management plan for the San Jacinto Groundwater Basin. As such, the Project's construction and operation would not conflict with any sustainable groundwater management plan. Impacts would be less than significant.

Sources:

1. Thatcher, 2020, Project Specific Water Quality Management Plan, *Technical Appendix I1*
2. Thatcher, 2021, Preliminary Drainage Study, *Technical Appendix I2*.

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

3. Federal Emergency Management Agency (FEMA) – Flood Map Service Center: Flood Insurance Rate Map No. 06065C0745G https://msc.fema.gov/portal/home
4. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.5 – Hazards and Hazardous Materials
     - Figure 5.5-2 – Floodplains and High Fire Hazard Areas
   - Section 5.7 – Hydrology and Water Quality
5. Google Earth Pro
6. Eastern Municipal Water District, 2015 Urban Water Management Plan, https://www.emwd.org/sites/main/files/file-attachments/urbanwatermanagementplan_0.pdf?1537303453
7. Department of Water Resources, Adjudicated Basins Annual Reporting, https://sgma.water.ca.gov/webgis/index.jsp?appid=adjbasin

XI. LAND USE AND PLANNING – Would the project:

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

Response: Development of the Project would not physically disrupt or divide the arrangement of an established community. Under existing conditions, the Project site is bordered by Alessandro Boulevard to the north and bordered by vacant, undeveloped land to the east and west. The properties to the immediate south and southwest of the Project site are developed with warehouses; therefore, the Project would serve as an extension of the existing development patterns in the area. 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: The Project includes an amendment to the City of Moreno Valley General Plan Land Use Map that would change the Project site's land use designation from "Commercial" to "Business Park/Light Industrial." Approval of the requested General Plan Amendment would eliminate any potential inconsistency between proposed land use and the site's existing land use designation. Impacts to the environment associated with the Project's proposed General Plan Amendment are evaluated throughout this IS/MND, and where significant impacts are identified, mitigation measures are imposed to reduce impacts to less than significant levels. There are no environmental impacts that would result as a specific consequence of the proposed changes to the site's General Plan land use designation, beyond what is already evaluated and disclosed by this IS/MND.

The Project would not conflict with any applicable goals, objectives, and policies of the SCAQMD's *AQMP*, SCAG's Regional Transportation Plan/Sustainable Communities Strategy *(RTP/SCS)* (including the tentatively approved *Connect SoCal 2020-2045 RTP/SCS*), and SCAG's *Regional Comprehensive Plan*. Impacts would be less than significant.

Sources:

1. Moreno Valley Zoning Map, http://www.moreno-valley.ca.us/cdd/pdfs/ZoningMap.pdf
2. Moreno Valley Adopted Land Use Map, http://www.moreno-valley.ca.us/city_hall/general-plan/landuse-map.pdf
3. Google Earth Pro

XII. MINERAL RESOURCES – Would the project:

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

Response: The Project site is not located within an area known to be underlain by regionally- or locally-important mineral resources (Moreno Valley, 2006b, p. 5.14-2). Implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State of California. In addition, the City's General Plan EIR does not identify any locally-important mineral resource recovery sites on-site or within proximity to the Project site (Moreno Valley, 2006b, p. 5.14-2). Accordingly, no impact would occur.

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: Refer to Response XII(a), above. Implementation of the proposed Project would not result in the loss of a locally-important mineral resource recovery site. No impact would occur.

Sources:

1. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.14 – Mineral Resources

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: A *Noise Impact Analysis* (Urban Crossroads, 2020e) was prepared for the Project by Urban Crossroads to evaluate Project-related long-term operational and short-term construction noise impacts. This report is included as *Technical Appendix J* to this IS/MND and its findings are incorporated into the analysis presented herein.

The analysis presented below summarizes the Project's potential construction noise levels and operational noise levels. The detailed noise calculations for the analysis presented here are provided in Appendices 7.1, 9.1, and 10.1 of *Technical Appendix J*.

Construction Noise Impact Analysis

Construction activities on the Project site would create temporary periods of noise when heavy construction equipment is in operation and would cause a short-term increase in ambient noise levels. Maximum daytime construction noise levels at representative sensitive receptor locations near the Project site are summarized in Table 8, *Daytime Construction Equipment Noise Level Summary*.

Table 8: Daytime Construction Equipment Noise Level Summary

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	61.0	61.9	60.0	56.5	53.6	61.9
R2	55.4	56.3	54.4	50.9	48.0	56.3
R3	57.0	57.9	56.0	52.5	49.6	57.9
R4	56.4	57.3	55.4	52.3	49.0	57.3
R5	59.0	59.9	58.0	54.7	51.6	59.9
at 200'	62.8	63.7	61.8	57.6	55.4	63.7

[1]Noise receiver locations are shown on Exhibit 10-A of *Technical Appendix J*.
[2]Construction noise level calculations based on distance from the project site boundaries (construction activity area) to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 10.1 of *Technical Appendix J*.
Source: (Urban Crossroads, 2020e, Table 10-2)

As shown on Table 8, the Project's daytime construction noise levels are expected to range from 48.0 to 61.9 A-weighted decibels (dBA) equivalent sound level (L_{eq}) at the nearby receiver locations and range from 55.4 to 63.7 dBA L_{eq} at 200 feet from the Project site. Project construction noise levels are considered exempt from the noise limits specified in the City of Moreno Valley's Municipal Code if

activities occur within the hours of 7:00 a.m. to 8:00 p.m. (Municipal Code Section 11.80.030(D)(7)). Because Project-related construction activities are expected to occur during daylight hours, Project construction would not exceed the standards established by the City of Moreno Valley Municipal Code and impacts would be less than significant.

Notwithstanding, there is the potential that specific Project construction activities could occur outside of the construction hours permitted by right in the Municipal Code. Pursuant to Municipal Code Section 11.80.030(D)(7), the City of Moreno Valley would be required to approve any nighttime construction activities. If nighttime construction activities were to occur, noise levels above 60 dBA L_{eq} during the nighttime hours would exceed the standards established in the City's Municipal Code Section 11.80.030(C). The only Project construction activities that have a reasonable potential to occur during nighttime hours are concrete pouring. As shown in Table 9, nighttime concrete pouring activities would not exceed 56.5 dBA L_{eq} at the nearby sensitive receiver locations or 57.6 dBA L_{eq} at a distance of 200 feet from the Project site; neither noise level would exceed the standard established by the City of Moreno Valley Municipal Code. Impacts during potential nighttime concrete pouring activities would be less than significant.

Table 9: Nighttime Construction Equipment Noise Level Summary

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})		
	Paving Construction[2]	Nighttime Construction Standard[3]	Threshold Exceeded?[4]
R1	56.5	60	No
R2	50.9	60	No
R3	52.5	60	No
R4	52.3	60	No
R5	54.7	60	No
at 200'	57.6	60	No

[1]Noise receiver locations are shown on Exhibit 10-A of *Technical Appendix J*.
[2]Construction noise level calculations based on distance from the project site boundaries (construction activity area) to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 10.1 of *Technical Appendix J*.
[3]Per Moreno Valley Municipal Code Section 11.80.030(C).
[4]Is the applicable standard exceeded?
Source: (Urban Crossroads, 2020e, Table 10-4)

Operational Noise Impact Analysis

Stationary (on-site) noise sources associated with long-term Project operation are expected to include idling trucks, delivery truck and automobile parking, delivery truck backup alarms, roof-mounted equipment (e.g., heating/ventilation equipment), as well as noise associated with the loading and unloading of dry goods. The daytime and nighttime stationary maximum noise levels associated with Project operation at nearby sensitive receptor locations (the same receptor locations used for the construction analysis, above) and at a distance of 200 feet from the Project site are summarized in Table 10, *Operational Noise Level Compliance*.

As shown in Table 10, Project operations would not expose any nearby receptor to noise levels during daytime or nighttime hours in excess of City standards. The Project's operational noise would contribute a maximum of 0.6 dBA L_{eq} and 0.8 dBA L_{eq} to the existing daytime and nighttime ambient noise environment, respectively in the Project area (Urban Crossroads, 2020e, pp. 48-49). Accordingly, implementation of the Project would not result in the exposure of receivers near the Project site to stationary noise levels that exceed the standards established in the City of Moreno Valley Municipal Code. Impacts would be less than significant.

Table 10: Operational Noise Level Compliance

Receiver Location[1]	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]		Noise Level Standards Exceeded?[4]	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	39.5	38.0	65	60	No	No
R2	43.6	43.4	65	60	No	No
R3	48.9	48.8	65	60	No	No
R4	35.1	32.8	65	60	No	No
R5	38.8	36.7	65	60	No	No
at 200'	55.6	55.4	65	60	No	No

[1]See Exhibit 8-A of *Technical Appendix J* for the receiver locations.
[2]Proposed Project operational noise levels as shown on Tables 9-3 and 9-4 of *Technical Appendix J*.
[3]Exterior noise level standards for source (commercial) land use, as shown on Table 4-1 of *Technical Appendix J*.
[4]Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 8:00 a.m. - 10:00 p.m.; "Nighttime" = 10:01 p.m. - 7:59 a.m.
Source: (Urban Crossroads, 2020e, Table 9-5)

Operational Noise Impact Analysis – Traffic Noise

To evaluate permanent, off-site noise increases that could result from Project-related traffic, noise levels were modeled for the following traffic scenarios:

- Existing: This scenario refers to the existing traffic noise conditions without and with the proposed Project.
- Existing plus Ambient Growth plus Project (EAP): This scenario refers to the existing traffic noise conditions plus ambient growth without and with the proposed Project.

Traffic noise contours and noise levels were established based on existing and projected future traffic conditions on off-site roadway segments within the Project's study area, and do not take into account the effect of any existing noise barriers or topography that may affect ambient noise levels. Refer to *Technical Appendix J* for a detailed description of the methodology used to evaluate the Project's traffic-related noise effects.

Table 11, *Existing plus Project Traffic Noise Impacts*, presents a comparison of the existing noise conditions along Project study area roadway segments and the noise levels that would result with addition of Project-related traffic. Under Existing plus Project conditions, noise levels along roadway segments within the Project study area would increase between 0.0 and 2.0 dBA CNEL, which would not exceed the applicable significance thresholds. Therefore, the Project's contribution to off-site traffic noise would not result in a substantial permanent increase in ambient noise levels and Project-related impacts would be less than significant.

Table 12, *Existing plus Ambient Growth plus Project Traffic Noise Impacts*, presents a comparison of the existing noise conditions along Project study area roadway segments and the noise levels that would result with addition of ambient growth and Project-related traffic. Under Existing plus Ambient Growth plus Project, noise levels along roadway segments within the Project study area would increase between 0.0 and 1.9 dBA CNEL, which would not exceed the applicable significance thresholds. Therefore, the Project's contribution to off-site traffic noise would not result in a substantial permanent increase in ambient noise levels and Project-related impacts would be less than significant.

Table 11: Existing plus Project Traffic Noise Impacts

ID	Road	Segment	Receiving Existing Land Use[1]	CNEL at Receiving Land Use (dBA)[2]			Incremental Noise Level Increase Threshold[3]	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Graham St.	s/o Alessandro Bl.	Non-Sensitive	66.9	68.9	2.0	n/a	No
2	Alessandro Bl.	w/o Frederick St.	Sensitive	72.7	72.7	0.0	1.5	No
3	Alessandro Bl.	w/o Graham St.	Sensitive	72.8	73.3	0.6	1.5	No
4	Alessandro Bl.	e/o Graham St.	Non-Sensitive	73.1	73.1	0.0	3.0	No

[1]Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.
[2]The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[3]Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4-1 of *Technical Appendix J*)?
Source: (Urban Crossroads, 2020e, Table 7-5)

Table 12: Existing plus Ambient Growth plus Project Traffic Noise Impacts

ID	Road	Segment	Receiving Existing Land Use[1]	CNEL at Receiving Land Use (dBA)[2]			Incremental Noise Level Increase Threshold[3]	
				No Project	With Project	Project Addition	Limit	Exceeded?
1	Graham St.	s/o Alessandro Bl.	Non-Sensitive	67.1	69.0	1.9	n/a	No
2	Alessandro Bl.	w/o Frederick St.	Sensitive	72.9	72.9	0.0	1.5	No
3	Alessandro Bl.	w/o Graham St.	Sensitive	72.9	73.5	0.5	1.5	No
4	Alessandro Bl.	e/o Graham St.	Non-Sensitive	73.2	73.2	0.0	3.0	No

[1]Based on a review of existing aerial imagery. Noise sensitive uses limited to existing residential land uses.
[2]The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use.
[3]Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4-1 of *Technical Appendix J*)?
Source: (Urban Crossroads, 2020e, Table 7-6)

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

Response: The analysis presented below demonstrates that implementation of the Project would not generate excessive groundborne vibration or groundborne noise levels.

Construction Analysis
Construction activities on the Project site would utilize construction equipment that has the potential to generate vibration. Table 13, *Construction Equipment Vibration Levels*, below, summarizes Project construction vibration levels at receiver locations near the Project site. As shown in Table 12, all receiver locations in the vicinity of the Project site would be exposed to vibration levels that fall below the City of Moreno Valley's significance threshold (i.e., 78 vibration decibels (VdB) for daytime residential uses, 84 VdB for daytime office use at all receiver locations and at 200 feet from the property line of the source). Accordingly, Project construction would not generate temporary, excessive groundborne vibration or noise levels and a less than significant impact would occur.

Operational Analysis
Under long-term conditions, the proposed Project would not include nor require equipment, facilities, or activities that would result in substantial or perceptible groundborne vibration. Trucks would travel to-and-from the Project site during long-term operation; however, vibration levels for heavy trucks operating

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

Table 13: Construction Equipment Vibration Levels

Receiver Location[1]	Distance to Construction Activity (Feet)	Receiver Vibration Levels (VdB)[2]					Threshold VdB[3]	Threshold Exceeded?[4]
		Small Bulldozer	Jack-hammer	Loaded Trucks	Large Bulldozer	Highest Vibration Levels		
R1	152'	34.5	55.5	62.5	63.5	63.5	78	No
R2	1,023'	9.6	30.6	37.6	38.6	38.6	78	No
R3	744'	13.8	34.8	41.8	42.8	42.8	84	No
R4	784'	13.1	34.1	41.1	42.1	42.1	78	No
R5	217'	29.8	50.8	57.8	58.8	58.8	78	No
at 200'	200'	30.9	51.9	58.9	59.9	59.9	78	No

[1]Noise receiver locations are shown on Exhibit 10-A of *Technical Appendix J*.
[2]Based on the Vibration Source Levels of Construction Equipment included on Table 10-5 of *Technical Appendix J*.
[3]FTA Transit Noise and Vibration Impact Assessment maximum acceptable vibration criteria as shown in Section 3.5 of *Technical Appendix J*.
[4]Does the vibration level exceed the maximum acceptable vibration threshold?
Source: (Urban Crossroads, 2020e, Table 10-6)

at low-to-normal speeds on smooth, paved surfaces – as is expected on the Project site and along surrounding roadways – typically do not exceed 65 VdB. Truck deliveries transiting on-site would travel at very low speeds, so it is expected long-term operations at the Project site would not exceed the City's allowable levels. Accordingly, long-term operation of the Project would not expose persons to or generate excessive groundborne vibration or groundborne noise levels, and a less-than-significant impact would occur.

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

Response: The Project site is located approximately 1.0-mile northeast of the March Air Reserve Base/Inland Port Airport (MARB/IPA). Based on the Airport Land Use Compatibility Plan (ALUCP) for the MARB/IPA, the Project is located outside of the Airport's 60 dBA CNEL noise level contours (RCALUC, 2014, Map MA-4), and therefore, represents a moderate to low risk with regard to airport noise. Additionally, the proposed use for the site would not conflict with the allowable uses described in the ALUCP (RCALUC, 2014, Table MA-2). Accordingly, the proposed Project would not expose people residing or working the Project area to excessive noise levels from a public airport; therefore, impacts would be less than significant.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.4 – Noise
     - Figure 6-2 – Buildout Noise Contours
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.4 – Noise
     - Figure 5.4-1 – March Air Reserve Base Noise Impact Area
3. Moreno Valley Municipal Code Chapter 11.80 Noise Regulations
4. March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, adopted November 13, 2014
5. Urban Crossroads, 2020e, Compass Danbe Centerpointe Noise Impact Analysis, *Technical Appendix J*

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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: The proposed Project would result in development of the subject property with industrial land uses that would add employment opportunities to the area. It is anticipated that the employment base for both the construction and operational phases of the Project would come from the existing population in the Inland Empire, which comprises western Riverside County and southwestern San Bernardino County. According to the Bureau of Labor Statistics, the Riverside-San Bernardino-Ontario region's civilian labor force contains approximately 2,032,794 persons with approximately 1,809,690 people employed and an unemployment rate of approximately 11.0% (approximately 223,607 persons) (USBLS, 2020). Accordingly, the Project region already contains an ample supply of potential employees under existing conditions and the Project's labor demand is not expected to draw substantial numbers of new residents to the area. Furthermore, approximately 86% of City of Moreno Valley residents commute outside of the City for work (SCAG, 2019, p. 21); therefore, the Project would provide job opportunities closer to home for existing and future Moreno Valley residents.

There are no components of the Project that would reasonably result in indirect or unplanned population growth because the surrounding area is mostly developed under existing conditions or approved for development. The Project would install new/expanded infrastructure; however, this infrastructure would either be master-planned facilities (meaning the facilities would be installed with or without the Project) or would be private facilities for the sole use of the Project (meaning they would not be available for general public use). Accordingly, no significant indirect impacts associated with population growth would result from any Project-related improvements because the Project and its required improvements would not induce substantial growth on surrounding properties.

Based on the foregoing analysis, neither the Project nor any Project-related component would result in substantial, direct, or indirect population growth that would cause a significant direct or indirect impact to the environment. This impact is less than significant.

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

Response: The Project site does not contain any residential structures and no people live on the site under existing conditions. Accordingly, implementation of the Project would not displace substantial numbers of existing housing or people and would not necessitate the construction of replacement housing elsewhere. No impact would occur.

Sources:

1. Google Earth Pro
2. Southern California Association of Governments (SCAG) – Profile of the City of Moreno Valley, https://www.scag.ca.gov/Documents/MorenoValley.pdf
3. United States Bureau of Labor Statistics – Riverside-San Bernardino-Ontario, CA Economy at a Glance on August 2020, https://data.bls.gov/timeseries/LAUMT064014000000006?amp%253bdata_tool=XGtable&output_view=data&include_graphs=true

XV. PUBLIC SERVICES – Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐

Response: Fire protection services to the Project site are provided by the Moreno Valley Fire Department (MVFD). The Project site is served by the Kennedy Park Fire Station (Station No. 65) located

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

at 15111 Indian Avenue, approximately 2.0 roadway miles to the southeast of the Project site, and the Towngate Fire Station (Station No. 6) located at 22250 Eucalyptus Avenue, approximately 2.5 roadway miles to the northwest of the Project site. Based on the Project site's proximity to the two existing fire stations, the Project would be adequately served by fire protection services, and no new or expanded unplanned facilities would be required. The Project Applicant is required to comply with the provisions of the City of Moreno Valley's Development Impact Fee (DIF) Ordinance (Ordinance No. 695), which requires a fee payment that the City applies to the funding of public facilities, including fire protection facilities. Mandatory compliance with the DIF Ordinance would be required prior to the issuance of a building permit.

The Project would feature a minimum of fire safety and fire suppression activities, including type of building construction, fire sprinklers, a fire hydrant system, and paved access. The proposed buildings would be of concrete tilt-up construction that contain a low fire hazard risk rating. In addition, a fire alarm system is proposed to be installed, as well as ceiling-mounted sprinklers that are designed to suppress a fire. To suppress a fire does not necessarily mean it will extinguish the fire but rather it is meant to "knock" the fire back down to its source, making it more manageable for the MVFD to extinguish.

Based on the foregoing, the proposed Project would receive adequate fire protection service and would not result in the need for new or physically altered fire protection facilities. Impacts to fire protection facilities would be less than significant.

ii) Police protection?	☐	☐	☒	☐

Response: The Project would introduce two new building structures and employees to the Project site, which would result in an incremental increase in demand for police protection services, but is not anticipated to require or result in the construction of new or physically altered police facilities. Furthermore, the Project Applicant would be required to comply with the provisions of Moreno Valley's Development Impact Fee (DIF) Ordinance (Ordinance No. 695), which requires a fee payment that the City applies to the funding of public facilities, including police protection facilities. Mandatory compliance with the DIF Ordinance would be required prior to the issuance of a building permit. Based on the foregoing, the proposed Project would receive adequate police protection service, and would not result in the need for new or physically altered fire protection facilities. Impacts to police protection facilities would therefore be less than significant.

iii) Schools?	☐	☐	☒	☐

Response: Implementation of the Project would not create a direct demand for public school services, as the subject property would contain non-residential uses and would not generate any school-aged children requiring public education. The addition of employment-generating uses on the Project site would assist the City in achieving its goal to provide a better jobs/housing balance within the City and the larger western Riverside County region (Moreno Valley, 2006b, pp. 5.12-1). The proposed Project is not expected to draw a substantial number of new residents to the region and would therefore not indirectly generate school-aged students requiring public education. Because the proposed Project would not directly generate students and is not expected to indirectly draw students to the area, the proposed Project would not cause or contribute to a need to construct new or physically altered public school facilities. Although the Project would not create a demand for additional public school services, the Project Applicant would be required to contribute development impact fees to the Moreno Valley Unified School District in compliance with California Senate Bill 50 (Greene), which allows school districts to collect fees from new developments to offset the costs associated with increasing school capacity needs. Mandatory payment of school fees would be required prior to the issuance of building permits. Impacts to public schools would be less than significant.

iv) Parks?	☐	☐	☐	☒

Response: As discussed under Responses XVI(a) and XV(b) below, the Project would not create a demand for public park facilities and would not result in the need to modify existing or construct new park facilities. Accordingly, implementation of the Project would not adversely affect any park facility. Thus, no impact would occur.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
v) Other public facilities?	☐	☐	☐	☒

Response: The Project is not expected to result in a demand for other public facilities/services, including libraries, community recreation centers, post offices, and/or animal shelters. As such, implementation of the Project would not adversely affect other public facilities or require the construction of new or modified public facilities and no impact would occur.

Sources:

1. Final Environmental Impact Report City of Moreno Valley General Plan
   - City of Moreno Valley Land Use Map
     - Figure 5.4-1 – March Air Reserve Base Noise Impact Area
2. Moreno Valley Fire Department – Strategic Plan 2012-2022
3. California Legislative Information – Senate Bill 50 (Greene), Approved August 27, 1998, http://www.leginfo.ca.gov/pub/97-98/bill/sen/sb_0001-0050/sb_50_bill_19980827_chaptered.html
4. Google Earth Pro
5. City of Moreno Valley Municipal Code
   - Chapter 3.42 "Commercial and Industrial Development Impact Fees" – Ordinance 695

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: The Project would develop the subject property with industrial land uses. The Project does not propose any type of residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, thus, 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: The Project does not propose to construct any new on- or off-site recreation facilities. Additionally, the Project would not expand any existing off-site recreational facilities. Therefore, environmental effects related to the construction or expansion of recreational facilities would not occur.

Sources:

1. Project Application Materials – Site Plan

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: The Project would not conflict with applicable objectives from the Moreno Valley General Plan Circulation Element, including Objective 5.1, 5.2, 5.3 (discussed in more detail below), 5.4, 5.5, 5.8, 5.9, 5.10, and 5.11. In addition, Project would not conflict with the City's Bicycle Master Plan nor with the vehicular and non-vehicular goals from SCAG's *2016-2040 RTP/SCS*, including goals to: 1) maximize mobility and accessibility for all people and goods in the region; 2) ensure travel safety and reliability for all people and goods in the region; 3) preserve and ensure a sustainable regional transportation system; 4) protect the environment and health of residents by improving air quality and encouraging active transportation; and 5) encouraging land use and growth patterns that facilitate transit and active transportation.

In accordance with Senate Bill (SB) 743, the California Natural Resources Agency (CNRA) adopted changes to the CEQA Guidelines in December 2018, which identify that starting on July 1, 2020, vehicle miles traveled (VMT) is the appropriate metric to evaluate a project's transportation impacts. As of December 2018, when the revised CEQA Guidelines were adopted, automobile delay, as measured by "level of service" (LOS) and other similar metrics, no longer constitutes a significant environmental effect under CEQA. Lead agencies in California are required to use VMT to evaluate project-related transportation impacts. The VMT analysis for the Project is provided in Response XVII(b) below.

Notwithstanding, the City of Moreno Valley traffic study guidelines requires a traffic analysis based on LOS, which the City uses in part to demonstrate compliance with General Plan Circulation Element Objective 5.3, which states that the City shall maintain LOS C on roadway links wherever possible and LOS D in the vicinity of SR-60 and employment centers, and to determine transportation improvement obligations of development projects. For this reason, although LOS cannot be used to make a conclusion of a significant environmental effect, the Project's impact to transportation facilities based on LOS is provided herein for informational purposes. The LOS analysis provided on the following pages is based on a traffic impact analysis report prepared by the consulting form Urban Crossroads and included as *Technical Appendix K1* to this IS/MND (Urban Crossroads, 2021a). The traffic impact analysis was prepared in conformance with the City of Moreno Valley's *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment* (June 2020).

Project Study Area

The Project's traffic study area (hereafter "Project study area" or "study area") was devised based on the City of Moreno Valley traffic impact analysis guidelines and consultation with City of Moreno Valley staff via the City's standard scoping process. The study area includes the intersections listed in Table 14, *Intersection Analysis Locations*.

Table 14: Intersection Analysis Locations

ID	Intersection Location	Jurisdiction	CMP?
1	Frederick St. & Alessandro Bl.	City of Moreno Valley	No
2	Driveway 1 & Alessandro Bl. – Future Intersection	City of Moreno Valley	No
3	Driveway 2 & Alessandro Bl. – Future Intersection	City of Moreno Valley	No
4	Driveway 3 & Alessandro Bl. – Future Intersection	City of Moreno Valley	No
5	Graham St. & Alessandro Bl.	City of Moreno Valley	No

Source: (Urban Crossroads, 2021a, Table 1-1)

Due to the ongoing COVID-19 pandemic, historic traffic counts from 2018 were used in conjunction with a 4.04 percent growth factor to reflect expected "normal" 2020 traffic conditions (Urban Crossroads, 2021a, p. 22). Based on the collected data, all existing intersections in the Project study area operate at a level of service (LOS) of "C" or better during the AM and PM peak hours (7:00-9:00am and 4:00-6:00pm, respectively) (Urban Crossroads, 2021a, p. 22). Refer to *Technical Appendix K1* for more information about existing traffic conditions in the Project study area.

Thresholds of Significance

The Project would result in a conflict with General Plan Circulation Element Objective 5.3 if, under Opening Year traffic conditions, Project traffic would:

- Cause a signalized intersection to degrade from either LOS C or better or LOS D or better to LOS D/E/F or LOS E/F, respectively; or increase the delay by 5.0 or more seconds at a signalized intersection that operates at an unacceptable level of service (i.e., LOS D or LOS E/F) without the Project (Urban Crossroads, 2021a, p. 14).
- Cause an unsignalized intersection to degrade from either LOS C or better or LOS D or better to LOS D/E/F or LOS E/F, respectively; or increase the delay by 5.0 or more seconds at an unsignalized intersection that operates at an unacceptable level of service (i.e., LOS D or LOS E/F) without the Project and the intersection meets the peak hour traffic signal warrant after the addition of Project traffic (Urban Crossroads, 2021a, p. 14).

Project Trip Generation and Distribution

Trip generation represents the amount of traffic that is attracted to and produced by a development project. Buildings 1 and 2 are evaluated as 70 percent warehouse use and 30 percent high-cube cold storage warehouse use each. The Institute of Transportation Engineers (ITE) Trip Generation Manual (2017) includes a trip generation rate for warehouse uses (ITE land use code 150) and high-cube cold storage warehouse uses (ITE land use code 157). The assumptions for the mix of trucks, by axle type, relies on recommendations from the SCAQMD Warehouse Truck Trip Study Data Results and Usage (2014). Based on the guidance from the SCAQMD, the following truck fleet mix under ITE land use code 150 was utilized for the purposes of estimating the truck trip generation for Buildings 1 and 2: 16.7% of the total trucks as 2-axle trucks, 20.7% of the total trucks as 3-axle trucks, and 62.6% of the total trucks as 4+-axle trucks (Urban Crossroads, 2021a, p. 29). The following truck fleet mix under ITE land use code 157 was utilized for the purposes of estimating the truck trip generation for Buildings 1 and 2: 34.7% of the total trucks as 2-axle trucks, 11.0% of the total trucks as 3-axle trucks, and 54.3% of the total trucks as 4+-axle trucks (Urban Crossroads, 2021a, p. 29).

Based on the assumptions described above, the Project is calculated to generate approximately 742 total vehicle trips per day, including 59 vehicle trips during the AM peak hour (7:00-9:00am) and 64 vehicle trips during the PM peak hour (4:00-6:00pm) (Urban Crossroads, 2021a, p. 31). Of the Project's 742 daily vehicle trips, 224 would be from trucks with two or more axles (ibid.). In conformance with standard traffic engineering practices in Southern California, the Project's daily vehicle trips were converted to a passenger car equivalent (PCE). PCE factors allow the typical "real-world" mix of vehicle types to be represented as a single, standardized unit (i.e., the passenger car). A PCE factor of 1.5 was applied to two-axle truck trips, a factor of 2.0 was applied to three-axle truck trips, and a factor of 3.0 was applied to four plus-axle truck trips (Urban Crossroads, 2021a, pp. 31, 33). The Project is anticipated to generate approximately 1,062 daily PCE trips, including 21 PCE trips during the AM peak hour and 81 PCE trips during the PM peak hour (ibid.). The Project's PCE vehicle trips were used for purposes of the LOS analysis. For more information about the Project's trip generation, refer to *Technical Appendix K1*.

Trip distribution is the process of identifying the probable destinations, directions, or traffic routes that would be utilized by Project traffic. The potential interaction between the planned land uses and surrounding regional access routes are considered to identify the routes where Project traffic would distribute. The trip distribution for the Project was developed based on anticipated passenger car and truck travel patterns to-and-from the Project site. The total volume on each roadway was divided by the Project's total traffic generation to indicate the percentage of Project traffic that would use each component of the roadway system in each relevant direction.

The assignment of traffic from the Project area to the adjoining roadway system is based on the Project trip generation, trip distribution, and the arterial highway and local street system improvements that would be in place by the time of initial occupancy of the Project. Based on the identified Project traffic generation and trip distribution patterns, PCE factored Project average daily traffic (ADT) volumes for the weekday are shown on Exhibit 4-3 in *Technical Appendix K1*.

Analysis Scenarios

The Project contribution of traffic to the local circulation network were assessed for each of the following conditions:

- Near-term Construction; and
- Opening Year (2022)

The Near-Term Construction conditions analysis determines the potential for the Project's construction-related traffic to result in an adverse effect to the local roadway system. Types of traffic anticipated during construction include construction workers traveling to/from the Project site as well as deliveries of construction materials to the Project site.

The Opening Year (2022) analysis includes an evaluation of traffic conditions at the Project's "opening year." The Opening Year (2022) analysis considers existing traffic + ambient growth + Project traffic.

Near-term Construction Traffic Conditions

During the Project's construction phase, traffic to-and-from the subject property would be generated by construction employee trips, delivery of construction materials, and delivery/use of heavy equipment.

Vehicular traffic from construction employees would be substantially less than daily and peak hour traffic volumes generated during Project operational activities because construction activities typically begin/end outside of the peak hour; therefore, a most – if not all – construction employees would not be driving to/from the Project site during hours of peak congestion. Because Project operations would not conflict with the LOS standards from Circulation Element Objective 5.3 under Opening Year (2022) traffic conditions (see "Opening Year (2022) Traffic Conditions," below) and because construction worker peak hour trips would be substantially less than the peak hour trips generated by Project operations, traffic from construction workers is not expected to conflict with the LOS performance standards of Circulation Element Objective 5.3.

Deliveries of construction materials to the Project site also would make nominal traffic contributions to the local roadway network because most trips would occur during non-peak hours and the total volume of trips would be less than the Project's operational trips, which are shown below to not conflict with Circulation Element Objective 5.3. Furthermore, construction materials would be delivered to the site throughout the construction phase based on need and would not occur on an everyday basis. Heavy equipment would be utilized on the Project site during the construction phase. As most heavy equipment is not authorized to be driven on public roadways, most equipment would be delivered and removed from the site via flatbed trucks. As with the delivery of construction materials, the delivery of heavy equipment to the Project site would not occur on a daily basis, but would occur periodically throughout the construction phase based on need.

Based on the foregoing analysis, traffic generated by the Project's construction phase would not result in a conflict with the LOS performance standards contained in Circulation Element Objective 5.3.

Opening Year (2022) Traffic Conditions

As shown in Table 15, all Project study area intersections would operate at acceptable LOS under Opening Year (2022) traffic conditions. Therefore, the Project would not cause or contribute to an exceedance of the LOS performance standards contained in Circulation Element Objective 5.3.

Table 15: Intersection Analysis for Opening Year (2022) Traffic Conditions

#	Intersection	Traffic Control[2]	Existing (2020) Delay[1] (secs.) AM	Existing (2020) Delay[1] (secs.) PM	Existing (2020) Level of Service AM	Existing (2020) Level of Service PM	EAP (2022) Delay[1] (secs.) AM	EAP (2022) Delay[1] (secs.) PM	EAP (2022) Level of Service AM	EAP (2022) Level of Service PM
1	Frederick St. & Alessandro Bl.	TS	22.4	30.7	C	C	23.4	33.8	C	C
2	Driveway 1 & Alessandro Bl.	**CSS**	Future Intersection				11.8	21.0	B	C
3	Driveway 2 & Alessandro Bl.	**CSS**	Future Intersection				11.8	22.3	B	C
4	Driveway 3 & Alessandro Bl.	**CSS**	Future Intersection				11.7	21.8	B	C
5	Graham St. & Alessandro Bl.	TS	20.4	32.6	C	C	22.0	34.0	C	C

[1]Per the Highway Capacity Manual (6th Edition), overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.
[2]CSS = Cross-street Stop; TS = Traffic Signal; **CSS** = Improvement
Source: (Urban Crossroads, 2021a, Table 5-1)

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

Response: As previously discussed, SB 743, which approved in 2013, was intended to change the way transportation impacts are determined according to CEQA. Updates to the CEQA Guidelines that were adopted in December 2018 included the addition of CEQA Guidelines Section 15064.3, of which

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

Subdivision "b" establishes criteria for evaluating a project's transportation impacts based on project type and using automobile VMT as the metric. As a component of OPR's revisions to the CEQA Guidelines, lead agencies were required to adopt VMT thresholds of significance by July 1, 2020. The City of Moreno Valley adopted its *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment* in June 2020, which is used in this analysis to determine the significance of Project-related VMT.

According to the VMT analysis prepared by Urban Crossroads (*Technical Appendix K2*), the Project's VMT per employee would exceed the City's VMT per employee threshold by approximately 11.7% under baseline (Year 2020) traffic conditions when the Project's location and Project design features are not considered (Urban Crossroads, 2021b, p. 5). With consideration of the Project's location and Project design features, including: 1) the Project's geographic location as an employment use in proximity to existing residential and commercial service land uses – which would reduce Project-related employee VMT from employee commutes, errands during break periods, etc.; and 2) sidewalks along the Project site frontage with Alessandro Boulevard which would facilitate pedestrian and bicycle travel to the site, the Project-related VMT would be reduced by approximately 15% and would fall below the City's significance threshold (Urban Crossroads, 2021b, p. 8). Therefore, based on the City's VMT significance guidelines, the Project would have a less-than-significant direct VMT impact and, therefore, would not conflict with or be inconsistent with CEQA Guidelines section 15064.3(b).

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

Response: The types of traffic generated during operation of the Project (i.e., passenger cars and trucks) would be compatible with the type of traffic observed along Project study area roadways under existing conditions. In addition, all proposed improvements within the public right-of-way would be installed in conformance with City of Moreno Valley design standards. The City reviewed the Project's application materials and determined that no hazardous transportation design features would be introduced through implementation of the Project. Accordingly, the Project's construction and operation would not create or substantially increase safety hazards due to a design feature or incompatible use. Implementation of the Project would result in a less-than-significant impact.

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

Response: The Project would result in the construction of two warehouse buildings on the Project site, which would require the need for emergency access to-and-from the site. During the course of the City of Moreno Valley's review of the proposed Project, the Project's design was reviewed to ensure that adequate access to-and-from the site is provided for emergency vehicles. The City of Moreno Valley also will require the Project to provide adequate paved access to-and-from the site as a condition of Project approval. The Project's proposed driveways would connect directly to Alessandro Boulevard, and the Project does not propose any changes to public roads other than frontage improvements along Alessandro Boulevard that would improve local circulation/access. Furthermore, the City of Moreno Valley will review all future Project construction drawings to ensure that adequate emergency access is maintained along abutting public streets during temporary construction activities. With required adherence to City requirements for emergency vehicle access, impacts would be less than significant.

Sources:

1. Urban Crossroads, 2021a, Traffic Analysis, *Technical Appendix K1*
2. Urban Crossroads, 2021b, Vehicle Miles Travelled Analysis, *Technical Appendix K2*
3. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006

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:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Response: A Phase I Cultural Resources Study (*Technical Appendix C*) was prepared for the Project site by BFSA. The Phase I Cultural Resources Study included a records search with the Eastern Information Center (EIC) at University of California Riverside in order to assess previous archaeological studies and identify any previously recorded tribal cultural resources within the Project site. Additionally, as part of preparation of the Phase I Cultural Recourses Study, BFSA also requested a records search of the Native American Heritage Commission (NAHC) Sacred Lands Files (SLF). According to BFSA's search of EIC records and NAHC SLFs, no tribal cultural resources listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources are present on the Project site or previously recorded on the Project site. In addition, the Project site is highly disturbed and no tribal cultural resources were observed on the Project site or in the Project site's immediate vicinity. (BFSA, 2020a, p. 1.0-1)

As part of the SB 18/AB 52 consultation process required by State law, the City of Moreno Valley sent notification of the Project to Native American tribes with possible traditional or cultural affiliation to the Project area. In response to the AB 52 consultation invitation, five tribes contacted the City to request formal consultation. The City met with each tribe and concluded tribal consultation on June 16, 2021. During the course of the tribal consultation process, no Native American tribe provided the City with substantial evidence indicating that tribal cultural resources, as defined in Public Resources Code section 21074, are present on the Project site or have been found previously on the Project site. Notwithstanding, due to the Project site's location in an area where multiple Native American tribes are known to have a cultural affiliation, there is the possibility that prehistoric archaeological resources, including tribal cultural resources, could be encountered during ground-disturbing construction activities – although this is considered unlikely due to the pervasive, historic and on-going disturbances that have occurred on the Project site. Were a tribal cultural resource, as defined in Public Resources Code Section 21074, to be found on the Project site during construction – and not protected – a significant impact would occur.

Implementation of MMs TCR-1 through TCR-6, would ensure the proper identification and subsequent treatment of any significant tribal cultural resources that may be encountered during ground-disturbing activities associated with Project development. With implementation of the required mitigation, the Project's potential impact to significant tribal cultural resources would be reduced to less-than-significant.

Mitigation

MM TCR-1 Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all mass grading and trenching activities. The Project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a Cultural Resources Management Plan (CRMP) in consultation pursuant to the definition in AB52 to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting tribe is defined as a tribe that initiated the AB 52 tribal consultation process

for the Project, has not opted out of the AB52 consultation process, and has completed AB 52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include:

a) Project grading and development scheduling;

b) The Project archeologist and the Consulting Tribes(s) as defined in MM TCR-1 shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The 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 and Consulting Tribe(s) shall make themselves available to provide the training on an as-needed basis;

c) The protocols and stipulations that the contractor, City, Consulting Tribe(s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation.

MM TCR-2 Prior to the issuance of a grading permit, the Developer shall secure agreements with the Pechanga Band of Luiseño Indians and Soboba Band of Luiseño Indians for tribal monitoring. The Developer is also required to provide a minimum of 30 days advance notice to the tribes of all mass grading and trenching activities. The Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological resources are unearthed. If the Native American Tribal Representatives suspect that an archaeological resource may have been unearthed, the Project Archaeologist or the Tribal Representatives shall immediately redirect grading operations in a 100-foot radius around the find to allow identification and evaluation of the suspected resource. In consultation with the Native American Tribal Representatives, the Project Archaeologist shall evaluate the suspected resource and make a determination of significance pursuant to California Public Resources Code Section 21083.2.

MM TCR-3 In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:

a) One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Moreno Valley Planning Division:

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 MM TCR-1. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed. No recordation of sacred items is permitted without the written consent of all Consulting Native American Tribal Governments as defined in MM TCR-1.

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

MM TCR-4 The City shall verify that the following note is included on the Grading Plan:

"If any suspected archaeological resources are discovered during ground-disturbing activities and the Project Archaeologist or Native American Tribal Representatives are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Tribal Representatives to the site to assess the significance of the find."

MM TCR-5 If potential historic or cultural resources are uncovered during excavation or construction activities at the project site, work in the affected area must cease immediately and a qualified person meeting the Secretary of the Interior's standards (36 CFR 61), Tribal Representatives, and all site monitors per the Mitigation Measures, shall be consulted by the City to evaluate the find, and as appropriate recommend alternative measures to avoid, minimize or mitigate negative effects on the historic, or prehistoric resource. Determinations and recommendations by the consultant shall be immediately submitted to the Planning Division for consideration, and implemented as deemed appropriate by the Community Development Director, in consultation with the State Historic Preservation Officer (SHPO) and any and all Consulting Native American Tribes as defined in MM TCR-1 before any further work commences in the affected area.

MM TCR-6 If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the "most likely descendant". The "most likely descendant" shall then make recommendations, and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98).

Sources:

1. Brian F. Smith and Associates, 2020a, Phase I Cultural Resources Survey for the Compass Danbe Centerpointe Project, *Technical Appendix C*

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: The Project would construct an on-site network of water and sewer pipes and stormwater facilities that would connect to existing water, sewer, and storm drain lines beneath Alessandro Boulevard and along the southern Project site boundary. The Project also would remove existing wooden power poles and underground existing overhead power lines (less than 115kV) along the south side of Alessandro Boulevard abutting the Project site and install connections to existing electricity, natural gas, and communications infrastructure that already exist in the area, and all such connections would be accomplished in conformance with the rules and standards enforced by the applicable service provider. The installation of water and sewer line connections, stormwater drainage facilities, electricity, natural gas, and communications infrastructure as proposed by the Project would result in physical impacts to the environment; however, these impacts are considered to be part of the Project's construction phase and are evaluated throughout this IS/MND accordingly. In instances where significant environmental impacts have been identified for the Project's construction phase, mitigation measures are recommended in each applicable subsection of this IS/MND to reduce impacts to less-than-significant levels. The construction of utility infrastructure necessary to serve the proposed Project would not result in any significant physical effects on the environment that are not already identified and disclosed as part of this IS/MND. Accordingly, additional mitigation measures beyond those identified throughout this IS/MND would not be required.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

Response: EMWD is responsible for supplying potable water to the Project site and its region. As discussed in the *2015 EMWD Urban Water Management Plan*, herein incorporated by reference as the "UWMP," which applies to and was adopted by the EMWD, adequate water supplies are projected to be available to meet EMWD's estimated water demand through 2040 under normal, historic single-dry and historic multiple-dry year conditions (EMWD, 2016a, p. XV). EMWD forecasts for projected water demand are based on the population projections of SCAG, which rely on the adopted land use designations contained within the general plans that cover the geographic area within EMWD's service. The water use projections utilized in the *2015 EMWD UWMP* were based on the site's existing "Commercial" land use designation on the City of Moreno Valley Land Use Map. The Project would change the site's land use designation to "Business Park/Light Industrial" and would operate the site as a light industrial land use (i.e., warehousing). According to EMWD's Water System Planning & Design manual, commercial and industrial development have the same average daily water demand rate (2,000 gpd per acre) (EMWD, 2007, p. 4). Because the Project's water demand would be identical to the projection for the site's existing land use designation (as mentioned above), the determination of the *2015 EMWD UWMP* remains valid and EMWD would have sufficient water supplies available to serve the Project from existing entitlements/resources and no new or expanded entitlements are needed. The Project's impact would be less than significant.

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

Response: Wastewater generated by the Project would be treated by the EMWD, which operates the Moreno Valley Regional Water Reclamation Facility. Based upon EMWD's wastewater generation rate of 1,700 gallons per day (gpd) per acre for industrial light land uses, the proposed Project would generate approximately 30,090 gallons of wastewater per day (1,700 gpd per acre × 17.7 Project acres = 30,090 gpd). Under existing conditions, the Moreno Valley Regional Water Reclamation Facility has an excess treatment capacity of approximately 5.4 million gallons per day (mgpd). Implementation of the Project would utilize approximately 0.6% of the Moreno Valley Regional Water Reclamation Facility daily excess treatment capacity (EMWD, 2016b). Accordingly, the Moreno Valley Regional Water Reclamation Facility has sufficient capacity to treat wastewater generated by the Project in addition to existing commitments. The Project would not create the need for any new or expanded wastewater facility (such as conveyance lines, treatment facilities, or lift stations). Because there is adequate capacity at existing treatment facilities to serve the Project's projected sewer demand, impacts would be less than significant.

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

Response: Implementation of the Project would generate an incremental increase in solid waste volumes requiring off-site disposal during short-term construction and long-term operational activities. Solid waste generated by the Project would be disposed at the El Sobrante Landfill and/or the Badlands Sanitary Landfill.

The El Sobrante Landfill is permitted to receive 16,054 tons of refuse per day and has a total capacity of 209,910,000 cubic yards. According the CalRecycle, the El Sobrante Landfill has a total remaining capacity of 143,977,170 cubic yards. The El Sobrante Landfill is estimated to reach capacity, at the earliest time, in the year 2051 (CalRecycle, 2019a). In July 2020 (the most recent period for which disposal volumes are available), the average daily disposal at the El Sobrante Landfill was approximately 11,003 tons, which correlates to an excess daily disposal capacity of approximately 5,051 tons (CalRecycle, 2020a).

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
The Badlands Sanitary landfill is permitted to accept a maximum of 4,800 tons of solid waste per day. In July 2020, the most recent time period for which disposal data was publicly available, the Badlands Sanitary Landfill was receiving an average of 2,709 tons of waste per day, which correlates to an excess daily disposal capacity of approximately 2,091 tons (CalRecycle, 2020b). The Badlands Sanitary Landfill has available capacity until at least the year 2021; however, future landfill expansion opportunities may exist at this site. (CalRecycle, 2019b) The analysis below summarizes the Project's potential to generate solid waste during construction and/or operation that would exceed the disposal capacity of local landfill facilities. As demonstrated in the analysis below, the Project would generate less-than-significant volumes of solid waste. *Construction Impact Analysis* Based on the United States Environmental Protection Agency's (U.S. EPA) construction waste generation factor of 4.34 pounds of solid waste generated for the construction of every 1 s.f. for non-residential uses, Project construction is estimated to generate approximately 860.4 tons of solid waste. ([396,275 s.f. × 4.34 pounds per s.f.] ÷ 2,000 pounds per ton = 860 tons) (EPA, 2009, Table A-2). CalGreen requires a minimum of 65% of all construction waste be diverted from landfills (by recycling, reusing, and other waste reduction strategies); therefore, the Project is estimated to generate approximately 301.1 tons of construction waste requiring landfill disposal (860 tons × 0.35 = 301 tons). The Project's construction phase is estimated to last for up to 190 working days; therefore, the Project is estimated to generate approximately 1.58 tons of solid waste per day (301 tons ÷ 190 days = 1.58 tons per day) requiring landfill during construction. Non-recyclable construction waste generated by the Project would be disposed at the El Sobrante Landfill or Badlands Sanitary Landfill. As described above, these landfills receive well below their maximum permitted daily disposal volume; thus, the relatively minimal construction waste generated by the Project is not anticipated to cause the landfills to exceed their maximum permitted daily disposal volume. (Project construction waste would represent approximately 0.03% of the excess disposal capacity at the El Sobrante Landfill and approximately 0.08% of the excess disposal capacity at the Badlands Sanitary Landfill.) Furthermore, the El Sobrante Landfill and Badlands Sanitary Landfill are not expected to reach its total maximum permitted disposal capacities during the Project's construction period. The El Sobrante Landfill and Badlands Sanitary Landfill have sufficient daily capacity to accept solid waste generated by the Project's construction phase; therefore, impacts to landfill capacity associated with the Project's near-term construction activities would be less than significant. *Operational Impact Analysis* Based on a daily waste generation factor of 1.42 pounds of waste per 100 square feet of industrial building area obtained from CalRecycle, long-term, on-going operation of the Project would generate approximately 2.81 tons of solid waste per day ([[1.42 pounds ÷ 100 s.f.] × 396,275 s.f.] ÷ 2,000 pounds = 2.81 tons per day) (CalRecycle, 2019c). Pursuant to AB 939, at least 50 percent of the Project's solid waste is required to be diverted from landfills; therefore, the Project would generate approximately 1.41 tons of solid waste per day requiring landfilling (2.81 tons per day × 50% = 1.41 tons per day). Non-recyclable solid waste generated during long-term operation of the Project would be disposed at the El Sobrante Landfill and the Badlands Sanitary Landfill. As described above, these landfills receive well below their maximum permitted daily disposal volume; thus, waste generated by the Project's operation is not anticipated to cause the landfills to exceed their maximum permitted daily disposal volume. (Project operational rate would represent approximately 0.03% of the daily excess disposal capacity at the El Sobrante Landfill and approximately 0.07% of the daily excess disposal capacity at the Badlands Sanitary Landfill.) Because the Project would generate a relatively small amount of solid waste per day as compared to the permitted daily capacities at the receiving landfills, impacts to the El Sobrante Landfill and Badlands Sanitary Landfill facilities during the Project's long-term operational activities would be less than significant.				
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

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

Response: The California Integrated Waste Management Act (AB 939), signed into law in 1989, established an integrated waste management system that focused on source reduction, recycling, composting, and land disposal of waste. In addition, the bill established a 50 percent waste reduction requirement for cities and counties by the year 2000, along with a process to ensure environmentally safe disposal of waste that could not be diverted. Per the requirements of the Integrated Waste Management Act, the Riverside County Board of Supervisors adopted the County of Riverside Countywide Integrated Waste Management Plan (CIWMP), which outlines the goals, policies, and programs the County and its cities implement to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates. (RCDWR, 2020)

In order to assist the City of Moreno Valley and the County of Riverside in achieving the mandated goals of the Integrated Waste Management Act, the Project's building user(s) would be required to work with future refuse haulers to develop and implement feasible waste reduction programs, including source reduction, recycling, and composting. Additionally, in accordance with the California Solid Waste Reuse and Recycling Act of 1991 (Cal Pub Res. Code § 42911), the Project is required to provide adequate areas for collecting and loading recyclable materials where solid waste is collected. The collection areas are required to be shown on construction drawings and be in place before occupancy permits are issued. (CA Legislative Information, 2005) Additionally, in compliance with AB 341 (Mandatory Commercial Recycling Program), the future occupant(s) of the proposed Project would be required to arrange for recycling services, if the occupant generates four (4) or more cubic yards of solid waste per week (CA Legislative Information, 2011). The implementation of these mandatory requirements would reduce the amount of solid waste generated by the Project and diverted to landfills, which in turn will aid in the extension of the life of affected disposal sites. The Project Applicant would be required to comply with all applicable solid waste statutes and regulations; as such, impacts related to solid waste statutes and regulations would be less than significant.

Sources:

1. California Legislative Information – Assembly Bill 341 Solid Waste: Diversion, Approved October 5, 2011, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB341
2. California Legislative Information – Public Resources Code § 42911 – California Solid Waste Reuse and Recycling Access Act of 1991, Effective January 1, 2005, https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=42911
3. Eastern Municipal Water District – Sanitary Sewer System Planning & Design, Revised September 1, 2006, https://www.emwd.org/sites/main/files/file-attachments/emwdsewer_system_design.pdf?1542760914
4. Eastern Municipal Water District – Water System Planning & Design, Revised July 2, 2007, https://www.emwd.org/sites/main/files/file-attachments/emwdwater_system_design.pdf?1542760903
5. Eastern Municipal Water District – Moreno Valley Regional Water Reclamation Facility, October 2016, https://www.emwd.org/sites/main/files/file-attachments/mvrwrffactsheet.pdf?1537294991
6. Riverside County Department of Waste Resources – Countywide Integrated Waste Management Plan, 2020, https://www.rcwaste.org/business/planning/ciwmp
7. CalRecycle – SWIS Site/Facility Details: El Sobrante Landfill. Available at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2280?siteID=2402. Accessed October 1, 2020
8. CalRecycle – Daily Landfilled Tonnage & Total Traffic By Site: El Sobrante, July 2020. (CalRecycle, 2020a)
9. CalRecycle – SWIS Site/Facility Details: Badlands Sanitary Landfill. Available at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367. Accessed October 1, 2020
10. CalRecycle – Daily Landfilled Tonnage & Total Traffic By Site: Badlands, July 2020.

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?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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: The Project site is not located in or near state responsibility areas (SRA) or lands within a very high fire hazard severity zone (CalFire, 2007); therefore, the Project would not exacerbate wildfire hazard risks or expose people or the environment to adverse environmental effects related to wildfires. As such, no impact would occur.				
Sources: 1. California Department of Forestry and Fire Protection – Western Riverside County Fire Hazard Severity Zones in SRA, Adopted on November 7, 2007, https://osfm.fire.ca.gov/media/6752/fhszs_map60.pdf				
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: All impacts to the environment, including impacts to habitat for fish and wildlife species, fish and wildlife populations, plant and animal communities, rare and endangered plants and animals, and historical and pre-historical resources were evaluated as part of this IS/MND. Throughout this IS/MND, where impacts were determined to be potentially significant, mitigation measures have been imposed to reduce those impacts to less-than-significant levels. Accordingly, with incorporation of the mitigation measures imposed throughout this IS/MND, the Project would not substantially degrade the quality of the environment and impacts would be less than significant.				
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.)?	☐	☒	☐	☐

Response: As discussed throughout this IS/MND, implementation of the proposed Project has the potential to result in effects to the environment that are individually limited, but cumulatively considerable. In all instances where the Project has the potential to contribute to a cumulatively considerable impact to the environment, mitigation measures have been imposed to reduce potential effects to less-than-significant levels.

Aesthetics
New development on the Project site and in the surrounding area would change the existing character of the Project's viewshed; however, all development in the immediate vicinity of the Project would be required to comply with the development regulations and design standards contained in the City's Development Code, which would ensure that minimum standards related to visual character and quality are met to preclude adverse aesthetic effects (e.g., size, scale, building materials, lighting). Accordingly, the Project's aesthetic impacts would not be cumulatively considerable.

Agriculture and Forestry Resources
The Project would have no impact on agricultural resources. Therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic.

Air Quality
Based on SCAQMD guidance, any direct exceedance of a regional or localized threshold also is considered to be a cumulatively-considerable effect, while air pollutant emissions below applicable regional and/or localized thresholds are not considered cumulatively considerable. As discussed in the preceding analysis, the Project would not exceed SCAQMD's regional threshold for criteria pollutants during construction or operation of the Project. Therefore, Project-related construction and operation emissions are not considered cumulatively-considerable.

Biological Resources
The Project site does not support any sensitive plant or wildlife species; therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact under these resources. Although the Project site is highly disturbed and fragmented from other open space areas under existing conditions, the site does contain quality habitat for nesting birds and contains habitat that could be used by the burrowing owl. Therefore, there is the potential that nesting birds and/or the burrowing owl could be present on the Project site prior to construction and there also is the potential that other development projects in the Riverside area could support bird nests and/or the burrowing owl. The Project's potential impacts to nesting birds and the burrowing owl would be cumulatively considerable. MMs BR-1 and BR-2 would reduce the Project's cumulative effects to less-than-significant levels by ensuring that no direct take of nesting birds occurs during construction.

The Project would permanently impact habitat that is classified as: sensitive natural community, riparian/riverine habitat, and a State-protected wetland. Accordingly, the Project would contribute to a cumulatively-considerable impact under these resources. MM BR-3 would reduce the Project's cumulative effects to less-than-significant levels by ensuring that these impacts would be fully compensated through the purchasing of habitat mitigation credits.

Cultural Resources
The Project site does not contain historic or prehistoric archaeological resources and mandatory compliance with State law would preclude impacts to human remains; therefore, there is no potential for the Project to contribute to a cumulatively considerably impact to these resources.

Energy
The Project's construction and operation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary and would not obstruct a state or local plan for renewable energy or energy efficiency. In addition, all cumulative projects would also be required to comply with the California Building Standards Code, which establishes standards for energy efficiency and "green" construction. Therefore, implementation of the Project would result in a less-than-significant cumulative impact to energy.

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

Geology and Soils
Potential effects related to geology and soils are inherently site-specific; therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic. Furthermore, all development proposals would be required to comply with applicable federal, State, and local regulations that are in place to preclude adverse geology and soils effects, including effects related to strong seismic ground shaking, fault rupture, soil erosion, and hazardous soil conditions (e.g., liquefaction, expansive soils, landslides).

Notwithstanding, there is remote potential that paleontological resources are buried beneath the surface of the Project site and could be impacted during construction. Other projects within region would similarly have the potential to impact unknown, subsurface paleontological resources during ground-disturbing activities. Therefore, the potential for development on the Project site to impact subsurface paleontological resource deposits is a cumulatively considerable impact. Application of MMs GEO-1 through GEO-4 would reduce the Project's cumulative impacts to less-than-significant levels.

Greenhouse Gas Emissions
As described in the preceding analysis, global climate change (GCC) occurs as the result of global emissions of GHGs. An individual development project does not have the potential to result in direct and significant GCC-related effects in the absence of cumulative sources of GHGs. The CEQA Guidelines also emphasize that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impacts analysis (See CEQA Guidelines § 15130[f]). Accordingly, the preceding analysis reflects a cumulative impact analysis of the GHG emissions related to the Project. As concluded under Response VIII(a) and (b), the Project would not result in a cumulatively considerable impact related to GHG emissions.

Hazards and Hazardous Materials
Potential effects related to hazards and hazardous materials are inherently site-specific; therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic.

Hydrology and Water Quality
Construction and operation of the Project and other projects in the Santa Ana River watershed would have the potential to result in a cumulative water quality impact, including erosion and sedimentation. However, in accordance with applicable federal, State, and local regulations, all development projects would be required to implement plans during construction and operation (e.g., SWPPP and WQMP) to minimize adverse effects to water quality, which would avoid a cumulatively considerable impact.

The Project and other projects in the Santa Ana River Basin would be required to comply with federal, State, and local regulations in order to preclude flood hazards both on- and off-site. Compliance with federal, State, and local regulations would require on-site areas to be protected, at a minimum, from flooding during peak storm events (i.e., 100-year storm) and that proposed development would not expose downstream properties to increased flooding risks during peak storm events. Accordingly, a cumulatively considerable effect related to flooding would not occur.

Land Use and Planning
The Project would not physically divide an established community, or conflict with applicable land use/planning documents; therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact related to land use and planning.

Mineral Resources
The Project would have no impact on mineral resources. Therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic.

Noise
Noise levels diminish rapidly with distance; therefore, for a development project to contribute to a noise-related cumulative impact it must be located in close proximity to another development project or source of substantial noise. There are no construction projects in the immediate vicinity of the Project site that would overlap with Project-related construction activities. Accordingly, cumulatively-considerable impacts related to periodic noise and construction-related vibration would not occur. Under long-term

operating conditions the Project would comply with the City of Moreno Valley noise ordinance and would not produce noticeable levels of vibration; therefore, cumulatively considerable impacts related to these issue areas would not occur. The analysis provided under Response XIII(a) demonstrates that the Project would not result in a cumulatively-considerable impact related to transportation noise under long-term conditions.

Population and Housing

The Project would not implement land uses that generate new residents and would not require the construction of replacement housing. Accordingly, the City has anticipated – and planned for – the growth that would occur on the Project site and there is no potential for the Project to result in an adverse, cumulatively considerable environmental effect related to population and housing.

Public Services

All development projects in the City of Moreno Valley, including the Project, would be required to pay development impact fees, a portion of which would be used by the City for the provision of public services, to offset the incremental increase in demand for fire protection and police protection services. Furthermore, future development would generate an on-going stream of property tax revenue and sales tax revenue, which would provide funds that could be used by the City of Moreno Valley for the provision of fire and police protection services. The Project would not directly result in the introduction of new residents to the City and, therefore, would have no potential to result in cumulatively considerable impacts to resident-serving public facilities such as schools, parks, libraries, and other public facilities or services.

Recreation

The Project would have no impact to recreation facilities. Therefore, there is no potential for the Project to contribute to a cumulatively considerable impact under this topic.

Transportation

The Project would not conflict with any City policies addressing the circulation network and would not generate substantial VMT. Therefore, the Project would not contribute to any cumulatively-considerable adverse transportation effects.

Tribal Cultural Resource

Development activities on the Project site would not impact any known tribal cultural resources. However, there is the remote potential that such resources are buried beneath the surface of the Project site and could be impacted during construction. Other projects within region would similarly have the potential to impact unknown, subsurface tribal cultural resources during ground-disturbing activities. Therefore, the potential for development on the Project site to impact subsurface tribal cultural resource deposits is a cumulatively considerable impact. Application of MMs TCR-1 though TCR-6 would reduce the Project's cumulative impacts to less-than-significant levels.

Utilities and Service Systems

The Project would require water and wastewater infrastructure, as well as solid waste disposal for building operation. Development of public utility infrastructure is part of an extensive planning process involving utility providers and jurisdictions with discretionary review authority. The coordination process associated with the preparation of infrastructure plans is intended to ensure that adequate public utility services and resources are available to serve both individual development projects and cumulative growth in the region. Each individual development project is subject to review for utility capacity to avoid unanticipated interruptions in service or inadequate supplies. Coordination with the utility providers would allow for the provision of utility services to the Project and other developments. The Project and other planned projects are subject to connection and service fees to offset increased demand and assist in facility expansion and service improvements (at the time of need). Because of the utility planning and coordination activities described above, cumulatively considerable impacts to utilities and service systems would not occur.

Wildfire

The Project site is not located in a SRA or very high fire hazard area. Therefore, implementation of the Project would result in no adverse impacts associated with wildfire.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐
Response: The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this IS/MND. As demonstrated by this analysis, construction and operation of the Project would not involve any activities that would result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.				