

## **INITIAL STUDY FOR** **Brodiaea Development Residential Project** **Vesting Tentative Tract Map 39162 (PEN25-0013)**



**Lead Agency**  
**City of Moreno Valley**  
14177 Frederick Street  
Moreno Valley, CA 92552

**Prepared By**



**EPC Environmental Inc**  
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**October 29, 2025**

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<b>Appendix B</b>	General Biological Resources Assessment Report, Marah and Mallow Land Resources Consulting, April 27, 2025
<b>Appendix C</b>	Cultural Resources Survey Report, CRM Tech, March 15, 2025
<b>Appendix D</b>	Paleontological Resources Assessment Report, CRM Tech, March 16, 2025
<b>Appendix E</b>	Geotechnical Investigation, Alta California Geotechnical Inc., May 27, 2025
<b>Appendix F</b>	Phase 1 Environmental Site Assessment, Stantec, October 15, 2024
<b>Appendix G</b>	Preliminary Hydrology Study, C&V Consulting, Inc. Revised May 2025
<b>Appendix H</b>	Noise Measurement Data, ECORP,
<b>Appendix I</b>	Traffic Impact Analysis, TJW Engineering Inc. July 25, 2025
<b>Appendix J</b>	Vehicle Miles Traveled (VMT) Analysis, TJW Engineering Inc., July 25, 2025
<b>Appendix K</b>	Preliminary Water Quality Management Plan, C&V Consulting Inc., May 2025
<b>Appendix L</b>	Water and Sewer Will Serve Letter, EMWD, November 6, 2024



# ENVIRONMENTAL CHECKLIST FORM

## Background Information and Project Description

1. **Project Case Number(s):** PPA24-0031
2. **Project Title:** Brodiaea Avenue
3. **Public Comment Period:** May 22, 2026 to June 21, 2026
4. **Lead Agency:** City of Moreno Valley  
Kirt Coury, Planning Department  
14177 Frederick Street  
Moreno Valley, CA 92552  
(951) 413-3206  
kirtc@moval.org
5. **Documents Posted At:** <https://moval.gov/cdd/documents/about-projects.html>
6. **Prepared By:** EPC Environmental, Inc.  
11801 Pierce Street, Suite 200  
Riverside, CA 92505  
951-710-3010
7. **Project Sponsor:**

<b>Applicant/Developer</b> Moses Kim Warmington Residential 3090 Pullman Street Costa Mesa, CA 92626 (909) 659-1383 Email	<b>Property Owner</b> David Mieger, President EDM Realty Corp 170 Pacific Ave #42 San Francisco, CA 94111 (714) 288-0294 john@vikingintlre.com
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8. **Project Location:** South of Alessandro Boulevard, east of Moreno Beach Drive, west of Quincy Street, and north of Brodiaea Avenue (APNs) 478-070-015 (28136 Brodiaea Avenue), 478-070-013, 478-070-014, 478-080-003, 478-080-004, and 478-080-005).
9. **Existing General Plan Designation:** Existing: R3 (Residential)
10. **Specific Plan Name and Designation:** None.
11. **Existing Zoning:** R3 (Residential 3)

The Project site is currently classified as R3 Residential. The primary purpose of the R3 Residential land zoning classification is to provide a transition between rural and urban density development areas, and to provide for a suburban lifestyle on residential lots larger than those commonly found in suburban subdivisions. The maximum allowable density shall be 3.0 dwelling units per acre.

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

**Table 1: Land Uses, General Plan Designations, and Zoning Classifications**

	Land Use	General Plan	Zoning
Project Site	Single-story home with a stable for livestock and a small private greenhouse	R3-Residential)	R3 (Suburban Residential)
North	Residential development and a commercial garden store	R3-Residential	R3 (Suburban Residential)
South	Brodiaea Avenue, followed by residential development	R5-Residential R10- Residential	R5 (Suburban Residential) R10 (Suburban Residential)
East	Residential development	R3- Residential	R3 (Suburban Residential)
West	Undeveloped land	C -Commercial	Residential 3 (R3) Community Commercial (CC)

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

**Environmental Setting**

The Project site is located in the central portion of the City of Moreno Valley, south of Alessandro Boulevard, east of Moreno Beach Drive, west of Quincy Street, and north of Brodiaea Avenue. The Project site consists of six parcels, identified as Assessor Parcel Numbers (APNs) 478-070-015 (28136 Brodiaea Avenue), 478-070-013, 478-070-014, 478-080-003, 478-080-004, and 478-080-005. Regional access to the Project site is provided by State Route 60 (SR-60) and Interstate 215 (I-215). Local access to the Project site is provided by Brodiaea Avenue. See Figure 1, *Project Location Map*, and Figure 2, *Aerial View of the Project Site*.

The Project site is developed with two residential structures and undeveloped land. Historical records indicate the site was utilized for dry land farming between at least the 1930s to 1960s, and partially residentially developed by the 1960s. Adjoining properties, as well as the nearby surrounding area, generally include residential and commercial development.

**Figure 1. Project Location Map**



Figure 2. Aerial View of the Project Site



**Figure 4. Street Level View Looking North from Brodiaea Avenue**



## **Project Description**

The proposed Project would create 134 single-family detached residential lots on an approximately 14.4-gross-acre site with a density of approximately 9.3 du/ac. As shown in **Figure 4, Proposed General Plan Amendment Map Amendment**, and **Figure 5, Proposed Zoning Map Amendment**, the Project is proposing a General Plan amendment to R10 Residential and a Zoning Map amendment to R10 (Suburban Residential). The purpose of the R10 land use designation is to provide for a variety of residential products and to encourage innovation in housing types. The maximum allowable density shall be 10.0 dwelling units per acre. A Conditional Use Permit is also required to approve a Planned-Unit Development to establish unique standards for future residential units and site development.

### **Access and Circulation**

Site access will be via a proposed full-access two-lane roadway intersecting with Brodiaea Avenue.

### **Stormwater Runoff**

In the developed condition, a proposed storm drain system would convey runoff from the Project site to a proposed onsite detention basin located on the southwest corner of the site.

### **Architectural Design**

The Project features a variety of 3-bedroom and 4-bedroom floor plans ranging from 1,752 to 2,150 square feet of living area. Four types of architectural styles are provided: “Cottage,” “Farmhouse,” “Monterey,” and Santa Barbara” (see **Figure 9, Typical Building Elevations**).

### **Landscaping/Open Space**

The Project provides a linear turfed area with sidewalks that traverse the entire Project site from east to west. A 7,238-square-foot park area is provided that includes turf, picnic tables, bench seating, and a BBQ area. Street trees and landscaped areas are provided throughout the Project site (see **Figure 8, Landscape Concept Plan**).

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

*Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.*

The City has established a Tribal Historic Preservation Office (THPO) contact list pursuant to Public Resources Code §21080.3. The City has distributed letters to applicable THPOs on the City’s contact list, providing initial information about the Project and inviting consultation. Tribal consultation was completed in April, 2026 and the City has incorporated the requested mitigation measures and cultural resources report updates. See Section XVIII, *Tribal Cultural Resources*, of this IS/MND for additional information.

Figure 3. Proposed General Plan Land Use Map Amendment

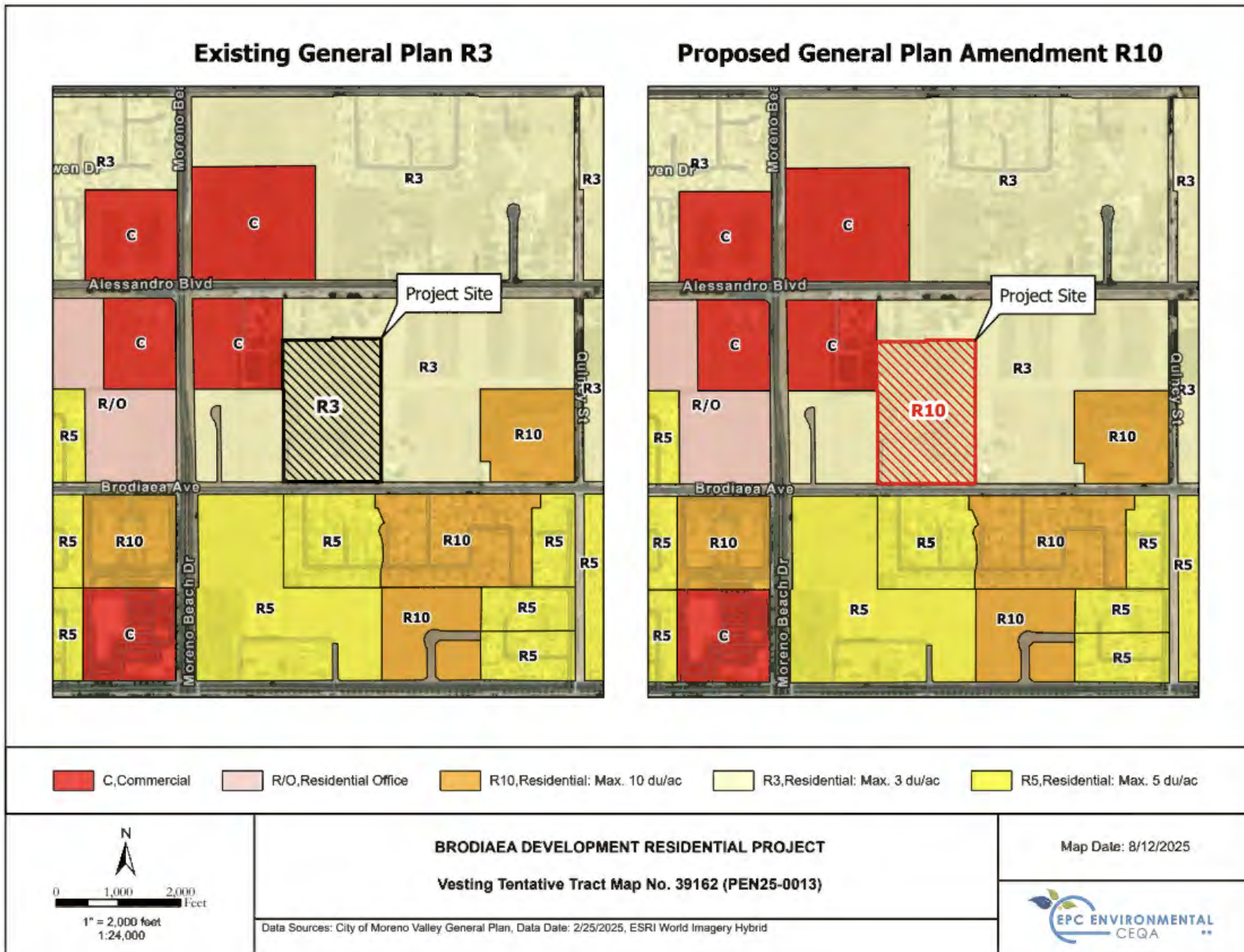


Figure 4. Proposed Zoning Map Amendment

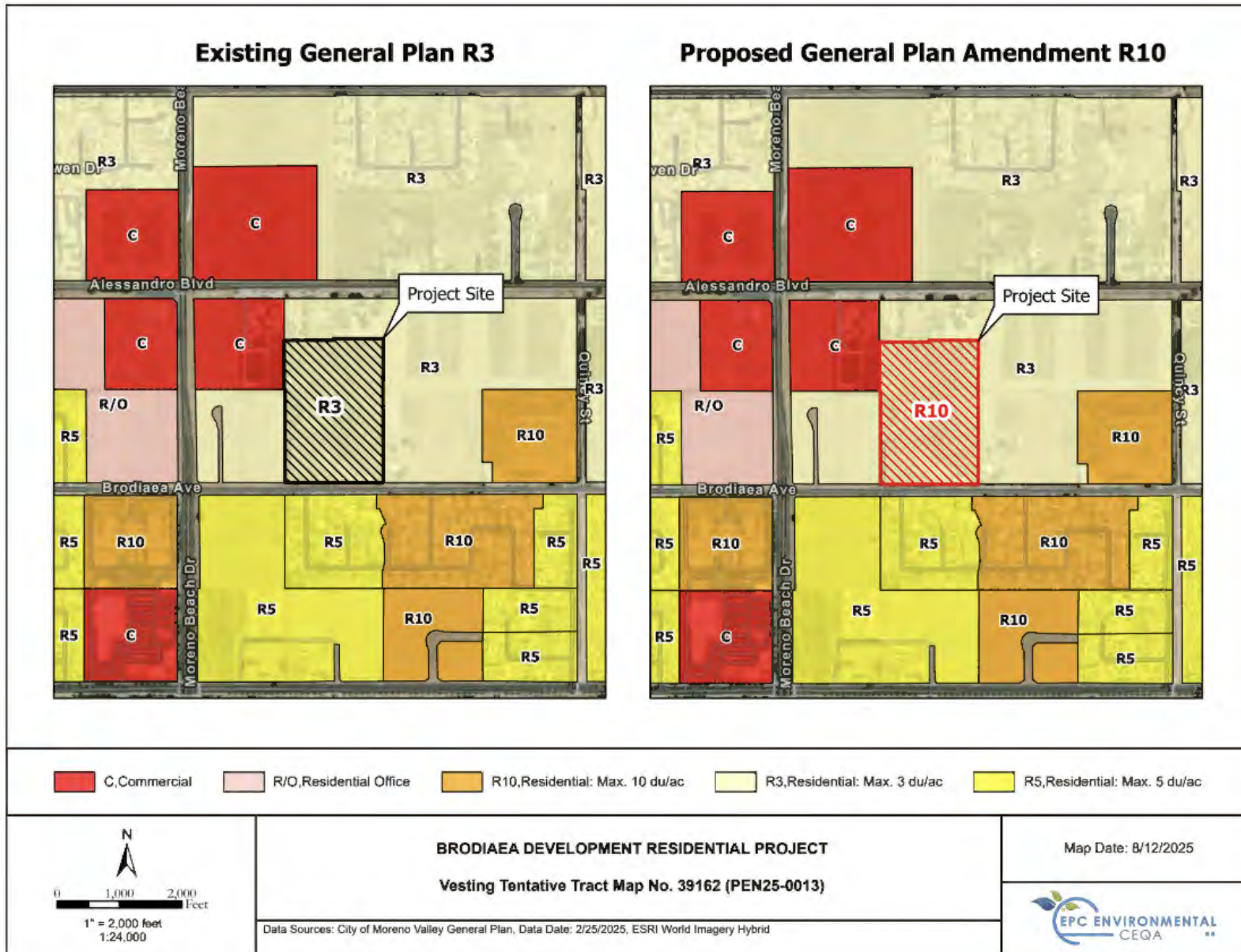


Figure 5. Vesting Tentative Tract Map

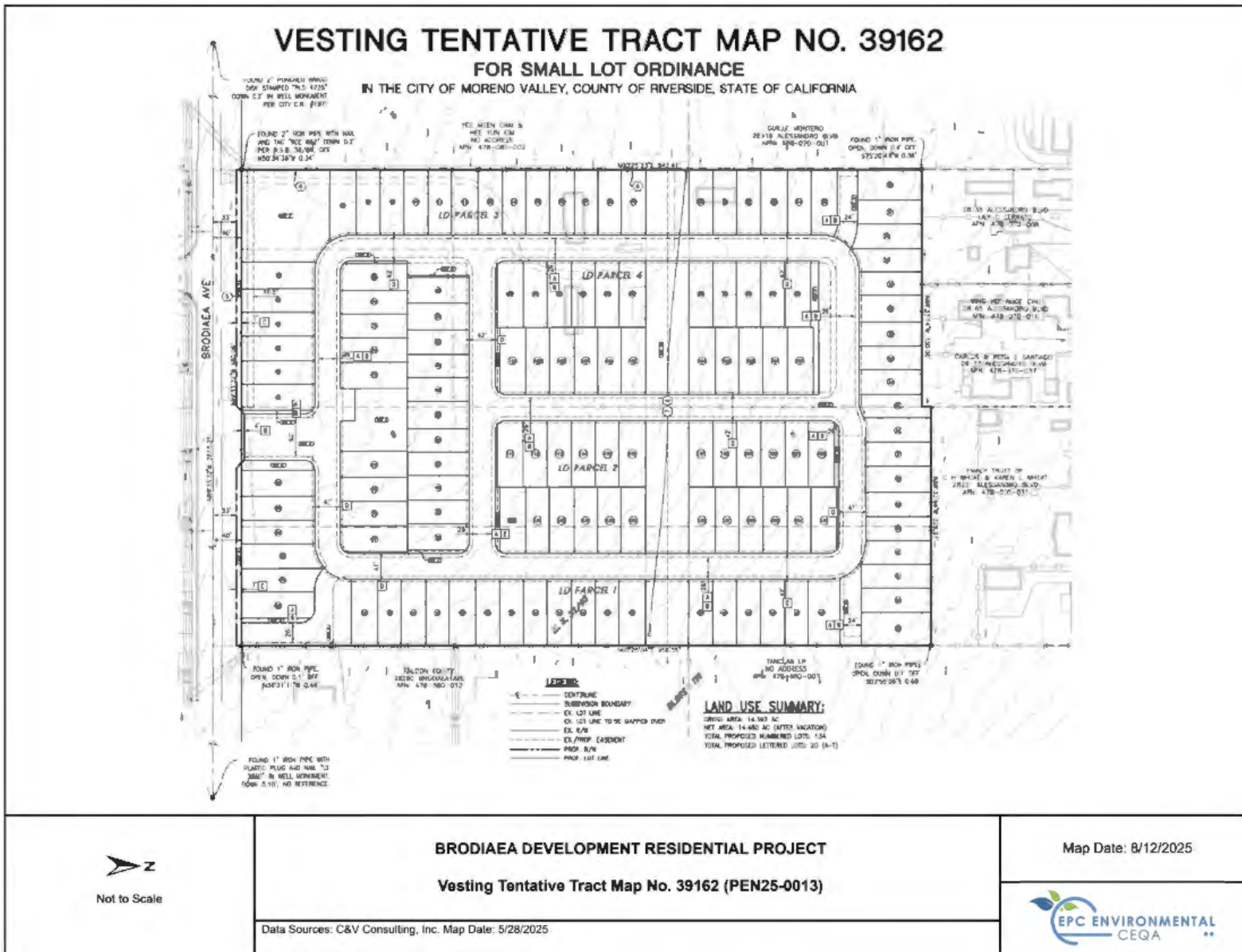
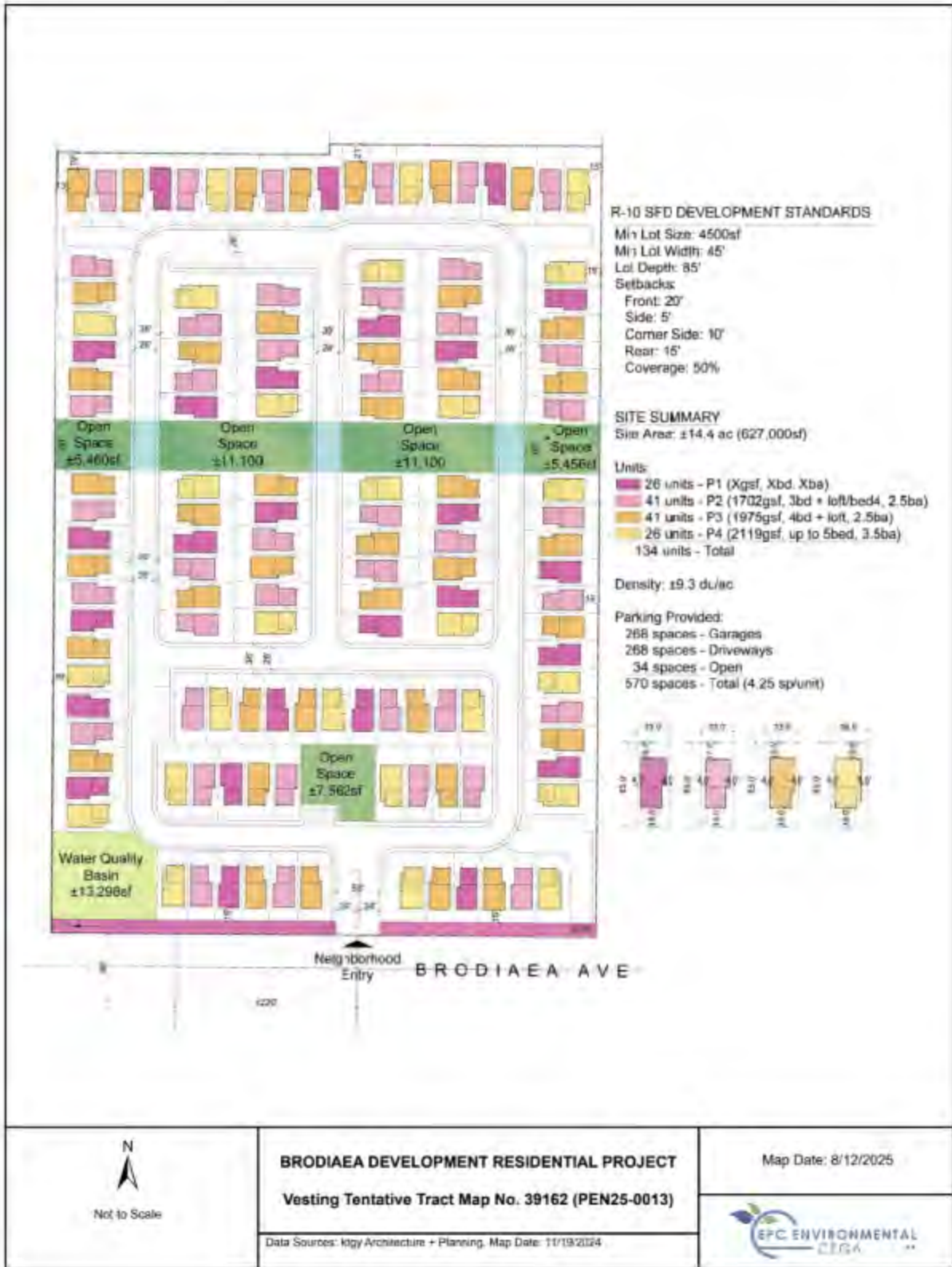


Figure 6. Site Plan



**Figure 7. Landscape Concept Plan**



- LEGEND**
- 1. MAIN ENTRY CORRIDOR
  - 2. EVA ACCESS CORRIDOR
  - 3. PIPELINE EASEMENT
  - 4. GAS EASEMENT



Not to Scale

**BRODIAEA DEVELOPMENT RESIDENTIAL PROJECT**  
**Vesting Tentative Tract Map No. 39162 (PEN25-0013)**

Map Date: 8/12/2025

Data Sources: BMLA Landscape Architecture. Map Date: 5/21/2025



**Figure 8. Typical Building Elevations**



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

- a. Eastern Municipal Water District (EMWD)- Water and wastewater connection permit
- b. Santa Ana Regional Water Quality Control Board- Section 401/Porter Cologne Act Permit, National Pollutant Discharge Elimination System (NPDES) Approval
- c. State Water Resources Control Board- Stormwater Pollution Prevention Plan (SWPPP) Approval

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

- A. Air Quality and Greenhouse Gas CalEEMod Summary Report
- B. General Biological Resources Assessment Report
- C. Cultural Resources Survey Report
- D. Paleontological Resources Assessment Report
- E. Geotechnical Investigation
- F. Preliminary Hydrology Study
- G. Traffic Impact Analysis
- H. Vehicle Miles Traveled (VMT) Analysis
- I. Phase 1 Environmental Site Assessment
- J. Preliminary Water Quality Management Plan
- K. Water and Sewer Will Serve Letter

17. **Acronyms:**

AAQS	Ambient Air Quality Standards
ADA	American with Disabilities Act
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AQMP	Air Quality Management Plan
BMP	Best Management Practice
CEQA	California Environmental Quality Act
CIWMD	California Integrated Waste Management District
CMP	Congestion Management Plan
DTS	Department of Toxic Substance Control
DWR	Department of Water Resources
EIR	Environmental Impact Report
EMWD	Eastern Municipal Water District
EOP	Emergency Operations Plan
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
GIS	Geographic Information System
GHG	Greenhouse Gas
GP	General Plan
HCM	Highway Capacity Manual
HOA	Homeowners' Association
IS	Initial Study
LHMP	Local Hazard Mitigation Plan
LOS	Level of Service
LST	Localized Significance Threshold
MARB	March Air Reserve Base
MARB/IP	March Air Reserve Base/Inland Port Airport
MSHCP	Multiple Species Habitat Conservation Plan
MVFP	Moreno Valley Fire Department
MVPD	Moreno Valley Police Department
MVUSD	Moreno Valley Unified School District

MWD	Metropolitan Water District
NCCP	Natural Communities Conservation Plan
NPDES	National Pollutant Discharge Elimination System
OEM	Office of Emergency Services
OPR	Office of Planning & Research, State
PEIR	Program Environmental Impact Report
PW	Public Works
RCEH	Riverside County Environmental Health
RCFCWCD	Riverside County Flood Control & Water Conservation District
RCP	Regional Comprehensive Plan
RCTC	Riverside County Transportation Commission
RCWMD	Riverside County Waste Management District
ROG	Reactive Organic Gases
RTA	Riverside Transit Agency
RTIP	Regional Transportation Improvement Plan
RTP	Regional Transportation Plan
SAWPA	Santa Ana Watershed Project Authority
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCH	State Clearinghouse
SKRHCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
USFWS	United States Fish and Wildlife
USGS	United States Geologic Survey
VMT	Vehicle Miles Traveled
VVUSD	Valley Verde Unified School District
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Government

**Environmental Factors Potentially Affected**

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

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

## Determination (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- 
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- 
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.
- 

\_\_\_\_\_  
Signature

Miguel Del Rio

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

City of Moreno Valley

\_\_\_\_\_  
For

## Evaluation of Environmental Impacts

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a Lead Agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the Lead Agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or

- more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
  - 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or another CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    - a) Earlier Analyses Used. Identify and state where they are available for review.
    - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
  - 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
  - 7) Supporting Information Sources. A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
  - 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
  - 9) The explanation of each issue should identify:
    - a) the significance criteria or threshold, if any, used to evaluate each question; and
    - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

## Issues & Supporting Information Sources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. Aesthetics</b> – Except as provided in <a href="#">Public Resources Code §21099</a> – Modernization of Transportation Analysis for Transit-Oriented Infill Projects – <b>Would the project:</b>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** A scenic vista is generally defined as a view of undisturbed natural lands exhibiting a unique or unusual feature that comprises an important or dominant portion of a viewshed. Scenic vistas may also be represented by a particular distant view that provides visual relief from less attractive views of nearby features. Other designated federal and state lands, as well as local open space or recreational areas, may also offer scenic vistas if they represent a valued aesthetic view within the surrounding landscape of nearby features.

According to the 2006 General Plan, the major aesthetics resources within the City include views of the mountains and southerly views of the valley. The major scenic resources within the City are visible from SR-60, the major transportation route in the area. In addition, as discussed in the 2006 General Plan and shown on Figure 7-2, Major Scenic Resources<sup>1</sup> of the 2006 General Plan, Moreno Peak is part of a prominent landform located south of SR-60 along Moreno Beach Drive, which is visible from the Project site.

According to the Map OSRC-6: Scenic Resources and Ridgelines,<sup>2</sup> of the City's 2040 General Plan, the Project site is located adjacent to a designated view corridor. Distant views of the Bernasconi Hills to the southeast and the Box Springs Mountains to the north are afforded from vantage points throughout the majority of the City. Under clear atmospheric conditions, motorists and pedestrians traveling along Brodiaea Avenue and Alessandro Boulevard have partial views of these scenic resources, as the viewshed is obstructed by off-site trees, overhead powerlines, and buildings. Thus, the Project would not have a substantial adverse effect on a scenic vista in this regard, and impacts would be less than significant. However, these views are distant, obstructed, and not expansive. The proposed Project would have a maximum building height of 27 feet, or two stories, consistent with surrounding development. As such, it is not expected that the new residential buildings would block views of or from the identified scenic resources. Impacts to scenic resources would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** There are no officially designated state scenic highways in the City. The nearest scenic highways are State Route 74 (SR-74) (designated as eligible for listing), located approximately 12

1 [https://www.moval.org/city\\_hall/general-plan/06gpfinal/gp/7-conserv.pdf](https://www.moval.org/city_hall/general-plan/06gpfinal/gp/7-conserv.pdf)

2 <https://moval.gov/cdd/pdfs/projects/mv2040/OpenSpace.pdf>

miles south of the Project site, and State Route 243 (SR-243) (officially designated), located approximately 18 miles east of the Project site.<sup>3</sup>

Views of the Project site are not afforded from SR-74 or SR-243 due to intervening topography, structures, and vegetation. Thus, the Project would not substantially damage scenic resources within a state scenic highway. No impact would occur in this regard.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The proposed Project includes grading and construction of a 134-unit single-family residential development and would include installation of right-of-way improvements such as sidewalks, street lighting, and landscaping. The Project site is located within a moderately developed portion of the City and is surrounded by single-family residential development to the north, east, and south, and by office and educational facilities to the west. Thus, for the purposes of this threshold, the analysis considers whether the Project would conflict with applicable zoning or other regulations governing scenic quality.

The architectural design of the Project would adhere to the requirements of 2040 General Plan Land Use and Community Character Element Policy LCC.3-15, which requires that new Project designs provide building placement variations, roofline variations, architectural projections, and other embellishments to enhance the visual interest along residential streets. The Project design would also adhere to the 2040 General Plan Land Use and Community Character Element Policy LCC.3-13, which states that new and retrofitted fences and walls should incorporate landscape elements and changes in materials or texture to deter graffiti and add visual interest. In addition, as described previously, upon approval of the proposed Zone Change from Residential (R3) to Residential (R10), the proposed Project would be consistent with development standards required by the R10 land use and zoning designation, as well as the both the 2006 and 2040 General Plan Conservation Element and Land Use and Community Character Element (respectively) goals and policies related to scenic quality.

While Project implementation would change the visual quality of the site and its surroundings, the proposed Project would not degrade the visual quality of the Project area because the Project is consistent with the City's design guidelines and is consistent with the surrounding development. Therefore, with adherence to the City's design policies and goals, impacts would be less than significant.

<sup>3</sup> California Department of Transportation State Scenic Highway System Map.  
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.  
 Accessed March 24, 2025

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Because the Project is located in a moderately urbanized area, existing sources of light and glare typically come from vehicles traveling on Alessandro Boulevard and Brodiaea Avenue, streetlights, exterior lighting on surrounding development, and reflection from windows and roofs on the surrounding development.

### Construction Impacts

Project construction could result in temporary glare impacts as a result of construction equipment and materials present at the site. However, based on the Project's limited scope of construction activities, these sources of glare would not be substantial, compared to the existing building materials present in the surrounding area. Construction of the proposed Project would be restricted to the City's permitted construction hours in accordance with Moreno Valley Municipal Code Chapter 8.14.040, Miscellaneous Standards and Regulations, which are limited to between the hours of 7:00 a.m. to 8:00 p.m. Monday through Friday, excluding holidays and from 8:00 a.m. to 4:00 p.m. on Saturday. Although some lighting may be required in the early morning or late evening, this lighting would be minimal and consistent with the existing sources of light from the surrounding residential uses, as well as the lights from traffic along Brodiaea Avenue and Alessandro Boulevard. Therefore, no adverse light or glare impacts to adjacent properties would result from temporary construction activities, and impacts would be less than significant.

### Operational Impacts

Project operations would create new light sources from interior and exterior illumination associated with building materials, windows, exterior lighting, and security lighting. Interior and exterior lighting would conform to the California Green (CALGreen) Building Standards Code and Moreno Valley Municipal Code Article VI, Applications for Lighting, Chapter 9.16.280, General Requirements. All outdoor lighting would be automatic and programmable to turn on at certain times as necessary as well as adjustable to dim the light intensity between 40 percent and 80 percent to meet the efficiency requirements of California's Building Energy Efficiency Standards (Title 24, Parts 6 and 11).

Although the Project would increase light and glare in the surrounding area, light and glare produced on-site would be similar to that of the surrounding development. Adherence to state and local standards and regulations would reduce impacts to less than significant levels. Impacts would be less than significant.

### Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>II. Agriculture and Forest Resources</b> – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire				

Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resources Board. **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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**Response:** The California Department of Conservation (DOC) manages the Farmland Mapping and Monitoring Program (FMMP), which identifies and maps significant farmland in the State of California. Pursuant to Public Resources Code §21060.1, farmland is classified using a system of five categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land. The classification of farmland as Prime Farmland, Farmland of Statewide Importance, and Unique Farmland is based on the suitability of soils for agricultural production, as determined by a soils survey conducted by the National Resources Conservation Service.

According to the FMMP, a majority of the Project site is identified as “Farmland of Local Importance.” The site is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Farmland of Local Importance is farmland important to the local agricultural economy as determined by the County Board of Supervisors and a local advisory committee. Per the City’s 2006 General Plan, agricultural land within the City is generally leased to farm operators. Few, if any of the farms within the valley are owner-operated. Several major types of agriculture take place in Moreno Valley: grazing, fruit orchards, dry grain farming, potato and fruit crop farming, and poultry production. Nearly all of the remaining agricultural use occurs in the rural eastern portion of Moreno Valley. The 2040 General Plan and the General Plan EIR state that a variety of economic factors have caused farming to decrease substantially over recent decades. The City has a long history of agricultural use dating back to when Moreno Valley was originally settled in the 1850s; however, the high cost of land, the high cost of water and energy, fragmented ownership patterns, and market conditions have limited potential returns on investment, which have combined to disincentivize the continuation of agricultural production. As such, urban development has encroached on agricultural land within Moreno Valley over time as agricultural production is no longer a strong component of the City’s economy.

Both the City’s 2040 General Plan and the General Plan EIR account for the conversion of agricultural uses to urban uses as a result of new development and do not propose any permanent preservation of agricultural land. The proposed Project is consistent with the City’s 2006 and 2040 General Plans, because the Project site is located within a planning area identified for urban development and anticipated conversion of agricultural land to non-agricultural urban uses. Further, the Project site is not designated as agriculture on the City’s existing land use map; rather, it is designated as residential land use. As such, development under the 2006 and 2040 General Plans is consistent with the orderly transition of agricultural land to other urban and rural land uses pursuant to the 2006 General Plan’s Parks, Recreation and Open Space Element Objective 4.1, and 2040 General Plan Open Space and Resource Conservation Element Policy OSCR.1-6. Therefore, the impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** As previously discussed, the Project site has a zoning classification of R3 (Suburban Residential), This is consistent with surrounding residential development to the north, east, and south. The properties to the west, east, and south of the Project site are zoned R3 and R5. The parcel to the northwest is zoned CC Commercial.

The Suburban Residential zoning classification is intended to provide a transition between rural and urban density development areas, and to provide for a suburban lifestyle consisting of single-family residences. Agricultural uses are restricted to the Open Space-Agriculture (AG) district. There is no AG zoning in the vicinity of the Project site.

Further, no agricultural operations currently occur at the Project site, and the Project site is not covered under an existing Williamson Act contract according to the County of Riverside Tax Assessor.<sup>4</sup> Thus, impacts related to conflicts with existing zoning for agricultural use or a Williamson Act contract would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** The City does not have any zoning classifications for forestland, timberland, or timberland production zones. As such, Project implementation would not conflict with existing zoning of, or result in the rezoning of forestland, timberland, or timberland zoned Timberland Production. Therefore, no impact would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** Refer to Response II.c) above. No impact would occur in this regard.

4 Riverside County Parcel Report: <https://gis1.countyofriverside.us/Geocortex/Reporting/service/job/result?ticket=eyJhbGciOiJub25liiwieWlwoiREVGIn0.q1ZKzs9TsqpWUimpLEhVslLyKi8JyUzOTi1xzs8rSc0rUdJRySpP8kwBSeUnFRvrp1qkmKYZmAGRRbJJUrJ5kqmRoZmBcUpymomhuYFlolJtLQA.&tag=35ba68675b754edea6b7d1b575ace465>. Accessed July 6, 2025.

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

**Response:** Refer to Responses II.a) through II.d) above. Less than significant impacts would occur in this regard.

**Mitigation Measures**

None required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. Air Quality</b> – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. <b>Would the project:</b>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The Project is located within the South Coast Air Basin (SCAB), which is governed by the South Coast Air Quality Management District (SCAQMD). The U.S. Environmental Protection Agency (U.S. EPA) requires areas that do not meet a National Ambient Air Quality Standard (NAAQS or standard) to develop and submit a State Implementation Plan (SIP) for approval. SIPs are used to show how the region will meet the standard. Regions must attain NAAQS by specific dates or face the possibility of sanctions by the federal government and other consequences under the Clean Air Act (CAA). This can result in increased permitting fees, stricter restrictions for permitting new projects, and the loss of federal highway funds. The South Coast AQMD SIPs are developed within the ACAQMD’s Air Quality Management Plans (AQMPs). The most recent AQMP was developed in 2016 and addressed the 1997 8-hour and 2008 8-hour ozone standards, as well as PM2.5 standards. On December 2, 2022, the SCAQMD Governing Board adopted the 2022 Air Quality Management Plan (2022 AQMP).<sup>5</sup> The 2022 AQMP is focused on attaining the 2015 8-hour ozone standard of 70 parts per billion (ppb).

According to the SCAQMD, “South Coast AQMD is in the process of developing an "Air Quality Analysis Guidance Handbook" (Handbook) to replace the CEQA Air Quality Handbook approved by the South Coast AQMD Governing Board in 1993.<sup>6</sup> Until the 1993 Handbook is updated, the SCAQMD provides a list of supplemental information on their website to guide the preparation of an air quality impact analysis.

- (1) Whether the proeject 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 timely attainment of air quality standards or the interim emission reductions specified in the AQMP (except as provided for CO in Section 9.4 for relocating CO hot spots). 1993 XX, page. 12-2

5 South Coast AQMD, 2022 Air Quality Management Plan, [https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=edcebd61\\_16](https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=edcebd61_16), accessed July 6, 2025.

6 SCAQMD Website, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>, accessed July 6, 2025.

- (2) Whether the project will exceed the assumptions in the AQMP in 2010 or increments based on year of project build-out and phase (Table 12-2).

“Table 12-2. Key Assumptions

Key assumption for Residential Projects Population Number and Location. Regional Housing Needs Assessment”.

### Criterion 1

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a Project include forecasts of Project emissions in relation to contributing to air quality violations and delay of attainment.

- a) *Would the Project result in an increase in the frequency or severity of existing air quality violations?*

Since the consistency criteria identified under the first criterion pertains to pollutant concentrations, rather than total regional emissions, an analysis of the Project’s pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating Project consistency. As discussed in Response (IIIc) below, localized concentrations of carbon monoxide (CO), nitrogen oxide (NO<sub>x</sub>), particulate matter less than 10 microns in diameter (PM<sub>10</sub>), and particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) would be less than significant during Project construction and operation. Therefore, the proposed Project would not result in an increase in the frequency or severity of existing air quality violations.

- b) *Would the Project cause or contribute to new air quality violations?*

As discussed in Responses (III b) and (III c), the proposed Project would result in emissions that are below the SCAQMD thresholds for regional and localized emissions. Therefore, the Project would not have the potential to cause or affect a violation of the ambient air quality standards.

- c) *Would the Project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?*

The proposed Project would result in less than significant impacts with regard to regional and localized concentrations during Project construction and operation; refer to Responses (III b) and (IIIc) below. As such, the Project would not delay the timely attainment of air quality standards or 2022 AQMP emissions reductions.

### Criterion 2

The 2022 AQMP was prepared by SCAQMD and adopted on December 2, 2022. It is important to recognize that air quality planning within the Basin focuses on the attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, SCAQMD’s second criterion for determining Project consistency focuses on whether the Project exceeds the assumptions utilized in preparing the emission forecasts presented in the 2022 AQMP to the degree that the control measures are no longer valid and the emission reduction targets are compromised.

Determining whether a Project exceeds the assumptions reflected in the 2022 AQMP involves the evaluation of the criterion stated below.

- a) *Would the Project exceed the population number and location or Regional Housing Needs Assessment identified in the AQMP?*

A Project is consistent with the 2022 AQMP in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the 2022 AQMP. Future growth

projections were based on demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by SCAG for their 2020 RTP/SCS. **Table 2**, Baseline Demographic Forecasts in the 2022 AQMP (Millions), compares the population and housing assumptions included in the 2022 AQMP.

**Table 2: Baseline Demographic Forecasts in the 2022 AQMP**

Category	2018 (millions)	2037 (millions)	2037% Growth from 2018
Population	16.7	18.6	12%
Housing Units	5.3	6.2	17%

Source: [https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/06-ch3.pdf?sfvrsn=a1c5bd61\\_18\\_p3-22](https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/06-ch3.pdf?sfvrsn=a1c5bd61_18_p3-22)

As shown in **Table 2**, *Baseline Demographic Forecasts in the 2022 AQMP* current forecasts indicate that the region will experience population growth of 12% between 2018 and 2037. Housing units show the largest change of socioeconomic indicators with a projected 17% increase from 2018 to 2037.

The Project’s incremental increase in housing units and population is shown in **Table 3**, *Jurisdiction-Level Growth Forecast Compared to Proposed Project*, below.

**Table 3: Jurisdiction-Level Growth Forecast Compared to Proposed Project**

Category	SCAG Forecast	With Proposed General Plan Amendment	Increase in Growth Compared to SCAG Forecast (%)
Housing Units	76,200	76,299	0.12%
Population	266,800	267,180	0.14%

Source: Connect SoCal, Jurisdiction-Level Growth Forecast, [https://scag.ca.gov/sites/default/files/old/file-attachments/0903fconnectsocal\\_demographics-and-growth-forecast.pdf?1606001579](https://scag.ca.gov/sites/default/files/old/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579), accessed July 6, 2025.

As shown in **Table 3**, above, the Project’s incremental increase only results in a 0.12% increase in housing units and a 0.14% increase in population above the SCAG Growth Forecast used in the preparation of the 2022 AQMP.

Additionally, as stated in CEQA Guidelines §15206. Projects of Statewide, Regional, or Areawide Significance:

“(b) (2) **A project has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located.** Examples of the effects include generating significant amounts of traffic or interfering with the attainment or maintenance of state or national air quality standards. Projects subject to this subdivision include: (A) **A proposed residential development of more than 500 dwelling units.** (B) A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space. (C) A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space. (D) A proposed hotel/motel development of more than 500 rooms. (E) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area”. (emphasis added).

In conclusion, the proposed General Plan amendment would not alter the assumptions contained in the 2022 AQMP to the extent that the Project would result in a long-term impact on the region’s ability to meet state and federal air quality standards as intended by the 2022 AQMP. Therefore, therefore,

considered consistent with the 2022 AQMP. Impacts associated with consistency with the 2022 AQMP would be **less than significant**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response:**

**Short-Term Construction Emissions**

The Project involves construction activities associated with grading, building construction, paving, and architectural coating applications. The Project would be constructed over approximately 19 months. Exhaust emission factors for typical diesel-powered heavy equipment are based on the California Emissions Estimator Model version 2022.1.1.29 (CalEEMod) program defaults. Variables factored in estimating the total construction emissions include the level of activity, length of construction period, number of pieces and types of equipment in use, site characteristics, weather conditions, number of construction personnel, and the quantity of materials to be transported on- or off-site. The analysis of daily construction emissions has been prepared utilizing CalEEMod. Refer to **Appendix A, Air Quality and Greenhouse Gas CalEEMod Summary Report**, for the outputs and results. **Table 4, Project-Generated Construction Emissions (Without Mandatory Control Measures)**, presents the anticipated daily short-term construction emissions.

**Table 4: Peak Project-Generated Construction Emissions (Without Mandatory Control Measures)**

Emissions Source	Pollutant (pounds/day) <sup>1,2</sup>					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Year 1 Summer	3.22	29.2	30.1	0.06	9.14	5.14
Year 1 Winter	3.21	29.2	29.8	0.05	9.14	5.14
Year 2 Summer	81.9	10.0	16.3	0.03	1.10	0.50
Year 2 Winter	1.22	10.0	15.5	0.03	1.10	0.50
<b>Maximum Daily Emissions</b>	<b>81.9</b>	<b>29.2</b>	<b>30.1</b>	<b>0.06</b>	<b>9.14</b>	<b>5.14</b>
<i>SCAQMD Thresholds</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<b>Threshold Exceeded?</b>	<b>YES</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes:

1. Emissions were calculated using CalEEMod version 2022.1.1.29.
2. The reduction/credits for construction emissions are based on “mitigation” included in CalEEMod and are required by the SCAQMD Rules. The adjustments applied in CalEEMod includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces two times daily; cover stockpiles with tarps; and limit speeds on unpaved roads to 15 miles per hour. The emissions results in this table represent the “unmitigated” emissions shown in [Appendix 1](#).

Source: Appendix A, Air Quality and Greenhouse Gas CalEEMod Summary Report.

**Table 5: Peak Project-Generated Construction Emissions (With Mandatory Controls Measures)**

Emissions Source	Pollutant (pounds/day) <sup>1,2</sup>					
	ROG	NOX	CO	SO2	PM10	PM2.5
Year 1 Summer	3.22	29.2	30.1	0.06	9.14	5.14
Year 1 Winter	3.21	29.2	29.8	0.05	9.14	5.14
Year 2 Summer	41.0	10.0	16.3	0.03	1.10	0.50
Year 2 Winter	1.22	10.0	15.5	0.03	1.10	0.50
<b>Maximum Daily Emissions</b>	<b>41.0</b>	<b>29.2</b>	<b>30.1</b>	<b>0.06</b>	<b>9.14</b>	<b>5.14</b>
SCAQMD Thresholds	75	100	550	150	150	55
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes:

1. Emissions were calculated using CalEEMod version 2022.1.1.29.
2. The reduction/credits for construction emissions are based on "mitigation" included in CalEEMod and are required by the SCAQMD Rules. The adjustments applied in CalEEMod includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces two times daily; cover stockpiles with tarps; and limit speeds on unpaved roads to 15 miles per hour. The emissions results in this table represent the "unmitigated" emissions shown in Appendix 1.

Source: Appendix A, Air Quality and Greenhouse Gas CalEEMod Summary Report.

**Fugitive Dust Emissions**

Construction activities are a source of fugitive dust emission that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from grading, excavation and construction is expected to be short-term and would cease upon Project completion. Most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. Particulate health concerns is the amount of PM10 generated as part of fugitive dust emissions. PM10 poses a serious health hazard alone or in combination with other pollutants. PM2.5 is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. PM2.5 is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NOX and SOX combining with ammonia. PM2.5 components from material in the Earth's crust, such as dust, are also present, with the amount varying in different locations.

The Project would implement required SCAQMD dust control techniques (i.e., daily watering), limitations on construction hours, and adhere to SCAQMD Rules 402 and 403 (which require watering of inactive and perimeter areas, track out requirements, etc.), to reduce PM10 and PM2.5 concentrations. As depicted in **Table 5, Peak Project-Generated Construction Emissions (With Mandatory Controls Measures)**, total PM10 and PM2.5 emissions would not exceed the SCAQMD thresholds during construction. Thus, PM10 and PM2.5 emissions impacts associated with Project construction would be **less than significant**.

### **Construction Equipment and Worker Vehicle Exhaust**

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the Project site, construction worker commutes to the Project site, emissions produced on-site as the equipment is used, and emissions from trucks transporting materials to/from the site. As presented in **Table 5, Peak Project-Generated Construction Emissions (With Mandatory Controls Measures)**, construction equipment and worker vehicle exhaust emissions (i.e., ROG, NOX, CO, SO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>) would not exceed the established SCAQMD thresholds for all criteria pollutants. Therefore, impacts in this regard would be **less than significant**.

### **ROG Emissions**

In addition to gaseous and particulate emissions, the application of asphalt and architectural coatings create ROG emissions. In accordance with the methodology prescribed by the SCAQMD, ROG emissions associated with paving and architectural coating have been quantified with the CalEEMod model. As required by SCAQMD Regulation XI, Rule 1113 – *Architectural Coating*, all architectural coatings would comply with specifications on painting practices as well as regulation on the ROG content of paint. Therefore, impacts would be **less than significant**.

### **Total Daily Construction Emissions**

As indicated in **Table 5, Peak Project-Generated Construction Emissions (With Mandatory Controls Measures)**, criteria pollutant emissions during construction of the proposed Project would not exceed the SCAQMD significance thresholds. Thus, total construction related air emissions would be less than significant with mitigation incorporated on Total Daily Construction Emissions.

### **Naturally Occurring Asbestos**

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by state, federal, and international agencies and was identified as a toxic air contaminant by CARB in 1986.

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill Projects, and other improvement Projects in some localities. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development Projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. According to the California Department of Conservation Division of Mines and Geology, serpentinite and ultramafic rocks are not known to occur within the Project area. Thus, **no impacts** would occur in this regard.

### **Long-Term Operational Emissions**

Operational emissions generated by both stationary and mobile sources would result from normal daily activities on the Project site after occupation (i.e., increased concentrations of ROG, NOX, SO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and CO). Mobile source emissions would be generated by the motor vehicles traveling to and from the Project site. Stationary area source emissions would be generated by the reapplication of architectural coatings, operation of landscape maintenance equipment, potential machinery, and use of consumer products. Stationary energy emissions would result from natural gas consumption associated with the Project. Emissions associated with each source are detailed in **Table 6, Project-Generated Operational Emissions**, and are discussed below.

**Table 6: Project-Generated Operational Emissions**

Emissions Source	Pollutant (pounds/day) <sup>1</sup>					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Project Summer Emissions</b>						
Area	6.71	0.07	7.61	<0.005	<0.005	<0.005
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	4.81	3.93	36.4	0.09	8.14	2.11
<b>Total Summer Emissions</b>	<b>11.5</b>	<b>4.00</b>	<b>44.0</b>	<b>0.09</b>	<b>8.15</b>	<b>2.11</b>
Significance Threshold <sup>2</sup>	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Project Winter Emissions</b>						
Area	6.04	-	-	-	-	-
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	4.5	4.20	31.0	0.09	8.14	2.11
<b>Total Winter Emissions</b>	<b>10.5</b>	<b>4.20</b>	<b>31.00</b>	<b>0.09</b>	<b>8.14</b>	<b>2.11</b>
Significance Threshold <sup>2</sup>	55	55	550	150	150	55
<b>Threshold Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes:

1. Emissions were calculated using CalEEMod version 2022.1.1.29.
2. Regional daily thresholds are based on the SCAQMD significance thresholds. Refer to Appendix 1 for assumptions used in this analysis.

### **Mobile Source**

Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> are all pollutants of regional concern (NO<sub>x</sub> and ROG react with sunlight to form O<sub>3</sub> [photochemical smog], and wind currents readily transport SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>). However, CO tends to be a localized pollutant, dispersing rapidly at the source.

The mobile source emissions were calculated using the trip generation data provided in the Brodiaea Avenue Traffic Impact Analysis (Traffic Analysis) developed by TJW Engineering, Inc. (dated February 27, 2025). According to the Traffic Analysis, the proposed Project would generate approximately 1,264 average daily trips, including 94 trips during a.m. peak hour and 126 trips during p.m. peak hour trips. As shown in **Table 6, Project-Generated Operational Emissions**, the emissions generated by vehicle traffic associated with the Project would not exceed established SCAQMD thresholds. Impacts from mobile source emissions would be less than significant.

### **Area Source Emissions**

Area source emissions would be generated from consumer products, area architectural coatings, and landscaping equipment associated with the development of the proposed Project. The Project would use all-electric landscaping equipment throughout the Project site and conservatively, has not been accounted for in **Table 6, Project-Generated Operational Emissions**. As shown in **Table 6**, area source emissions during both summer and winter would not exceed established SCAQMD thresholds. Impacts would be **less than significant** in this regard.

### **Energy Source Emissions**

The Project does not include natural gas and is electric only therefore operational emissions do not include emissions from natural gas use. The Project has been designed to exceed Title 24 standards and would install high efficiency lighting fixtures and energy efficient appliances and conservatively, all of which have not been accounted for in **Table 6**. Energy source emissions during both summer

and winter would not exceed established SCAQMD thresholds; refer to **Table 6**. Impacts in this regard would be **less than significant**.

### **Total Operational Emissions**

As shown in **Table 6**, the total operational emissions for both summer and winter would not exceed established SCAQMD thresholds. Impacts in this regard would be **less than significant**.

### **Air Quality Health Impacts**

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, O<sub>3</sub> precursors, VOCs and NO<sub>x</sub>, affect air quality on a regional scale. Health effects related to O<sub>3</sub> are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating Project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the Project's less than significant increases in regional air pollution from criteria air pollutants would have nominal or negligible impacts on human health.

Further, as noted in the *Brief of Amicus Curiae* by the SCAQMD, the SCAQMD acknowledged it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants for various reasons modeling limitations as well as where in the atmosphere air pollutants interact and form.<sup>7</sup> Furthermore, as noted in the *Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District* (SJVAPCD), SJVAPCD has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development Project's air emissions and specific human health impacts.<sup>8</sup>

The SCAQMD acknowledges that health effects quantification from O<sub>3</sub>, as an example is correlated with the increases in ambient level of O<sub>3</sub> in the air (concentration) that an individual person breathes. SCAQMD's *Brief of Amicus Curiae* states that it would take a large amount of additional emissions to cause a modeled increase in ambient O<sub>3</sub> levels over the entire region. The SCAQMD states that based on their own modeling in the SCAQMD's *2012 Air Quality Management Plan*, a reduction of 432 tons (864,000 pounds) per day of NO<sub>x</sub> and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce O<sub>3</sub> levels at highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O<sub>3</sub>-related health impacts caused by NO<sub>x</sub> or VOC emissions from relatively small Projects (defined as Projects with regional scope) due to photochemistry and regional model limitations. Thus, as the Project would not exceed SCAQMD thresholds for construction and operational air emissions, the Project would have a **less than significant** impact for air quality health impacts.

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7 <https://supreme.courts.ca.gov/document/amicus-curiae-brief-south-coast-air-quality-management-district>

8 <https://supreme.courts.ca.gov/document/amicus-curiae-brief-san-joaquin-valley-unified-air-pollution-control-district>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Localized Significance Thresholds (LSTs) were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized air quality impacts. The SCAQMD provides the LST lookup tables for 1-, 2-, and 5-acre Projects emitting CO, NO<sub>x</sub>, PM<sub>2.5</sub>, and/or PM<sub>10</sub>. The LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling over the roadways. The SCAQMD recommends that any Project over 5 acres should perform air quality dispersion modeling to assess impacts to nearby sensitive receptors. The Project site is located within Source Receptor Area (SRA) 24, Perris Valley. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. To identify impacts to sensitive receptors, the SCAQMD recommends addressing LSTs for construction and operational impacts (stationary sources only).

### Sensitive Receptors

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. The California Air Resources Board (CARB) has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The closest sensitive receptors are single-family residences adjoining to the west and northeast of the Project site.

### Construction LST

The SCAQMD's guidance on applying CalEEMod to LSTs specifies the number of acres a particular piece of equipment would likely disturb per day<sup>9</sup>. SCAQMD provides LST thresholds for 1-, 2- and 5-acre site disturbance areas. Based on information obtained from CalEEMod, the Project would disturb up to 5 acres per day. Therefore, LST thresholds for 5-acre sites were conservatively utilized for the construction LST analysis. Because the nearest sensitive receptors adjoin the Project site, the lowest available LST values for 25 meters were used.

**Table 7, Localized Emissions Significance**, shows the localized construction-related emissions for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> compared to the LSTs for SRA 24. It is noted that the localized emissions presented in **Table 7, Localized Emissions Significance**, are less than those in **Table 4** and **Table 5** above because localized emissions include only on-site emissions (e.g., from construction equipment and fugitive dust) and do not include off-site emissions (e.g., from worker trips and hauling activities). As shown in **Table 7**, the Project's localized construction emissions would not exceed the LSTs for SRA 24. Therefore, localized significance impacts from Project-related construction activities would be **less than significant**.

9 [https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=8c641d61\\_2](https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=8c641d61_2)

**Table 7: Localized Emissions Significance**

Maximum Emissions	Maximum Daily Emissions (pounds/day) <sup>4</sup>			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Year 1 <sup>1,3</sup>	29.2	30.1	9.14	5.14
Year 2 <sup>2,3</sup>	10.0	16.3	1.10	0.50
<b>Maximum Daily Emissions</b>	<b>29.2</b>	<b>30.1</b>	<b>9.14</b>	<b>5.14</b>
<i>LST Mass Rate Screening Criteria</i>	<i>270.0</i>	<i>1,577.0</i>	<i>13.0</i>	<i>8.0</i>
<b>Thresholds Exceeded?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

## Notes:

1. Maximum on-site daily emissions occur during grading phase for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> in Year 1.
2. Maximum on-site daily emissions occur during grading phase for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> in Year 2.
3. Modeling assumptions include compliance with SCAQMD Rule 403 which requires the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces two times daily; cover stockpiles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.
4. The Localized Significance Threshold Mass Rate Screening Criteria was determined using Appendix C of the SCAQMD Final Localized Significant Threshold Methodology guidance document for pollutants NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. The Localized Significance Threshold was based on the anticipated daily acreage disturbance for construction (approximately three acres; conservatively, the 5-acre threshold was used) and Source Receptor Area 24.

Source: Refer to Appendix A for assumptions used in this analysis.

**Operational LST**

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed Project if the Project includes stationary sources or attracts mobile sources that may spend extended periods queuing and idling at the site (e.g., industrial uses, warehouse, or transfer facilities). The Project does not propose or require uses that would constitute substantive stationary sources of emissions; or uses that attract mobile emissions sources that may spend long periods queuing and idling at the site. Accordingly, no operational-source emissions LST analysis is required.

**Carbon Monoxide Hotspots**

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (e.g., adversely affecting residents, school children, hospital patients, and the elderly).

The SCAB is designated as an attainment/maintenance area for the federal CO standards and an attainment area under state standards. CO emissions have declined even though vehicle miles traveled (VMT) on U.S. urban and rural roads have increased; estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions<sup>10</sup>. Three major control programs have contributed to the reduced per-vehicle CO emissions, including exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

According to the SCAQMD CEQA Air Quality Handbook, a potential CO hotspot may occur at any location where the background CO concentration already exceeds 9.0 parts per million (ppm), which is the 8-hour California Ambient Air Quality Standard (AAQS). As previously discussed, the site is located in SRA 24. Communities within SRAs are expected to have similar climatology and ambient air pollutant concentrations. The monitoring station representative of SRA 24 is the Riverside – Rubidoux station, which is located approximately 15.5 miles northwest of the site. The maximum CO

<sup>10</sup> U.S. Environmental Protection Agency, Carbon Monoxide Emissions  
[https://cfpub.epa.gov/roe/indicator\\_pdf.cfm?i=10](https://cfpub.epa.gov/roe/indicator_pdf.cfm?i=10), accessed March 24, 2025.

concentration at Riverside – Rubidoux station was measured at 0.731 ppm in February 2025.<sup>11</sup> Given that the background CO concentration does not currently exceed 9.0 ppm, a CO hotspot would not occur at the Project site. Therefore, CO hotspot impacts would be less than significant in this regard.

### Air Quality Health Impacts

As evaluated above, the Project’s air emissions would not exceed the SCAQMD’s LST thresholds, and CO hotspots would not occur as a result of the proposed Project. Therefore, the Project would not exceed the most stringent applicable federal or state ambient air quality standards for emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons (children and the elderly) are protected. In other words, the ambient air quality standards are purposefully set in a stringent manner to protect children, elderly, and those with existing respiratory problems. Thus, an air quality health impact would be less than significant in this regard.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed Project does not include any uses identified by the SCAQMD as being associated with odors.

Construction activities associated with the Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and would cease upon Project completion. In addition, the Project would be required to comply with the California Code of Regulations, Title 13, §2449(d)(3) and §2485, which minimizes the idling time of construction equipment either by requiring equipment to be shut off when not in use or limiting idling time to no more than 5 minutes. Compliance with these existing regulations would further reduce the detectable odors from heavy-duty equipment exhaust. The Project would also be required to comply with the SCAQMD Rule 1113 – Architectural Coating, which would minimize odor impacts from ROG emissions during architectural coating. Any odor impacts to existing adjacent land uses would be short-term and negligible. As such, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant in this regard.

### Technical Reports

1. Air Quality and Greenhouse Gas CalEEMod Summary Report, prepared by EPC Environmental, Inc., dated July 31, 2025, and provided as **Appendix A** of this IS/MND.

<sup>11</sup> California Air Resources Board, *AQMIS2: Air Quality Data*, <https://www.arb.ca.gov/aqmis2/aqdselect.php>, accessed June 15, 2025.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. Biological Resources – Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response:** The Project site is a relatively flat parcel with low to medium vegetation cover and the occasional dispersed tree. Three structures, an abandoned dwelling, barn and greenhouse were observed at the site with a partial chain-link fence along sections of the property. The 500-ft BSA buffer included Alessandro Blvd, Brodiaea Ave., existing residential development south and north of the property, and agricultural land to the east and west of the property. The Project has debris associated with the previous residence and farming activities.

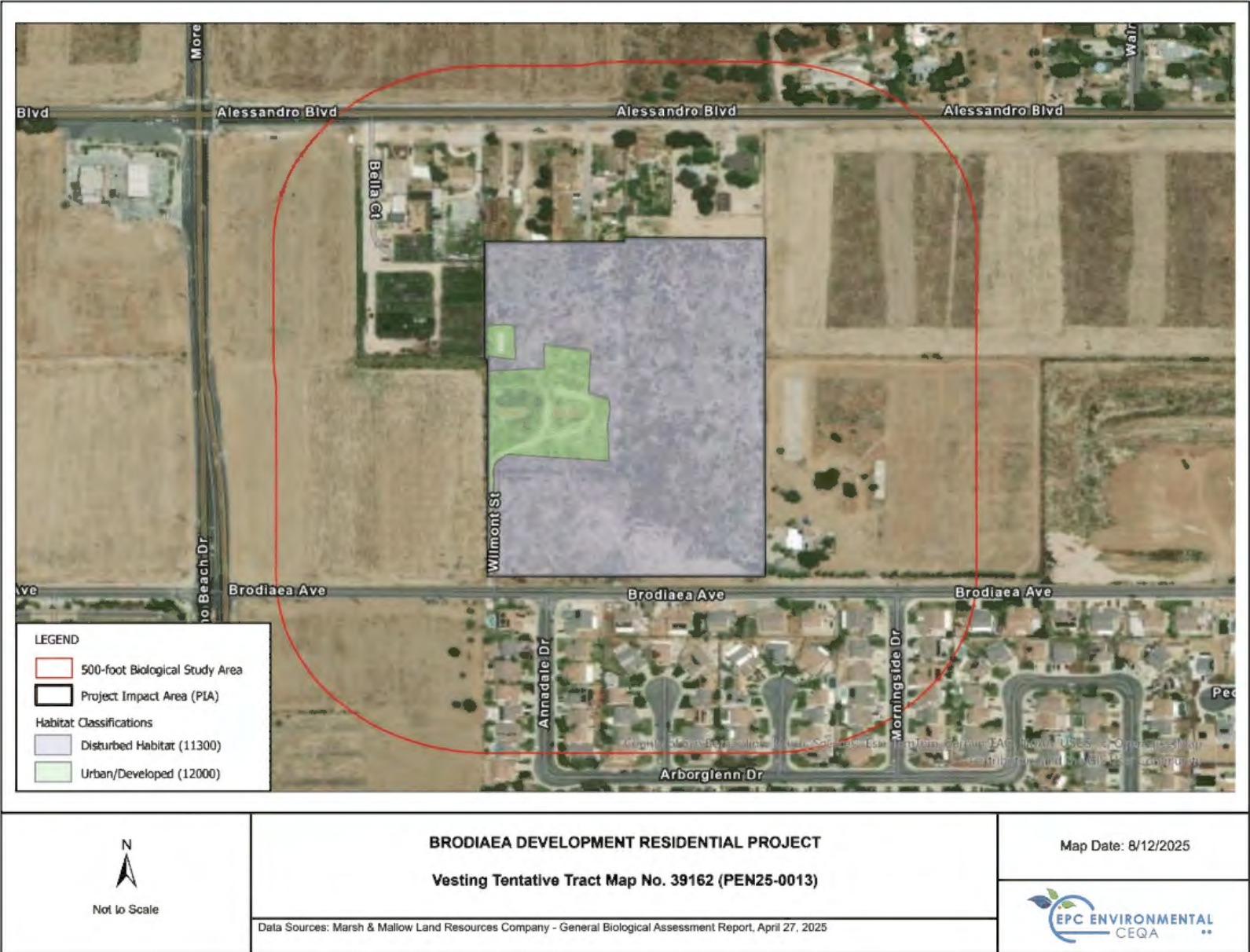
### Literature Review

A literature review was conducted by Darian Wong to identify previously reported special-status species and habitats within the Project area. The search included the 14.4-acre Project site as well as a 500-foot buffer area to identify biological resources that may be impacted indirectly by the Project. The following databases and sources were reviewed:

- California Department of Fish and Wildlife’s (CDFW) California Natural Diversity Database (CNDDDB) (2025)
- California Native Plant Society’s (CNPS) Inventory of Rare and Endangered Plants (2025)
- Calflora (2025)
- US Fish and Wildlife Service (USFWS) Threatened & Endangered Species Active Critical Habitat Report Online Mapper (2025)
- Regional Conservation Authority WRCMSCHP Interactive Map (2025)
- The University and Jepson Herbaria- Jepson eFlora (2025)
- USFWS National Wetlands Inventory (NWI) Wetlands Mapper (2025)
- US Department of Agriculture Natural Resources Conservation Service (NRCS) (2025) and National Hydric Soils List (2025)

This information was used in the field surveys.

**Figure 9. Habitat Classifications within Project Impact Area**



## Field Survey

A biological field survey was conducted by biologist Darian Wong on March 14, 2025. The survey consisted of meandering transects that covered the immediate project impact area (PIA) as well as the 500 ft. BSA to identify existing habitats onsite as well as record any plant and wildlife species observed. Habitat assessments were conducted for special-status species listed from the CNDDDB search that were determined to have potential to occur within the study area.

The results of literature review and the habitat assessment are summarized in **Table 8, Presence of Candidate, Sensitive, or Special Status Wildlife Species**, below.

**Table 8: Presence of Candidate, Sensitive, or Special Status Wildlife Species**

Species	Status	Presence/Absence
<b>Sensitive Plant Species</b>		
San Diego ambrosia	FE, CNPS 1B.1, WRMSHCP Species	<b>Unlikely:</b> The study area contains marginally suitable (low potential) disturbed habitat. There are no CNDDDB documented occurrences in the study area or vicinity.
San Jacinto valley crowscale	FE, CNPS 1B.1, WRMSHCP species	<b>Unlikely:</b> The study area contains marginally suitable (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are no CNDDDB documented occurrences in the study area or vicinity.
thread-leaved brodiaea	FE, SE, CNPS 1B.1, WRMSHCP Species	<b>Unlikely:</b> The study area contains marginally suitable (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are no CNDDDB documented occurrences in the study area or vicinity.
Plummer's mariposa lily	CNPS 4.2, WRMSHCP Species	<b>No Potential:</b> The study area contains marginally suitable (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are no CNDDDB
smooth tarplant	CNPS 1B.1, WRMSHCP Species	<b>No Potential:</b> The study area contains marginally suitable (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are no CNDDDB documented occurrences in the study area or vicinity.
Parry's spineflower	CNPS 1B.1, WRMSHCP Species	<b>Unlikely:</b> The study area contains marginally suitable (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are no CNDDDB documented occurrences in the study area or vicinity.
paniculate tarplant	CNPS 4.2	<b>Unlikely:</b> The study area contains marginally suitable (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are no CNDDDB documented occurrences in the study area or vicinity.
San Bernardino aster	CNPS 1B.2	<b>Unlikely:</b> The study area contains marginally suitable (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are no CNDDDB documented occurrence in the study area or vicinity.
<b>Reptiles</b>		
red-diamond rattlesnake	SSC, WRMSHCP Species	<b>Unlikely:</b> The study area contains marginally suitable (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are no CNDDDB documented occurrences in the study area or vicinity.

Species	Status	Presence/Absence
<b>Sensitive Plant Species</b>		
coast horned lizard	SSC, WRMSHCP Species	<b>Unlikely:</b> The study area contains marginally suitable (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are no CNDDDB documented occurrence in the study area or vicinity.
<b>Birds</b>		
burrowing owl	SCE, WRMSHCP Species	<b>Moderate Potential:</b> The study area contains marginally suitable habitat for this species. The project site and surrounding PIA can be classified as majority disturbed habitat with nonnative grasses, and invasive plants. Since burrowing owls are adapted to these conditions, the project site may provide habitat for this species. There are no CNDDDB documented occurrences in the study area or vicinity.
Ferruginous hawk		<b>Unlikely:</b> The study area contains marginally suitable foraging habitat (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are no CNDDDB documented occurrences in the study area or vicinity.
<b>Mammals</b>		
western mastiff bat	SSC	<b>Moderate Potential:</b> The study area contains marginally suitable (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are potential roost sites in large ornamental Eucalyptus or pine species surrounding the project site. There are no CNDDDB documented occurrences in the study area or vicinity.
western yellow bat	SSC	<b>Moderate Potential:</b> The study area contains marginally suitable (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are potential roost sites in large ornamental Eucalyptus or pine species surrounding the project site. There are no CNDDDB documented occurrences in the study area or vicinity.
American badger	SSC	<b>Unlikely:</b> The study area contains marginally suitable (low potential) disturbed habitats with the presence of low-lying grasses and shrubs. There are no CNDDDB documented occurrences in the study area or vicinity.
<p><b>Federal Status:</b> Federal Endangered (FE); Federal Threatened (FT); Federal Proposed (FP, FPE, FPT); Federal Candidate (FC), Federal Species of Concern (FSC);</p> <p><b>State Status:</b> State Endangered (SE); State Candidate Endangered (SCE); State Threatened (ST); Fully Protected (FP); State Rare (SR); State Species of Special Concern (SSC); California Native Plant Society (CNPS). Western Riverside County Multiple Species Habitat Conservation Plan {WRMSHCP} Species</p> <p><b>No Potential:</b> The area and its surroundings clearly lack the necessary conditions for the species to survive or thrive, including unsuitable foraging and breeding areas, vegetation, elevation, hydrology, substrate, and disturbance history.</p> <p><b>Unlikely:</b> Only a few elements of suitable habitat are present, and the majority of the site and nearby areas offer low-quality or inappropriate conditions. The species is not expected to occur in the area.</p> <p><b>Moderate Potential:</b> Some essential habitat features are available, although certain portions of the site or nearby environment may be unsuitable. There is a moderate chance the species could be present.</p> <p><b>High Potential:</b> Most or all of the critical habitat requirements are met on-site and/or in the surrounding areas, offering highly suitable conditions. The likelihood of the species being present is high.</p> <p><b>Present:</b> The species has been directly observed on-site or documented in recent reports or databases (e.g., CNDDDB) as occurring at the location.</p>		

The following species were identified as having a “Moderate Potential” to occur on the Project Site in the future and are further discussed below:

### **Burrowing Owl**

The burrowing owl (BUOW) is designated as a species of special concern by CDFW and is a fully covered species under the MSHCP. The species is typically found in grassland, shrub steppe, and desert habitat types; however, it can also be found in agricultural areas, ruderal fields, and pastures, as well as in urban environments such as vacant lots, flood control facilities, and open spaces. Burrowing owls require underground burrows or other cavities for nesting, roosting, and shelter. Burrows used by the owls are usually dug by other species such as California ground squirrel (*Spermophilus beecheyi*) and round-tailed ground squirrel (*Citellus tereticaudus*). As such, the presence of colonial mammal burrows is often an indication that burrowing owls may be present. Burrowing owls have also been found occupying man-made cavities, such as buried and non-functioning drainpipes, standpipes, and dry culverts.

Focused BUOW surveys were conducted in March, April, May, and June 2025 following the MSHCP survey protocol, Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan Area. No burrowing owls, sign (i.e., pellets, feathers, castings, or whitewash), occupied burrows, or remnant burrows were observed. However, the Project site is sparsely vegetated with a variety of low-growing plant species that allow for open line-of-sight and foraging opportunities for BUOW. In accordance with the Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area, if BUOW habitat occurs on-site, focused surveys and pre-construction clearance surveys are required.

The proposed Project would implement **Mitigation Measures BIO-1, Preconstruction Burrowing Owl Survey**, below to ensure potential impacts to burrowing owls are reduced to a less than significant level by requiring a pre-construction survey prior to ground-disturbing activities.

### **Mitigation Measures**

**MM BIO-1 Preconstruction Burrowing Owl Survey:** A CDFW protocol pre-construction burrowing owl survey will be completed by a qualified biologist within 30 days of construction start. If it is determined that burrowing owls are nesting or utilizing the site, work must cease and a burrowing owl plan consistent with CDFW’s Staff Report on Burrowing Owl Mitigation (CDFW 2012) will be prepared. The plan will identify burrowing owl habitat that is being disturbed, and avoidance measures including construction buffer. Consultation with CDFW will be required if relocation of any burrowing owl is necessary.

### **Western Mastiff Bat and Western Yellow Bat**

The Project site and buffer area offer potential foraging and roosting habitat for bats, which are found throughout Southern California and may use the area despite significant disturbance. No bats were observed during surveys, but their presence under similar conditions is documented. The proposed Project will implement **Mitigation Measures BIO-2, Pre-construction Bat Survey**, to ensure that potential impacts on bats are **less than significant**.

**MM BIO-2 Preconstruction Bat Survey:** Within 30 days prior to construction, a pre-construction survey must be completed by a qualified biologist to determine the presence of bats within and adjacent to the Project site. The focus of the surveys should be on the abandoned structures on site and surrounding trees. If any signs or individuals of special-status bats are identified, a bat management plan will be drafted that outlines additional surveys and additional measures to avoid impacting the special-status bat species.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** Database review indicated the presence of 1 sensitive natural community within the USDA *Sunnymead* Quadrangle; southern sycamore alder riparian woodland. This sensitive natural community is typically characterized by the presence of an intermittent water source or floodplain dominated by Western Sycamore (*Platanus racemosa*) and Alder (*Alnus* spp.). Both species do not occur onsite. Habitats mapped by the CNDDDB as this sensitive natural community are located further north within the *Sunnymead* Quadrangle. As such, there is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** Because the Project site and buffer area contain no aquatic resources, there is **no impact**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The Project site serves as low quality habitat for wildlife movement due to the high disturbance and human activity on and near the site. Three busy roadways exist to the south, east, and west, and residential development to the south and north which isolate the Project site from sensitive habitats. Through the database review of the California Department of Fish and Wildlife’s (CDFW) Areas of Conservation Emphasis’ (ACE) Terrestrial Connectivity dataset, the Project site was labeled in an area with limited connectivity opportunity or rank 1. This typically means that the location, as well as the surrounding 2.5 square miles, has more than 50% land cover determined to be urbanized or be utilized for agriculture. This area lacks channelized areas that prioritize species movements and lacks core natural areas. Additionally, the Project site does not occur within a mapped linkage area or wildlife corridor area within the WR-MSHCP. However, there is some shrubs and trees that could provide nesting opportunities for bird and **Mitigation Measure MM BIO-3, Preconstruction Nesting Bird Survey**, is required that potential impacts are less than significant.

**MM BIO-3 Preconstruction Nesting Bird Survey:** If work occurs within nesting bird season (February 1 to August 30), a qualified biologist will be required to conduct a preconstruction nesting bird survey within 7 days of construction. The survey will include the entire Project area and surrounding 500 feet. If any active nests are found, a construction buffer will be established, 300 feet for passerines and 500 feet for raptors and listed birds. A biologist will monitor the active nest once a week until nesting has ceased, or the fledglings have fledged.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The Moreno Valley Municipal Code addresses tree removal on all land uses, for all projects, in all districts requiring City approval. The Moreno Valley Municipal Code addresses requirements for preservation and protection of heritage trees within the City located on both private and public property. Under Title 9 Chapter 9.17 of the Moreno Valley Municipal Code, the City has identified two tree species as “heritage trees.” Based on the field surveys, no heritage trees were identified on the Project site. As such, no mitigation is required, and impacts would be **less than significant**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or another approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response:** The Project site is located within the boundaries of the MSHCP. According to the RCA’s online MSHCP Information Application, the Project site is not located within any Subunits, Criteria Cells, Conservation Areas, Cores/Linkages, or Public/Quasi-Public (P/QP) Lands identified by the MSHCP. However, the Project site is located within a designated survey area for BUOW and is subject to the procedures outlined in the Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area. In addition, the protection of species associated with riparian/riverine resources and vernal pools is also required by the MSHCP and is discussed below.

**Burrowing Owl**

The biological habitat assessment and preliminary jurisdictional delineation were conducted by MMLRC Biologist Darian Wong on March 14, 2025. Mr. Wong conducted meandering transects to identify habitats that exist within the Project site and to determine whether any special-status species listed in Table 3 of the Biological Resources Assessment Report would be impacted by the Project. Additionally, Mr. Wong recorded current site conditions through photographs and noted the location of sensitive biological resources with a Global Positioning System (GPS) unit. Table 1 of the Biological Resources Assessment Report notes the start and end times of the survey, and the weather conditions observed during the survey. In addition to the general habitat assessment survey, an additional survey was completed on April 12, 2025 to assess the presence of burrowing owl. No suitable burrows (characterized by a 4-inch or higher diameter opening, whitewash, owl pellets or

feathers) were observed during this focused burrow survey. Therefore, no additional assessments were necessary.

### **Riparian/Riverine Resources**

There are no riverine features within the BSA or the Project site, and no impact on any riverine feature or any protected wetlands as defined and regulated by Section 404 of the Clean Water Act would occur. Additionally, there is no sensitive riparian feature or natural community within the Project site.

### **Vernal Pools**

One of the factors for determining the presence of vernal pools would be demonstrable evidence of seasonal ponding in an area of topographic depression that is not subject to flowing waters. Prior to conducting the habitat assessment, a review of historical aerial photographs was conducted. In addition, a review of the USDA Custom Soil Resource Report for Western Riverside Area, California, was conducted to determine the soil associations within the Project site. The MSHCP lists two general classes of soils known to be associated with special-status plant species and presence of vernal pool habitat: clay soils and Traver-Domino Willow association soils. The specific clay soils known to be associated with special-status species/vernal pool habitat within the MSHCP Plan Area include Bosanko, Auld, Altamont, and Porterville series soils, whereas Traver-Domino Willows association includes saline-alkali soils largely located along floodplain areas of the San Jacinto River and the Salt Creek flood control channel.

Based on a review of the Custom Soil Resource Report for Western Riverside Area, California, none of the soil classes (e.g., Bosanko, Auld, Altamont, and Porterville series and Traver-Domino Willows association) known to be associated with vernal pool habitat occur within the Project site. The mapped soils throughout the Project site primarily consist of sandy loam textures and not the clay soil textures which are needed to form the impermeable restrictive duripan layer below the soils surface. Therefore, no direct or indirect impacts are expected to occur relative to vernal pools.

### **Conclusion**

With implementation of **MM BIO-1** through **MM BIO-2**, the Project would not conflict with the provisions of the MSHCP, and potential impacts would be reduced to a less than significant level.

### **Significance of Impact After Mitigation**

With implementation of **MM BIO-1** through **MM BIO-3**, as well as adherence to the standard conditions and requirements, the Project would comply with the requirements of the MSHCP, the MBTA, and the Moreno Valley Municipal Code. Compliance would reduce impacts to less than significant levels.

### **Technical Reports**

1. General Biological Resource Assessment and Preliminary Jurisdictional Delineation Report Warmington Residential Project (Habitat Assessment and MSHCP Consistency Analysis), prepared by Marsh and Mallow Land Resources Consulting (MMLRC), dated April 21, 2025, and as provided as **Appendix B** of this IS/MND.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. Cultural Resources – Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to <a href="#">§15064.5</a> ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** The Cultural Resources Assessment conducted for the proposed Project included an archaeological field survey, an archaeological sensitivity analysis, and a records search to identify previously recorded prehistoric and historic cultural resources and cultural resource surveys within a 0.5-mile radius of the Project area. The records search was conducted by the South Coastal Information Center (SCIC) of the California Historical Resources Information System at the repository located on the campus of San Diego State University.

### South Coastal Information Center Results

No cultural resources are located within the Project area. A total of 34 resources are documented within the 1-mile search radius, including 20 prehistoric sites consisting of bedrock milling features. The other 13 resources also include sites dated to the historical period and include buildings, structural remains, a grave, roads, and other infrastructure features. The nearest among these was a group of irrigation features found some 700 feet to the west of the Project site. Since none of these known cultural resources was located in the immediate vicinity of the Project area, none of them require further consideration. No resources were identified as part of these studies.

The records search results also indicated that the directories checked (including the National Register of Historic Places [NRHP], National Historic Landmarks [NHL], California Register of Historic Resources [CRHR], California Historical Landmarks [CHL] list, the California Points of Historical Interest [CPHI] list, and the California Built Environment Resource Directory [BERD] for Riverside County), showed that there were no listed properties within the Project area.

### Historical Research

The Project area was once part of two 10-acre parcels subdivided in 1890 by the Bear Valley and Alessandro Development Company, which was headed by Frank Brown, co-founder of the Redlands colony in San Bernardino County. By 1949, the property had obtained its current configuration and was owned by rancher Carlton Jackson.<sup>12</sup> After Jackson died that year, family member Addie C. Jackson, a housewife, evidently inherited the property. In the 1950s, the entire Project area was used as agricultural field. The residence was built between 1959 and 1962, followed by the barn between 1962 and 1966. The rest of the property continued to serve as farmland until the 1960s-1970s.

Addie Jackson remained the owner until 1967, when Melvin Franklin “Mel” Parks (1934-2009) and Frances Ann “Peggy” Parks (née Updike; 1937-2020) acquired the property. The Parkses added the greenhouse sometime between 1967 and 1978. They operated the Meltone Cactus Nursery on the property through at least 1999 while Melvin Parks, a former U.S. Army specialist who served in 1956-1958, also worked for some 20 years at the bakery of Sage’s market in Riverside. The second greenhouse, now in ruins, was added in 2002-2003.. Elsewhere on the property, the land was cleared regularly over the years, but there is no evidence that any large-scale farming continued into the 1980s. Between 1980 and 2009, a number of other buildings were also present around those recorded at Site 4216-1H, but all of them have since been removed, leaving most of the property vacant and largely unused.

<sup>12</sup> County Assessor 1946-1969; Ancestry.com n.d.

## Discussion

In summary of the research results outlined above, Site 4216-1H, consisting of three buildings that represent the remnants of a former farmstead and plant nursery dating to the 1950s-1970s era, is the only potential “historical resource” identified in the project area. Since none of the buildings has not been listed in the California Register of Historical Resources, formally determined eligible for such listing, or designated in an officially established local register, Site 4216-1H does not meet the definition of a “historical resource” in the categories of “mandatory” or “presumptive.” Therefore, it requires evaluation as a potential “discretionary historical resource.”

As discussed above, the establishment of the farmstead dates to the 1950s-1960s era, under the ownership of Addie C. Jackson, before Melvin and Frances Parks acquired the property in 1967 and turned it into a commercial plant nursery. The transformation of the property mirrored that of the Moreno Valley area from an agrarian community gradually to a suburban residential town during the mid- and late 20th century. While this modest farmstead is relatable to the theme, it does not demonstrate a particularly close or important association to this pattern of events in local and regional history, especially in comparison to the numerous other surviving properties of similar nature and vintage. Meanwhile, no specific events of recognized historic significance have been identified in association with the property.

Historical sources have yielded no evidence that the Jacksons, the Parkses, or any other persons associated with the property have attained a high level of historic significance, nor have any prominent architects, designers, or builders been identified in the construction of the buildings. In terms of architectural or artistic values, the buildings on the property are unremarkable products of common construction practice of their time, and none of them represents an important or notable example of any style, type, period, region, or method of construction, nor do they demonstrate any other special merit in design, construction, engineering, or aesthetics.

Lastly, the history of post-WWII rural development in the U.S. and subsequent suburban transformation of southern California is well documented in historical literature as well as contemporary accounts, leaving little potential for this property and the buildings it contains to yield any new or important data for the study of this subject. Based on these considerations, the former farmstead at 28136 Brodiaea Avenue does not appear to meet the any of the criteria for listing in the California Register of Historical Resources. Therefore, it does not qualify as a “historical resource” in the category of “discretionary historical resources.”

## Conclusion

Based on the SCIC records search, literature and historical map review, historical society consultation, NAHC Sacred Lands File search, and cultural resources field survey, no historical resources were identified as defined by CEQA §15064.5(a) within the Project site. The proposed Project will not cause a substantial adverse change to any known “historical resources.” Therefore, **no impact** relative to historical resources would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response.** As noted above, no archaeological resources were identified during the pedestrian survey of the Project area. The Project area consists of a vacant dirt lot. Soils consist of tan-colored sandy loam with 10 percent gravel inclusions at the surface. Observed vegetation throughout the

Project area included tobacco tree, sunflowers, datura, and silverleaf nightshade. Disturbances observed included dirt push piles, open pits, and gravel piles in the northern and eastern portions of the Project area.

The ground surface in the Project area has been extensively disturbed in the past due to agricultural uses, construction activities and, more recently, weed abatement by mechanical means, with little vestige of the natural landscape remaining today. Scattered refuse items, such as glass bottle fragments, a few steel cans, paper and plastic scraps, and building debris, were observed throughout the Project area, but all of them appeared to be modern in origin, and none of them is of any historical/archaeological interest. However, there is the possibility that during grading, subsurface archaeological resources may be discovered. Therefore, the following mitigation measures are required:

## **Mitigation**

**MM CR 1 Archaeological Monitoring.** Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all ground-disturbing activities on site. The Project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist, in consultation with the Consulting Tribe(s), including the contractor, and the City, shall develop a CRMP as defined in CR-3. The Project archeologist shall attend the pre-grading meeting with the City, the construction manager, and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The archaeological monitor shall have the authority to temporarily halt and redirect earthmoving activities in the affected area in the event that suspected archaeological resources are unearthed.

**MM CR 2 Cultural Resource Monitoring Plan (CRMP).** The Project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a CRMP in consultation pursuant to the definition in AB52 to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting Tribe is defined as a Tribe that initiated the AB52 tribal consultation process for the Project, has not opted out of the AB52 consultation process, and has completed AB52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include:

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

**MM CR 3 Grading Plan Note (Halt Work).** The City shall verify that the following note is included on the Grading Plan:

“If any suspected archaeological and cultural 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 CR 4**     **Inadvertent Finds.** If potential historic or cultural resources are uncovered during excavation or construction activities at the Project Site that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval;

1. All ground-disturbing activities in the affected area within 100 feet of the uncovered resource must cease immediately until a meeting is convened between the developer, project archeologist who is 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.
2. The developer shall call the City or their designee immediately upon discovery of the cultural resource to convene the meeting.
3. At the meeting with the aforementioned parties, the significance of the discoveries shall be discussed and as appropriate recommend alternative measures to avoid, minimize or mitigate negative effects on the historic, or prehistoric resource.
4. Further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional archeologists and Tribal Monitors, if needed.
5. Determinations and recommendations by the consultant shall be immediately submitted to the Planning Division for consideration and implemented as deemed appropriate by the Community Development Director, in consultation with the State Historic Preservation Officer (SHPO) and any and all Consulting Native American Tribes as defined in CR 2 before any further work commences in the affected area.
6. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.

**MM CR 5**     **Human Remains.** If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the "most likely descendant". The "most likely descendant" shall then make recommendations and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective 23.3, CEQA). **No photographs are to be taken except by the coroner, with written approval by the consulting Tribe(s).**

**MM CR 6**     **Archaeology Report - Phase III and IV.** Prior to final inspection, the developer/permit holder shall prompt the Project Archaeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the

construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the South Coastal Information Center (SCIC) at the San Diego State University (SDSU), and one (1) copy shall be submitted to each of the Consulting Tribe(s) Cultural Resources Department(s).

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of formally dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** No conditions exist that suggest human remains are likely to be found on the Project site. However, construction activities, particularly grading, could potentially disturb human remains interred outside of a formal cemetery. Health and Safety Code §7050.5 describes the requirements if any human remains are discovered during excavation of a site. As required by state law, the requirements and procedures set forth in §5097.98 of the California Public Resources Code shall be implemented, including notification of the County Coroner, notification of the Native American Heritage Commission, and consultation with the individual identified by the Native American Heritage Commission to be the “most likely descendant.” If human remains are found during excavation, excavation shall stop in the vicinity of the find and any area that is reasonably suspected to overlie adjacent remains until the County Coroner has been called out, and the remains have been investigated and appropriate recommendations have been made for the treatment and disposition of the remains.

**Mitigation Measures**

None required.

**Technical Reports**

1. Cultural Resources Survey Report for the APN 478-070-013 to -015, and 478-080-003 to -005, located at 28136 Brodiaea Avenue, City of Moreno Valley, Riverside County, California (Cultural Resources Assessment) prepared by CRM TECH, dated March 15, 2025, and provided as **Appendix C** of this IS/MND

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. Energy – Would the project:</b>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:**

**CEQA Guidelines Appendix F**

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a Project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis on Response 4.6(a) relies on Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- Criterion 1: The Project energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
- Criterion 2: The effects of the Project on local and regional energy supplies and on requirements for additional capacity.
- Criterion 3: The effects of the Project on peak and base period demands for electricity and other forms of energy.
- Criterion 4: The degree to which the Project complies with existing energy standards.
- Criterion 5: The effects of the Project on energy resources.
- Criterion 6: The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the Project's energy usage is presented and addresses Criterion 1. The discussion on construction-related energy use focuses on Criteria 2, 4, and 5. The discussion on operational energy use is divided into transportation energy demand and building energy demand. The transportation energy demand analysis discusses Criteria 2, 4, and 6, and the building energy demand analysis discusses Criteria 2, 3, 4, and 5.

### **Project-Related Sources of Energy Consumption**

This analysis focuses on three sources of energy that are relevant to the proposed Project: electricity, natural gas, and transportation fuel for vehicle trips and off-road equipment associated with Project construction and operations. The analysis of the operational electricity/natural gas usage is based on the California Emissions Estimator Model version 2022.1.1.29 (CalEEMod) modeling results for the Project. The Project's estimated electricity consumption is based primarily on CalEEMod's default settings for Riverside County, and consumption factors provided by Moreno Valley Utility, the electricity provider for the City and the Project site. The results of the CalEEMod modeling are included in **Appendix A, Air Quality and Greenhouse Gas CalEEMod Summary Report**. The amount of operational fuel consumption was estimated using the California Air Resources Board's (CARB) Emission FACtor 2021 (EMFAC2021) computer program, which provides projections for typical daily fuel usage in Riverside County, and the Project's annual vehicle miles traveled (VMT) outputs from CalEEMod. The estimated construction fuel consumption is based on EMFAC2021 model and the Project's construction equipment list, timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips.

As shown in **Table 9, Project and Countywide Energy Consumption**, the Project's energy usage would constitute an approximate 0.018 percent increase over Riverside County's typical annual electricity consumption. The Project's construction and operational vehicle fuel consumption would increase Riverside County's consumption by 0.148 percent and 0.019 percent, respectively (**Criterion 1**).

**Table 9: Project and Countywide Energy Consumption**

Energy Type	Project Annual Energy Consumption <sup>1</sup>	Riverside County Annual Energy Consumption <sup>2</sup>	Percentage Increase Countywide <sup>2</sup>
Electricity Consumption	1,256 MWh	9,060,000 MWh	0.018%
Fuel Consumption			
Construction Fuel Consumption <sup>3</sup>	54,325 gallons	36,798,212 gallons	0.148%
Operational Automotive Fuel Consumption <sup>3</sup>	135,780 gallons	710,266,011 gallons	0.019%

## Notes:

1. As modeled in CalEEMod version 2022.1.1.29.
2. The Project increases in electricity consumption are compared to the total consumption in Riverside County in 2021. The Project increases in construction and automotive fuel consumption are compared with the projected Countywide fuel consumption in 2023 and 2025, respectively. Riverside County residential electricity consumption data source: California Energy Commission, Electricity Consumption by County, [https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0\\_](https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0_) accessed June 16, 2025.
3. Project construction fuel consumption calculated based on CalEEMod equipment number, type, and hours. Refer to Appendix 1 for assumptions used in this analysis.

**Construction-Related Energy Consumption**

During construction, the Project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during grading, paving, building construction, and architectural coatings. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. In addition, some incidental energy conservation would occur during construction through compliance with state requirements that heavy-diesel equipment not in use for more than 5 minutes be turned off. Project construction equipment would also be required to comply with latest U.S. Environmental Protection Agency (EPA) and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. Due to increasing transportation costs and fuel prices, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (**Criterion 4**).

Substantial reduction in energy inputs for construction materials can be achieved by selecting green building materials composed of recycled materials that require less energy to produce than non-recycled materials. The integration of green building materials can help reduce environmental impacts associated with the extraction, transport, processing, fabrication, installation, reuse, recycling, and disposal of these building industry source materials.<sup>13</sup> The Project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials. As indicated in **Table 9, Project and Countywide Energy Consumption**, the Project's fuel consumption from construction would be approximately 54,325 gallons, which would increase construction off-road fuel use in the County by approximately 0.148 percent. As such, construction would have a nominal effect on the local and regional energy supplies (**Criterion 2**). It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual Project characteristics that would necessitate the use of construction equipment that would

13 California Department of Resources Recycling and Recovery, Green Building Materials, <https://calrecycle.ca.gov/greenbuilding/>, accessed March 15, 2025.

be less energy efficient than at comparable construction sites in the region or the state (**Criterion 5**). Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development Projects of this nature. As such, a less than significant impact would occur in this regard.

**Table 10, Construction Equipment Fuel Demand**, presents the Project’s estimated construction equipment fuel demand calculations based on the CalEEMod default equipment and schedule. The Horsepower hours per day (HP hrs/day) was calculated by taking the number of equipment times the operating hours per day, times the horsepower, times the load factor. The HP hrs/day was then multiplied by the number of days for the phase and divided by 18.5 to estimate the total fuel demand. The 18.5 value is the estimated fuel consumption rate from the California Air Resources Board (CARB), *The Carl Moyer Program Guidelines, 2017 Revisions, Appendix D, Table D-21 Fuel Consumption Rate Factors*, for engines of less than 750 HP<sup>14</sup>. As indicated in Table 10, Construction Equipment Fuel Demand, the total construction equipment fuel demand is estimated to be 54,325 gallons of diesel fuel.

**Table 10: Construction Equipment Fuel Demand**

Construction Phase	Offroad Equipment Type	Number/Day	Hours/Day	Horse Power	Load Factor	HP hrs./Day	Number of Days	Total Fuel Demand (gal diesel fuel)
Demolition	Rubber Tired Dozers	2	8	367	0.40	2,349	20	2,239
	Excavators	3	8	36	0.38	328	20	355
	Concrete/Industrial Saws	1	8	33	0.73	193	20	209
Site Preparation	Tractors/Loaders/Bac khoes	4	8	84	0.37	995	10	538
	Rubber Tired Dozers	3	8	367	0.40	3,523	10	1,904
Grading	Graders	1	8	148	0.41	485	30	786
	Excavators	2	8	36	0.38	219	30	355
	Rubber Tired Dozers	1	8	367	0.40	1,174	30	1,904
	Tractors/Loaders/Bac khoes	2	8	84	0.37	497	30	806
	Scrapers	2	8	423	0.48	3,249	30	5,269
Building Construction	Cranes	1	7	367	0.29	745	300	12,081
	Forklifts	3	8	82	0.20	394	300	6,389
	Tractors/Loaders/Bac khoes	3	7	84	0.37	653	300	10,589
	Generator Set	1	8	14	0.74	83	300	1,346
	Welder	3	8	46	0.45	497	300	8,059
Paving	Pavers	2	8	81	0.42	544	20	588
	Paving Equipment	2	8	89	0.36	513	20	555
	Rollers	2	8	36	0.38	219	20	237
Architectural Coating	Air Compressors	1	6	37	0.48	107	20	116
<b>Total Construction Equipment Fuel Demand</b>								<b>54,325</b>

## Operational Energy Consumption

### Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each

<sup>14</sup> Carl Moyer Program Guidelines accessed: [https://ww2.arb.ca.gov/sites/default/files/2020-06/2017\\_cmpgl.pdf](https://ww2.arb.ca.gov/sites/default/files/2020-06/2017_cmpgl.pdf).

individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States.<sup>15</sup> Based on the Brodiaea Avenue Vehicle Miles Traveled (VMT) Analysis, (Traffic Analysis) developed by TJW Engineering, Inc., dated March 5, 2025, (**Appendix J**) the proposed Project results in approximately 30.99 VMT per resident in the base year 2018 and 27.44 VMT per resident in the plan year 2045. Based on the thresholds identified, the proposed Project would result in approximately 24.7% fewer VMT in the 2045 plan year than the Moreno Valley VMT Per Capita thresholds. The Project does not propose any unusual features that would result in excessive long-term operational fuel consumption (**Criterion 2**).

The key drivers of transportation-related fuel consumption are job locations/commuting distance and many personal choices on when and where to drive for various purposes. Those factors are outside the scope of the design of the proposed Project. However, the Project would be located within one-half mile of an existing bus stop, and provide bicycle parking spaces on-site, which would promote alternative modes of transportation (Criterion 4 and Criterion 6).

Annual vehicular trips and related Vehicle Miles Traveled (VMT) generated by the operation of the Project as reported in CalEEMod are 4,069,313 miles per year and the EPA's Automotive Trends Report the average MPG is 27.97 and would result in an increased fuel demand of 135,780 gallons of fuel. Trip generation and VMT generated by the Project are consistent with other industrial uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (11<sup>th</sup> Ed., 2021) and CalEEMod. As such, Project operations would not result in excessive and wasteful vehicle trips and VMT, nor excess and wasteful vehicle energy consumption compared to other industrial uses.

It should be noted that the state strategy for the transportation sector for medium and heavy-duty trucks is focused on making trucks more efficient and expediting truck turnover rather than reducing VMT from trucks. This is in contrast to the passenger vehicle component of the transportation sector where both per-capita VMT reductions and an increase in vehicle efficiency are forecasted to be needed to achieve the overall state emissions reductions goals.

The proposed Project would implement Project design features consistent with residential uses. Enhanced fuel economies realized pursuant to federal and state regulatory actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells), likely would decrease future gasoline fuel demands per VMT. Location of the Project site proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. In compliance with the California Green Building Standards Code and County requirements, the Project would promote the use of bicycles as an alternative means of transportation by providing short-term and/or long-term bicycle parking accommodations. As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Therefore, fuel consumption associated with vehicle trips generated by the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. A less than significant impact would occur in this regard.

### **Building Energy Demand**

The CEC developed 2020 to 2035 forecasts for energy consumption and peak demand in support of the 2021 IEPR for each of the major electricity and natural gas planning areas and the state based on the economic and demographic growth projections, CEC forecasts that the statewide annual average growth rates of energy demand between 2021 and 2030 would be 1.3 percent to 2.3 percent

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15 U.S. EPA Automotive Trends Report retrieved from <https://www.epa.gov/automotive-trends/explore-automotive-trends-data#SummaryData>

for electricity.<sup>16</sup> As shown in **Table 9, Project and Countywide Energy Consumption**, operational energy consumption of the Project would represent approximately 0.018 percent increase in electricity consumption over the current countywide usage, which would be significantly below CEC’s forecasts and the current Countywide usage. Therefore, the Project would be consistent with the CEC’s energy consumption forecasts. As such, the Project would not require additional energy capacity or supplies (**Criterion 2**). Additionally, the proposed Project would be a residential development, and the energy consumption would peak in the evening, similar to other residential developments. As a result, the Project would not result in unique or more intensive peak or base period electricity demand (**Criterion 3**).

The proposed residential building would be required to comply with 2022 Title 24 Building Energy Efficiency Standards, which provides minimum efficiency standards related to various building features, including appliances, space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the 2022 Title 24 standards significantly reduces energy usage. The Title 24 Building Energy Efficiency Standards are updated every three years and become more stringent between each update, as such, complying with the latest 2022 Title 24 standards would make the proposed Project more energy efficient than existing buildings built under the earlier versions of the Title 24 standards. In addition, the Project would use energy efficient appliances, which have been accounted for in **Table 9, Project and Countywide Energy Consumption, (Criterion 4)**.

Furthermore, the electricity provider, Moreno Valley Utility, is subject to California’s Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 to 60 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that new development Projects will not result in the waste of the finite energy resources (**Criterion 5**).

Therefore, the Project would not cause wasteful, inefficient, and unnecessary consumption of building energy during Project operation, or preempt future energy development or future energy conservation. A less than significant impact would occur in this regard.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The proposed Project’s consistency with the applicable measures in the City’s General Plan for a new single-family home development are shown in **Table 11, Project Consistency with General Plan Energy Policies**. Furthermore, the Project would be required to comply with 2022 Title 24 standards and 2022 CALGreen Code. Therefore, by complying with General Plan goals and policies, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts will be less than significant.

<sup>16</sup> California Energy Commission, Final 2021 Integrated Energy Policy Report Volume IV California Energy Demand Forecast, February 2022,

**Table 11: Project Consistency with General Plan Energy Policies**

Goals and Policies	Project Consistency Analysis
<b>Goal OSRC-3: Use energy and water wisely and promote reduced consumption.</b>	
OSRC 3.1: Promote energy conservation throughout the community and encourage the use of renewable energy systems and technologies to supplement or replace traditional building energy systems.	<b>Consistent.</b> The Project would be required to comply with 2022 Title 24 standards and 2022 CALGreen Code. Further, in compliance with CALGreen Code, all single-family residential units of the Project would install solar ready roofs and be electric vehicle (EV) charging capable by including a listed raceway within each dwelling unit to accommodate EV charging stations. As such, the Project would be consistent with this measure.
OSRC 3.5: Promote the retention and reuse of rainwater onsite and promote the use of rain barrels or other rainwater reuse systems throughout the community.	<b>Consistent.</b> The Project would provide a water detention basin and storm drainage system in the southwestern portion of the site, which would provide rainwater retention. As such, the Project would be consistent with this measure.
OSRC 3.6: Encourage new development to incorporate as many water-wise practices as feasible in their design and construction.	<b>Consistent.</b> As previously stated, the Project would install low-flow water features, water-efficient irrigation, and drought-tolerant landscaping. As such, the Project would the retain and reuse of rainwater throughout the community and would be consistent with this measure.
OSRC 3.8: Conserve water through the planting and maintenance of trees, which will provide for the capture of precipitation and runoff to recharge groundwater, in addition to providing shading for other landscaping to reduce irrigation requirements. Ensure that any 'community greening' Projects utilize water-efficient landscape.	<b>Consistent.</b> The Project would provide approximately 1.08 acres of open space and parkland, 0.26 acres of landscaped areas, and 0.35 acre water detention basin and storm drainage system in the southwestern portion of the site. As a result, the Project would conserve water through the planting and maintenance of trees, which will help in the capture of precipitation and runoff to recharge groundwater. Furthermore, the Project would use water efficient irrigation, and drought-tolerant landscaping. As such, the Project would be consistent with this measure.

Source: The City of Moreno Valley, General Plan 2040, June 15, 2021.

**Mitigation Measures**

None required.

**Technical Report**

1. Air Quality and Greenhouse Gas CalEEMod Summary Report, prepared by EPC Environmental, Inc., dated July 31, 2025, and provided as **Appendix A** of this IS/MND.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. Geology and Soils – Would the project:</b>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to <a href="https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf">https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf</a>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** According to the Geotechnical Investigation conducted by Alta Geotechnical Inc., (**Appendix E**), the Project site is not located in an Earthquake Fault Zone as mapped by the California Geological Survey.<sup>17</sup> As such, the development of the Project site with residential structures would not directly place people on a earthquake fault zone and exposing them to the risk of loss, injury or death. There is **no impact** in this regard.

However, the closest mapped active fault that could affect the Project site is the Claremont Fault located within the San Jacinto fault zone, which is located approximately 2.8 miles to the northeast. This issue is discussed under Impact VII.a) i) below.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The Project site is located in seismically active Southern California with numerous fault systems in the region. As such, it should be anticipated that the Project site will experience moderate to strong ground shaking in the near future. However, as a condition of issuance of grading and building permits, the Project would be required to comply with current CBC seismic design parameters and all other recommendations as contained in the Geotechnical Evaluation. Compliance with these parameters would require proposed residential homes to be designed and constructed to withstand expected seismic activity and associated potential hazards, thereby minimizing risk to the public and property. The Project would be designed and developed consistent with the CBC and standard engineering practices and reviewed in conjunction with the City Engineer. Therefore, the impacts would be **less than significant**.

17 California Geological Survey *Earthquake Zones of Required Investigation* interactive web map; accessed March 28, 2025; <https://maps.conservation.ca.gov/cgs/EQZApp/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:**

**Liquefaction**

Liquefaction is the loss of soil strength or stiffness due to a buildup of pore-water pressure during severe ground shaking. Liquefaction is associated primarily with loose (low density), saturated, fine-to-medium grained, cohesionless soils. As the shaking action of an earthquake progresses, the soil grains are rearranged, and the soil densifies within a short period of time. Rapid densification of the soil results in a buildup of pore-water pressure. When the pore-water pressure approaches the total overburden pressure, the soil reduces greatly in strength and temporarily behaves similarly to a fluid. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations.

Groundwater was not encountered within the exploratory borings performed for the Geotechnical Evaluation at a depth of 51.5 feet below ground surface (bgs). According to published groundwater studies encompassing the Project site area, the depth to groundwater beneath the site in circa 1971 was approximately 190 feet bgs. Based on state-provided information, groundwater elevation data from the nearest groundwater site located approximately 0.8 miles to the southwest indicate groundwater was as shallow as 99.8 feet below the ground surface in 1952. The most recent groundwater elevation data from the same monitoring site, recorded in 1986, indicates the most recent reading showed groundwater as shallow as 134.6 feet below the ground surface.

Based on the Geotechnical Evaluation, the site's near surface soils consist of silty sand of low plasticity. The southern areas of the site correspond to mapped areas of Quaternary Young Alluvial Fan deposits. This unit is defined as having a moderate susceptibility to liquefaction. These younger alluvial fan deposits are underlain by Pleistocene age very old fan deposits that are generally not susceptible to liquefaction. Given an absence of groundwater encountered beneath the site at or above a depth of 50 feet bgs, the potential constraint to the proposed development due to liquefaction and related seismic-induced settlement is considered very low. In addition, the Riverside County Map, My County interactive mapping website has mapped portions of the site as having a low liquefaction potential and portions of the site as having a moderate liquefaction potential. The State of California has not prepared liquefaction hazard maps for this area.

During a strong seismic event, and in the absence of groundwater, seismically induced settlement can still occur within loose to medium dense and dry or moist granular soils. Settlement caused by ground shaking is often non-uniformly distributed, which can result in differential settlement. Based on the design earthquake and a Peak Ground Acceleration (PGA) of 0.89 g, the magnitude of dynamic dry settlement is estimated to be on the order of approximately 4.0 inches, assuming remedial grading is performed in compliance with the Geotechnical Evaluation. Given the similar lithology of the onsite soil units and implementation of proposed remedial grading, anticipated dynamic settlement is expected to occur over a widespread area of the site. As such, the differential settlement is not expected to exceed 1-inch in a 30-foot horizontal distance.

Therefore, impacts relative to seismic-related ground failure including liquefaction would be **less than significant**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** The proposed Project is not expected to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death from landslides. Although the Project site is in an area of high seismic activity, because of the relatively flat terrain on the site and the surrounding properties, the site is at little risk for landslides. **No impact** would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Proposed construction activities would include clearing the site of debris and/or vegetation, soil excavation, grading, asphalt paving, residential home building construction, and landscaping. Such activities would disturb site soils, exposing them to the erosive effects of wind and water. However, all construction activities related to the proposed Project would be subject to implementation of BMPs for erosion control, as required under National Pollutant Discharge Elimination System (NPDES) regulations pursuant to the federal Clean Water Act. NPDES requirements for construction Projects of 1 acre or more in area are set forth in the Construction General Permit issued by the State Water Resources Control Board (State Water Board Order No. 2009-0009-DWQ). Furthermore, the Project's land clearing, grading, and construction activities would be required to comply with SCAQMD Rules 403 and 403.2 regulating fugitive dust emissions, thus minimizing wind erosion from such ground-disturbing activities. Therefore, the proposed Project would not generate substantial erosion. Soil erosion impacts would be **less than significant**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Refer to Discussion VII.a) iii) and VII.a) iv), above. Based on the low liquefaction and landslide potential, depth to groundwater, and flat topography, the Project site is not considered to be located on a geologic unit or soil that is unstable or could become unstable as a result of the Project. A **less than significant** impact would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Expansion Index (EI) testing was performed on representative samples collected from the Project site and has indicated that the site near surface soils consist of silty sand of low plasticity and are expected to possess very low expansion potential (EI<21). The expansion potential of the very old alluvial fan deposits may be higher where containing locally greater concentrations of clay (EI<51). The Geotechnical Evaluation recommended that foundation elements for the proposed residential homes be composed of entirely engineered fill soils and should be designed in accordance with the CBC. Therefore, with the Project conditioned to adhere to this recommendation, impacts in regard to expansive soils would be reduced to less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** The proposed Project would be served by the municipal sewer system of the Eastern Municipal Water District (EMWD) and would therefore have no need for a septic system or other alternative wastewater disposal system. There would be no impact.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response:** According to the CRM TECH Paleontological Resources Assessment, dated March 16, 2025 (**Appendix D**) potentially fossil-bearing units are present in the Project area and the Project area has a high potential to disturb paleontological resources within undisturbed bedrock.

Under these conditions, CRM TECH further recommends that the proposed Project may be cleared to proceed in compliance with CEQA provisions on paleontological resources.

As such, paleontological monitoring would be required during ground disturbing activities, as described in **MM GEO-1**. With implementation of **MM GEO-1**, potential impacts to undiscovered paleontological resources would be reduced to a **less than significant** level.

### Mitigation Measures

**MM GEO-1 Paleontological Monitoring.** In accordance with the provisions of CEQA as well as the proposed guidelines of the Society of Vertebrate Paleontology (2010), including but not be limited to the following components:

- Earth-moving operations within the Project area should be monitored periodically, or “spot-checked,” by the qualified paleontological monitor to ensure the timely

identification of previously undisturbed, potentially fossiliferous sediments when they are encountered. Once the depth of three feet is reached, or if potentially fossiliferous sediments are exposed sooner, all further earth-moving operations will need to be monitored continuously. The monitor should be prepared to quickly salvage fossil remains as they are unearthed to avoid construction delays. However, the monitor must have the power to temporarily halt or divert grading equipment to allow for the removal of abundant or large specimens.

- Samples of potentially fossiliferous sediments should be collected and processed to look for and recover small fossils that may be present.
- All recovered paleontological specimens should be identified to the lowest taxon possible and curated at a repository with permanent retrievable storage.
- A report of findings, including an itemized inventory of any recovered specimens, should be prepared upon completion of the procedures outlined above. The report should include a discussion of the significance of the paleontological findings, if any. The report and the inventory, when approved by the City of Moreno Valley, will signify completion of the mitigation program.

**Significance of Impact After Mitigation**

With implementation of **MM GEO-1**, as well as adherence to the standard conditions and requirements, potential impacts regarding geology and soils (paleontological resources) would be reduced to a less than significant level.

**Technical Reports**

1. Geotechnical Investigation, prepared by Alta California Geotechnical, Inc, dated October 14, 2022, and provided as **Appendix E** of this IS/MND

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. Greenhouse Gas Emissions – Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Project-related greenhouse gas (GHG) emissions include emissions from direct and indirect sources. Project implementation would result in direct and indirect emissions of CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub>, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct Project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from energy consumption, water demand, and solid waste generation. The California Emissions Estimator Model (CalEEMod), version 2020.4.0, was used to calculate direct and indirect Project-related GHG emissions. The Project proposes to construct a 134-unit single- family housing development with park use. Based on the City’s average household size of 3.68, the 134 units would introduce up to 493 additional residents within the City. **Table 12, Estimated Greenhouse Gas Emissions**, presents the estimated CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub> emissions associated with the proposed Project. Refer to **Appendix A, Air Quality and Greenhouse Gas CalEEMod Summary Report**.

**Table 12: Estimated Greenhouse Gas Emissions**

Source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total Metric Tons of CO <sub>2</sub> e <sup>2</sup> /year (1)
	Metric tons/year	Metric tons/year	Metric tons/year	
<b>Direct Emissions</b>				
Construction (amortized over 30 years)	21.30	<0.01	<0.01	21.53
Area Source <sup>2</sup>	2.30	<0.005	<0.005	2.31
Mobile Source <sup>3</sup>	1,435	0.06	0.07	1,460
Refrigerants				0.31
<b>Total Direct Emissions</b>	<b>1,458.6</b>	<b>0.075</b>	<b>0.085</b>	<b>1,484.15</b>
<b>Indirect Emissions</b>				
Energy Consumption <sup>4</sup>	257	0.02	<0.005	258
Solid Waste <sup>5</sup>	11.0	1.09	0.00	38.3
Water Demand <sup>6</sup>	10.7	0.18	<0.005	16.5
<b>Total Indirect Emissions</b>	<b>278.7</b>	<b>1.29</b>	<b>0.01</b>	<b>312.8</b>
<b>Total Project-Related Emissions</b>	<b>1,796.95 MTCO<sub>2</sub>e/year</b>			
<b>Total Project-Related Emissions per capita</b>	<b>3.64 MTCO<sub>2</sub>e/year per capita</b>			
<b>Moreno Valley CAP 2040 CAP Target</b>	<b>4.0 MTCO<sub>2</sub>e/year per capita</b>			
<b>Exceeds Threshold?</b>	<b>NO</b>			

Notes:

- 1 Carbon dioxide equivalent = CO<sub>2</sub>e; metric tons of carbon dioxide equivalent per year = MTCO<sub>2</sub>e per year.
- 2 Area Source. Project-related area sources include exhaust emissions from landscape maintenance equipment. The Project would use all electric landscape equipment.
- 3 Mobile Source. Based on Moreno Valley TTM 39162 Residential Traffic Impact Analysis (Transportation Analysis) developed by TJW Engineering, Inc., dated February 27, 2025, the proposed Project would generate approximately 94 AM peak hour trips, 126 PM peak hour trips, and 1,264 average daily trips. The CalEEMod program calculated annual VMT for the Project at 4,069,313 VMT/year.
- 4 Energy Consumption. SCE would provide electricity to the Project site. The Project proposes to install high efficiency lighting and energy efficient appliances.
- 5 Water Demand. The Project would install low-flow water fixtures and utilize water-efficient irrigation systems and draught-tolerant landscaping.
- 6 Solid Waste. Solid waste is subject to source reduction and recycling requirements.

**Total Project-Related Sources of Greenhouse Gases**

The total amount of Project-related GHG emissions from direct and indirect sources combined would total 1,796.95 MTCO<sub>2</sub>e per year. Because the Project would introduce up to 493 additional residents within the City,<sup>18</sup> the Project would generate approximately 3.64 MTCO<sub>2</sub>e per year per capita and would not exceed the per capita target for 2040 of 4.0 MTCO<sub>2</sub>e per year per capita.

18 State of California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2021-2025 with 2020 Census Benchmark, May 2022, <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/>, accessed May 15, 2025.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The GHG plan consistency for the Project is based on the Project’s consistency with the CARB 2022 Scoping Plan, the SCAG 2020-2045 RTP/SCS, and the City’s CAP. The 2022 Scoping Plan identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Actions that reduce GHG emissions are identified for each AB 32 inventory sector. The SCAG 2020-2045 RTP/SCS includes strategies for the region to reach the regional target of reducing GHG from transportation sector. The City’s CAP contains goals and policies that would help implement energy efficient measures and would subsequently reduce GHG emissions within the City.

**Consistency with 2020-2045 RTP/SCS**

On September 3, 2020, the Regional Council of SCAG formally adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS includes performance goals that were adopted to help focus future investments on the best-performing Projects, as well as different strategies to preserve, maintain, and optimize the performance of the existing transportation system. The SCAG 2020- 2045 RTP/SCS is forecasted to help California reach its GHG reduction goals by reducing GHG emissions from passenger cars by eight percent below 2005 levels by 2020 and 19 percent by 2035 in accordance with the most recent CARB targets adopted in March 2018. Five key SCS strategies are included in the 2020-2045 RTP/SCS to help the region meet its regional VMT and GHG reduction goals, as required by the state. **Table 13, Project Consistency with 2020-2045 RTP/SCS**, shows the Project’s consistency with the five key SCS strategies found within the 2020-2045 RTP/SCS that help the region meet its regional VMT and GHG reduction goals, as required by the state. As shown therein, the proposed Project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

**Table 13: Project Consistency with 2020-2045 RTP/SCS**

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
<b>Focus Growth Near Destinations and Mobility Options</b>		
<ul style="list-style-type: none"> <li>▪ Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations</li> <li>▪ Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets</li> <li>▪ Plan for growth near transit investments and support implementation of first/last mile strategies</li> <li>▪ Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods</li> <li>▪ Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations)</li> </ul>	Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.	<p><b>Consistent.</b> The Project consists of a 134-unit single-family development. The Project site is currently vacant and would redevelop the underutilized land to accommodate new growth by increasing the housing development within the City. Also, the Project site is located near existing bus stops serviced by Riverside Transit Agency (RTA) located less than half a mile to the Northwest and southwest of the Project site.</p> <p>Additionally, the Project would provide bicycle parking spaces, which would promote alternative modes of transportation that can reduce VMT. As such, the Project</p>

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
<ul style="list-style-type: none"> <li>Identify ways to “right size” parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)</li> </ul>		would be consistent with this reduction strategy.
<b>Promote Diverse Housing Choices</b>		
<ul style="list-style-type: none"> <li>Preserve and rehabilitate affordable housing and prevent displacement</li> <li>Identify funding opportunities for new workforce and affordable housing development</li> <li>Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply</li> <li>Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions</li> </ul>	PGA, Job Centers, HQTAs, NMA, TPAs, Livable Corridors, Green Region, Urban Greening.	<b>Consistent.</b> The Project would involve development of a single-family residential community near the existing bus stops which increases housing supply and supports reduction of GHG emissions. Therefore, the Project would promote diverse housing choice by increasing housing within the City and is consistent with this reduction strategy.
<b>Leverage Technology Innovations</b>		
<ul style="list-style-type: none"> <li>Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space</li> <li>Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments</li> <li>Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage and power generation</li> </ul>	HQTA, TPAs, NMA, Livable Corridors.	<b>Consistent.</b> The Project would comply with all applicable 2022 Title 24 and CALGreen building codes at the time of construction. The Project would install high efficiency lighting and use energy efficient appliances. The Project would provide solar ready roofs in accordance with the 2022 Title 24 standards and CALGreen Code.  Therefore, the proposed development would leverage technology innovations and help the City, the county, and the state meet its GHG reduction goals. The Project would be consistent with this reduction strategy.
<b>Support Implementation of Sustainability Policies</b>		
<ul style="list-style-type: none"> <li>Pursue funding opportunities to support local sustainable development implementation Projects that reduce greenhouse gas emissions</li> <li>Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations</li> </ul>	Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit	<b>Consistent.</b> As previously discussed, the Project site is located near existing bus stops serviced by RTA. Further, the Project would comply with sustainable practices included in
<b>Promote a Green Region</b>		
<ul style="list-style-type: none"> <li>Support development of local climate adaptation and hazard mitigation plans, as well as Project implementation that</li> </ul>	Green Region, Urban Greening, Greenbelts and Community Separators	<b>Consistent.</b> The proposed Project is a housing development in an urbanized area and would therefore not

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
<p>improves community resiliency to climate change and natural hazards</p> <ul style="list-style-type: none"> <li>▪ Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration</li> <li>▪ Integrate local food production into the regional landscape</li> <li>▪ Promote more resource efficient development focused on conservation, recycling and reclamation</li> <li>▪ Preserve, enhance and restore regional wildlife connectivity</li> <li>▪ Reduce consumption of resource areas, including agricultural land</li> <li>▪ Identify ways to improve access to public park space</li> </ul>		<p>interfere with regional wildlife connectivity or agricultural land. The Project would be required to comply with sustainable practices included in the 2022 Title 24 standards and CALGreen Code, which would help reduce energy consumption and reduce GHG emissions. Thus, the Project would support efficient development that reduces energy consumption and GHG emissions. The Project would be consistent with this reduction strategy.</p>

Source: Southern California Association of Governments, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 3, 2020.

### Consistency with 2022 CARB Scoping Plan

The 2022 Scoping Plan identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Actions that reduce GHG emissions are identified for each AB 32 inventory sector. Provided in **Table 14, Consistency with the 2022 Scoping Plan: AB 32 GHG Inventory Sectors**, is an evaluation of applicable reduction actions/strategies by emissions source category to determine how the Project would be consistent with or exceed reduction actions/strategies outlined in the 2022 Scoping Plan.

**Table 14: Consistency with the 2022 Scoping Plan: AB 32 GHG Inventory Sectors**

Actions and Strategies	Project Consistency Analysis
<b>Smart Growth / Vehicles Miles Traveled (VMT)</b>	
<p>Reduce VMT per capita to 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.</p>	<p><b>Consistent.</b> The Project proposes to build a single-family residential development with park uses. Based on the TTM 39162 Residential VMT Analysis, prepared by TJW Engineering dated February 27, 2025, the Project generated VMT under Baseline Year and Year 2040 with Project conditions does not exceed the City’s per capita VMT. Additionally, the Project would provide bicycle parking spaces, which would promote alternative modes of transportation that can reduce VMT. As such, the Project would be consistent with this action.</p>
<b>New Residential and Commercial Buildings</b>	
<p>All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.</p>	<p><b>Consistent.</b> The Project is expected to consist of all electric appliances with no natural gas service. The City of Moreno Valley has not adopted an ordinance or program limiting the use of natural gas for on-site cooking and/or heating. However, if adopted, the Project would comply with the applicable goals or policies limiting the use of natural gas equipment in the future. Furthermore, the Project would install</p>

Actions and Strategies	Project Consistency Analysis
	high efficiency lighting and appliances and is also expected to use all electric landscaping equipment. As such, the Project would be consistent with this action.
<b>Food Products</b>	
Achieve 7.5% of energy demand electrified directly and/or indirectly by 2030 and 75% by 2045.	<b>Consistent.</b> As mentioned above, the City of Moreno Valley has not adopted an ordinance or program limiting the use of natural gas for on-site cooking and/or heating. However, if adopted, the Project would comply with the applicable goals or policies limiting the use of natural gas equipment in the future. As such, the Project would be consistent with the action.
<b>Non-combustion Methane Emissions</b>	
Divert 75% of organic waste from landfills by 2025.	<b>Consistent.</b> The Project would be required to demonstrate compliance with AB 341, which requires a waste reduction target of 75 percent for residential uses. As such, the Project would be consistent of this action.

Source: California Air Resources Board, 2022 Scoping Plan, November 16, 2022.

**Consistency with City of Moreno Valley CAP**

The proposed Project’s consistency with the applicable measures in the 2021 CAP for a new single-family home development are shown in **Table 15, Consistency with City’s Applicable CAP Policies.**

**Table 15: Consistency with City’s Applicable CAP Policies**

Actions and Strategies	Project Consistency Analysis
<b>Transportation Measures</b>	
TR-5: Implement trip reduction programs in new residential, commercial, and mixed-use developments.	Consistent. The Project proposes to build a single-family residential development with park uses. Based on the TTM 39162 Residential VMT Analysis, prepared by TJW Engineering, In. dated February 27, 2025, the Project generated VMT under Baseline Year and Year 2040 with Project conditions does not exceed the City’s per capita VMT. Additionally, the Project would provide bicycle parking spaces, which would promote alternative modes of transportation that can reduce VMT. As such, the Project would be consistent with this measure.
<b>Residential Measures</b>	
R-2: Require new construction and major remodels to install interior real-time energy smart meters in line with current utility provider (e.g., MVU, SCE) efforts.	<b>Consistent.</b> The Project would install smart energy meters in line with current utility provider (e.g., MVU, SCE) efforts.
<b>Off-Road Equipment</b>	
OR-1: Encourage residents and businesses to use efficient lawn and garden maintenance equipment or to reduce the need for landscape maintenance through native planting. <ul style="list-style-type: none"> <li>▪ Partner with the SCAQMD to establish a voluntary exchange program for residential</li> </ul>	<b>Consistent.</b> The Project would be required to implement the 2022 Title 24 Part 11 and CalGreen building standards that require that the homes include electrical outlets on the exterior of the proposed homes to allow for plug-in electrical landscaping equipment to be used for lawn and

Actions and Strategies	Project Consistency Analysis
electric lawnmowers and backpack-style leaf blowers. <ul style="list-style-type: none"> <li>▪ Require new buildings to provide electrical outlets in an accessible location to facilitate use of electric-powered lawn and garden equipment.</li> <li>▪ In Project review, encourage the replacement of high maintenance landscapes (like grass turf) with native vegetation to reduce the need for gas-powered lawn and garden equipment.</li> </ul>	garden maintenance. As such, the Project would be consistent with this measure.
OR-2: Reduce emissions from heavy-duty construction equipment by limiting idling based on SCAQMD	<b>Consistent.</b> The Project would be required to comply with the California Code of Regulations, Title 13, Sections 2449(d)(3) and 2485.

**Mitigation Measures**

None required.

**Technical Reports**

1. Air Quality and Greenhouse Gas CalEEMod Summary Report, prepared by EPC Environmental, Inc., dated July 31, 2025 and provided as **Appendix A** of this IS/MND.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. Hazards and Hazardous Materials – Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Exposure of the public or the environment to hazardous materials can occur through improper handling or use of hazardous materials or hazardous wastes, particularly by untrained personnel, a transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

Project construction could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction materials (i.e., oil, diesel fuel, transmission fluid, etc.). These activities would be short-term, and the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. All Project construction activities would demonstrate compliance with the applicable laws and regulations governing the use, storage, and transportation of hazardous materials, ensuring that all potentially hazardous materials are used and handled in an appropriate manner. Impacts concerning the routine transport, use, or disposal of hazardous materials during Project construction would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:**

**Construction Impacts**

During Project construction, there is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, state, and federal law. Construction impacts in this regard would be less than significant.

**Operational Impacts**

Hazardous materials are not typically associated with single-family residential uses. Anticipated hazardous materials use may include minor cleaning products and the occasional use of pesticides and herbicides for landscape maintenance. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. As such, impacts concerning the significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would not occur with Project implementation. Therefore, potential hazardous materials impacts relative to operation of the Project would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** There are no existing schools within one-quarter mile of the proposed Project site. The nearest elementary school is Ridgecrest Elementary School at 28500 John F Kennedy Drive, located approximately 0.6 mile south of the Project site. The nearest middle school is Landmark Middle School at 15261 Legendary Drive, located approximately 0.8 mile southwest of the Project site. The nearest high school is Valley View High School at 13135 Nason Street, approximately 1.3 mile northwest of the Project site.

Therefore, the proposed Project would not result in impacts related to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. A less than significant impact would occur in this regard.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to <a href="#">Government Code section 65962.5</a> and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Existing and past land use activities are used as potential indicators of hazardous material storage and use. For example, many historic sites, historic and current, have soil or groundwater contamination as a result of spills of hazardous substances and petroleum products. Other hazardous materials sources include leaking underground storage tanks in commercial and rural areas. Government Code §65962.5 requires the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB) to compile and update a regulatory sites listing (per the criteria of the Section).<sup>19</sup>

Based upon a review of the EnviroStor database managed by the DTSC, no records of federal Superfund, State Response, Voluntary Cleanup, Corrective Action or Evaluation occur within one mile of the Project site. Based upon a review of the SWRCB GeoTracker website, no records of LUST Cleanup Sites, Cleanup Program Sites, or Military Cleanup, Privatized, or UST Sites occur within one mile of the Project site.<sup>20</sup>

Because the Project site is not listed as a hazardous materials site and there are no known active hazardous materials sites within one mile of the site, implementation of the Project would not create a significant hazard to the public or the environment. Therefore, a less than significant impact would occur in this regard.

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

**Response:** The Project site is not located within 2 miles of an airport. The nearest airport is the March Air Reserve Base located approximately 4.9 miles west of the Project site. According to the March Air Reserve Base Land Use Compatibility Plan, the Project is not located in a compatibility zone.<sup>21</sup> Additionally, the residential development would not be of sufficient height to require modifications to the existing air traffic patterns at the airport and, therefore, would not affect aviation traffic levels or otherwise result in substantial aviation-related safety risks. Therefore, a less than significant impact would occur relative to airport safety hazards.

19 State Water Resources Control Board, GeoTracker website, <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=28136+Brodiaea+Ave%2C+Moreno+Valley+CA>. Accessed April 2, 2025.

20 Department of Toxic Substances Control, EnviroStor Website, <https://www.envirostor.dtsc.ca.gov/public/>, accessed April 2, 2025.

21 March Air Reserve Base Land Use Compatibility Plan, <https://rcaluc.org/sites/g/files/aldnop421/files/2023-06/March.pdf>, accessed August 3, 2025.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Activities associated with the Project would not impede existing emergency response plans for the Project site and/or other land uses in the Project vicinity. The Project does not propose changes to the City’s circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to area roadways. Furthermore, should partial lane closures be required as part of Project construction activities, implementation of a traffic management plan would minimize congestion and ensure safe travel, including emergency access in the Project vicinity. Therefore, the impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** As discussed in Section XX, *Wildfire*, the Project site is located in a moderately developed area surrounded by residential and commercial uses and is not located in a zone designated as Very High Fire Hazard by the California Department of Forestry and Fire Protection (CalFire). Urban levels of fire protection would be provided to the Project area. In addition, the Project would adhere to building codes and any conditions included through review by the Moreno Valley Fire Department (MVFD). No impact would occur in this regard.

**Mitigation Measures**

None required.

**Technical Reports**

1. Phase 1 Environmental Site Assessment, Stantec, prepared by Stantec, dated October 15, 2024, and provided as Appendix F of this IS/MND.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. Hydrology and Water Quality – Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** As part of Section 402 of the Clean Water Act, the USEPA has established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control direct stormwater discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include

construction activities. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The Project site is located within the jurisdiction of the Santa Ana RWQCB.

Impacts related to water quality typically range over three different periods: 1) during the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest; 2) following construction, prior to the establishment of ground cover, when the erosion potential may remain relatively high; and 3) following completion of the Project, when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.

Project construction could result in short-term impacts to water quality due to the handling, storage, and disposal of construction materials, maintenance and operation of construction equipment, and earthmoving activities. These potential pollutants could damage downstream waterbodies. Dischargers whose Projects disturb one or more acres of soil or whose Projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the NPDES Permit No. 618033, and the SWRCB's General Permit for Discharges of Stormwater Associated with Construction Activity, Construction General Permit (CGP/SWPPP), and Order R8-2010-0033 (Construction General Permit). The Construction General Permit requires the Project Applicant to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would specify BMPs to be used during Project construction to minimize or avoid water pollution, thereby reducing potential short-term impacts to water quality. Upon completion of the Project, the Project Applicant would be required to submit a Notice of Termination to the SWRCB to indicate that construction has been completed.

To further minimize the potential for accidental release of pollutants during Project construction, the routine transport, use, and disposal of construction materials would be required to adhere to applicable state and local standards and regulations for handling, storage, and disposal of hazardous substances; refer to Section IX, Hazards and Hazardous Materials, of this IS/MND. Compliance with such measures would prevent such substances from entering downstream water bodies via stormwater runoff and adversely affect existing water quality. Following conformance with the Construction General Permit, SWPPP, and implementation of best management practices (BMPs), the Project's short-term impacts to water quality and waste discharge requirements would be less than significant.

The Project would be required to implement BMPs to minimize operational impacts to water quality. As detailed in the Project's WQMP Report, potential sources of runoff pollutants include landscaping/outdoor pesticide use, nutrients, oil and grease and runoff from impervious surfaces. As a result, the WQMP includes permanent and operational source control BMPs pursuant to the construction of on-site storm drain inlets, drain lines, a catch basin and BMP management of landscape planning, efficient irrigation, roof runoff controls, storm drain signage and private street sweeping. With implementation of these BMPs, the Project's impacts to water quality would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Project development would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater

management. The Project site is not currently used for groundwater recharge purposes. Water for the Project would be provided by EMWD, and the Project would connect to the existing water system. Thus, Project implementation would not substantially decrease groundwater supplies nor interfere substantially with groundwater recharge. Impacts would be less than significant in this regard.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				
i) Result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** According to the Project’s WQMP Report, approximately 501,543 square feet of impervious surfaces would be created as a result of Project development along with an additional 125,387 square feet of landscaping. Although the Project would result in an increase in impervious surfaces, the proposed Project overall would not substantially alter the existing drainage pattern of the site.

In its current condition, drainage flows to the southerly boundary right of way onto Brodiaea Avenue and continues westerly along Brodiaea Avenue to enter the 33” storm drain at the intersection of Brodiaea Avenue and Moreno Beach Drive per the master plan drainage map.

In the developed condition, a proposed storm drain system would convey runoff from the Project site to a proposed onsite detention basin located on the southwest corner of the site. The basin is designed to capture water quality flows and provide runoff treatment for the required Design Capture Volume (DCV). Impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Refer to Responses X.b) and X.c) i) above. The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Refer to Responses X.c) i), X.c) ii) and X.c) iii), above. On-site stormwater runoff associated with the Project would be engineered to be conveyed through public street improvements and on-site infiltration to dispose of stormwater. Additionally, with the required implementation of a SWPPP and WQMP as discussed above, the proposed Project would not generate a substantial source of polluted runoff. The Project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems. A less than significant impact would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The Project site is relatively flat. The proposed Project would include the development of a storm drainage system consistent with City requirements to convey stormwater runoff to a 90-inch RCP in Brodiaea Avenue. Stormwater management practices as required under Moreno Valley Municipal Code Chapter 8.10, Stormwater/Urban Runoff Management and Discharge Controls, would further reduce any impacts to a less than significant level. In addition, proposed on-site storm drain inlets, drain lines, catch basins, underground infiltration/retention chambers, front yard typical/onsite landscaping and streetscape landscaping to Brodiaea Avenue would assist in minimizing the potential for impediment or redirect flood flows. Therefore, the impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Based on a review of the Federal Emergency Management Agency's (FEMA) National Flood Hazard Layer Viewer, the Project site is located within Flood Insurance Rate Map (FIRM) Panel Number 06065C0770G. Specifically, the Project site is located in an area described as a 0.2% annual flood zone hazard area. However, as stated above in Hazards and Hazardous Materials Section 9(b), no nearby properties are identified as hazardous or potentially hazardous sites such that inundation of the Project site would include the spread of potentially hazardous substances. Therefore, impacts would be less than significant in this regard.

The proposed Project site is located approximately 43 miles inland from the Pacific Ocean. Due to this location, tsunamis are not considered a threat. No impact would occur in this regard.

The nearest water body to the Project site is Lake Perris located approximately 3.5 miles to the south. Therefore, because the proposed Project is not adjacent to any marine or inland water bodies, impacts from seiche are not expected to occur. No impact would occur in this regard.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The Project site is located in the Santa Ana River Hydrologic Unit in the South Coast Hydrologic Region. The Santa Ana RWQCB oversees basin planning and water quality in the Santa Ana River Hydrologic Unit. The Santa Ana RWQCB prepares the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) to protect local surface waters and groundwater basins. The Basin Plan designates beneficial uses of waters in the region and provides objectives to maintain or improve water quality in the region.

The California Department of Water Resources (DWR) has initiated a technical process called Basin Prioritization, which utilizes the best available data and information to classify California’s 515 groundwater basins into one of four categories high-, medium-, low-, or very low-priority, based on eight components that are identified in the California Water Code §10933(b). Each basin’s priority determines which provisions of California Statewide Groundwater Elevation Monitoring (CASGEM) and the Sustainable Groundwater Management Act (SGMA) apply. SGMA requires medium- and high-priority basins to develop groundwater sustainability agencies (GSAs), develop groundwater sustainability plans (GSPs) and manage groundwater for long-term sustainability. The DWR approved the San Jacinto Basin Groundwater Sustainability for the San Jacinto Basin on February 27, 2023.<sup>22</sup>

As described in Response X.c) i) above, the Project would install an underground infiltration/retention chamber to satisfy the requirements of the NPDES permit. Since the NPDES permit is intended to protect water quality, compliance with the permit would ensure that the Project would not impair existing or potential beneficial uses of nearby or downstream water bodies and would not conflict with or obstruct implementation of the Basin Plan. The proposed Project does not propose the drilling of a well to obtain groundwater for consumption. The Project would not conflict with a groundwater management plan. Impacts would be less than significant.

**Mitigation Measures**

None required.

**Technical Sources**

1. Preliminary Hydrology Study for TTM 39162, prepared by C&V Consulting, Inc., dated January 2025, updated May 2025, and as provided as **Appendix G** of this IS/MND
2. Project Specific Preliminary Water Quality Management Plan (WQMP Report), prepared by C&V Consulting, Inc., dated January 2025, updated May 2025, and as provided as **Appendix J** of this IS/MND

22 California Department of Water Resources SGMA Basin Prioritization Dashboard. Nd. <https://gis.water.ca.gov/app/bp-dashboard/final/>. Accessed April 2, 2025.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. Land Use and Planning – Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** The physical division of an established community is typically associated with construction of a linear feature, such as a major highway or railroad tracks, or removal of a means of access, such as a local road or bridge, which would impair mobility within an existing community or between a community and an outlying area.

None of the proposed Project components would constitute a barrier that would physically divide an established community. No new linear features are included in the Project. Access to and movement throughout the Project area and the City would not be physically impaired due to the Project.

Therefore, the proposed Project would not physically divide an established community and no impact would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:**

### Consistency with Plans, Policies, and Regulations

As discussed above, the proposed Project seeks to develop 134 single-family detached residential units on the Project site. To develop the site as a residential community, the Project would require the approval of the following:

- General Plan Amendment. The Project includes a proposal to change the General Plan land use designation from Residential (R3) to Residential (R10).
- Zone Change. The Project includes a proposal to change the zoning designation from Suburban Residential (R3) to Suburban Residential (R10).
- Planned Unit Development is a request to subdivide 14.4 gross acres (14.22 net acres) into 134 single-family residential lots with private internal streets, street lighting, sewer, water, and perimeter block wall.
- Design Review. The Project is required to submit plans to the City to determine that the Project meets the City’s design guidelines.

Throughout this Initial Study document, land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect have been considered in the environmental impact analysis for each environmental topic. These include, but are not limited to:

- California Air Resources Board, AB 32 Climate Change Scoping Plan
- California Energy Code (Title 24, Part 6)
- California Green Building Standards Code (Part 11, Title 24)
- City of Moreno Valley Climate Action Plan
- City of Moreno Valley, General Plan 2040 policies
- City of Moreno Valley Development Code

- Santa Ana River Basin, Water Quality Control Plan
- South Coast Air Quality Management District, 2022 Air Quality Management Plan
- Southern California Association of Governments, 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy
- Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)

**General Plan and Zoning Considerations**

The Project site is currently designated R3 Residential by the General Plan Land Use Map<sup>23</sup>. The primary purpose of the R3 Residential land use designation is to provide a transition between rural and urban density development areas, and to provide for a suburban lifestyle on residential lots larger than those commonly found in suburban subdivisions. The maximum allowable density shall be 3.0 dwelling units per acre. The R3 Suburban Residential zoning classification contains the development standards required to implement the R3 Residential designation.

The Project is proposing a General Plan amendment to R10 Residential. The purpose of the R10 Residential land use designation is to provide for a variety of residential products and to encourage innovation in housing types. Developments within R10 Residential areas are typically expected to provide amenities not generally found in suburban subdivisions, such as common open space and recreational areas. The maximum allowable density shall be 10.0 dwelling units per acre. The R10 Suburban Residential zoning classification contains the development standards required to implement the R10 Residential designation.

As shown in **Figure 4, Proposed General Plan Land Use Map Amendment**, and **Figure 5, Proposed Zoning Map Amendment**, on pages 9 and 10, the Project site is situated adjacent to or nearby other properties that are designated for more intense use, such as Commercial, R5, and RS10. As such, it would be a logical extension of surrounding land uses and would not physically divide an existing community.

Additionally, the proposed General Plan Amendment and Zone Change are consistent with General Plan Policy LCC.4-2 which states “Promote the development of a greater variety of housing types, including single-family homes on small lots, accessory dwelling units, townhomes, lofts, live-work spaces, and senior and student housing to meet the needs of future demographics and changing family sizes.”

**Mitigation Measures**

None required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. Mineral Resources – Would the project:</b>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** According to the 2040 General Plan, the mineral resources known to be located within the City are common materials: sand, gravel, and rock. Sand and gravel are used to make concrete and as road base. There are no active mineral resource extraction facilities within the Planning Area.

<sup>23</sup> City of Moreno Valley, Figure 2-2, Land Use Map, [https://www.moval.org/city\\_hall/general-plan/landuse-map.pdf](https://www.moval.org/city_hall/general-plan/landuse-map.pdf), accessed May 31, 2025.

The existing 2006 General Plan land use map, as well as the proposed GPU land use map, does not delineate any mineral resource recovery sites, or designate any land for mineral resource production.<sup>24</sup>

According to Figure 4.12-1, Mineral Resource Zones, of the City’s 2040 General Plan EIR, the majority of the City, as well as the Project site, is located within an area classified by the State Mining and Geology Board as Mineral Resource Zone 3 (MRZ-3), which are areas containing known or inferred mineral occurrences of undetermined mineral resource significance. However, because the site is surrounded by urbanized areas, any potential mining activities on the site would be limited by the surrounding land uses. In addition, the Project site has no history of use as a mineral resources recovery operation. As such, the Project site is not considered a source for mineral resources, and Project development would not result in the loss of availability of known mineral resources. No impacts would occur in this regard.

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

**Response:** Refer to Response XII.a) above. No mineral resources are anticipated within the Project area. No impact would occur.

**Mitigation Measures**

None required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIII. Noise – Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The primary noise source in the vicinity of the Project site is from motor vehicle traffic traveling along Brodiaea Avenue. Noise measurements were taken at four locations during May 20 and May 21, 2025. (See **Appendix H**). The results of the measurements are shown in **Figure 11, Noise Measurement Locations**, below.

24 MoVal 2040 Revised Draft Program EIR, 2040 GP EIR, page 4.12-1. Available at: <https://moval.gov/cdd/pdfs/projects/mv2040/RevisedDraftProgramEIR.pdf>

Figure 10. Noise Measurement Locations



According to the General Plan EIR, long-term noise that affects sensitive land uses would be considered substantial and constitute a significant noise impact if a project would:

- Increase noise levels by 5 dB or more where the “no project” noise level is less than 60 CNEL;
- Increase noise levels by 3 dB or more where the “no project” noise level is 60 CNEL to 65 CNEL; or
- Increase noise levels by 1.5 dB or more where the “no project” noise level is greater than 65 CNEL.<sup>25</sup>

According to the noise measurements contained in **Appendix H**, and as shown in **Figure 11**, *Noise Measurement Locations*, the existing noise level along Brodiaea Avenue is 61.7 CNEL. Therefore, an increased in noise levels greater than 3 dB would be considered a potentially significant impact.

The following analysis is summarized from **Appendix H**, *Noise Measurement Data*, **Table 16**, *Summary of Noise Impacts*, provides a numeric summary of the increase in noise levels.

### Short-Term Construction Impacts

Construction activities generally are temporary and have a short duration, resulting in periodic increases in the ambient noise environment. Construction activities would occur over approximately 19 months and would include the following phases: grading, building construction, paving, and architectural coating. Ground-borne noise and other types of construction-related noise impacts would typically occur during the initial earthwork phases. Operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by 3 to 4 minutes at lower power settings.

Although the residences adjacent to the northern boundary of the Project site may be exposed to increased noise levels during Project construction, construction activities are a normal part of urban life. However, the Project would be required to comply with the City’s allowable construction hours. Compliance with the Municipal Code would minimize impacts from construction noise, as construction would be limited to the permitted times. By following Municipal Code standards, Project construction activities would result in a **less than significant** noise impact.

### Traffic Noise

The proposed Project would include 134 single-family residential developments and park uses. Future buildout of the Project could result in increased traffic and, thus, increased traffic noise levels on-site and on adjacent roadways. Roadway segment noise levels for the “Existing” and “Existing with Project” scenarios were compared to evaluate Project-related operational noise impacts using the AM and PM Peak traffic data from the Project’s Traffic Impact Analysis for the intersection of Moreno Beach Drive and Brodiaea Avenue. The increase in ambient noise between the two scenarios would be 0.3 dBA for the AM Peak traffic noise levels and 0.4 dBA for the PM Peak traffic noise levels. As these noise level increases are below 3.0 dBA, a **less than significant** impact would occur in this regard.

### Mechanical Equipment

Heating ventilation and air conditioning (HVAC) units typically generate noise levels of approximately 60 dBA Leq at 20 feet from the source.<sup>26</sup> The closest sensitive receptor to a proposed HVAC unit are the single-family residential uses located immediately adjacent to the west and northeast of the Project site. At the distance of 200 feet, HVAC noise levels would attenuate to approximately 40 dBA, which is below City’s exterior daytime and nighttime standards of 60 dBA and 55 dBA,

25 MoVal 2040 Revised Draft Program EIR, pp. 4.13-28 and 4.13-29, <https://moval.gov/cdd/pdfs/projects/mv2040/RevisedDraftProgramEIR.pdf>, accessed August 1, 2025.

26 *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, <https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://multimedia.3m.com/mws/media/888553O/noise-navigator-sound-level-hearing-protection-database.pdf&ved=2ahUKEwipy7->, accessed June 1, 2025.

respectively. As shown in **Table 16, Summary of Noise Impacts**, the nearest sensitive receptors would not be directly exposed to substantial noise levels from construction or operations, and impacts would be **less than significant**.

**Table 16: Summary of Noise Impacts**

Noise Source	Without Project (dBA)	With Project (dBA)	Threshold	Potentially Significant?
<b>Construction</b>				
All equipment other than Graders	N/A	≤ 65.0	(Municipal Code Section 11.80.030[D][7]). Municipal Code Section 11.80.030[D][7], Construction and Demolition, permits construction activities between 7:00 a.m. to 8:00 p.m. Monday through Sunday. Furthermore, grading operations shall be limited to the hours identified in Municipal Code Section 8.21.050(O) of 7:00 a.m. to 6:00 p.m., Monday through Friday, and 8:00 a.m. to 4:00 p.m. on Saturday. No grading operations are allowed on holidays	No
Graders	N/A			
<b>Long Term Operations</b>				
Traffic	59.8	60.2	Increase of more than 3dBA	No
Mechanical Equipment	N/A	40.0	Exceed exterior daytime and nighttime standards of 60 dBA and 55 dBA, respectively	No
Residential Activities	N/A	N/A	For residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment.”	No

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Caltrans Transportation and Construction Vibration Manual identifies various vibration damage criteria for different building classes. This evaluation uses the Caltrans architectural damage criterion for continuous vibrations at new residential structures and modern industrial/commercial buildings of 0.5 inch-per-second (inch/second) PPV. The types of construction vibration impacts include human annoyance and building damage. Annoyance is assessed based on levels of perception, with a PPV of 0.01 inch/second being considered “barely perceptible,” 0.04 inch/second as “distinctly perceptible,” 0.1 inch/second as “strongly perceptible,” and 0.4 inch/second as “severe.” Human

annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time.

Construction of the proposed Project would occur over approximately 19 months and would include grading, paving, building construction, and architectural coatings. The highest degree of groundborne vibration would be generated during the grading phase due to the operation of bulldozers. The Project is also expected to use vibratory rollers during the paving phase. However, the Project would not require pavement within 50 feet of the closest sensitive receptors. As a result, vibratory rollers are not expected to operate within 50 feet from the nearest residential building to the northeast. Groundborne vibration levels associated with representative construction equipment are summarized in **Table 17, Typical Vibration Levels for Construction Equipment**.

**Table 17: Typical Vibration Levels of Construction Equipment**

Equipment	Approx. Peak Particle Velocity at 15 Feet (inches/second)	Approx. Peak Particle Velocity at 25 Feet (inches/second)	Approx. Peak Particle Velocity at 35 Feet (inches/second)
Loaded Trucks	0.164	0.076	0.046
Large Bulldozers	0.192	0.089	0.054
Small Bulldozer/Tractors	0.007	0.002	0.002
Vibratory Rollers	NA	0.210	0.127

Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, April 2020

**Response:** As indicated in **Table 17, Typical Vibration Levels for Construction Equipment**, vibration velocities from typical heavy construction equipment operation would range from 0.002 to 0.089 inch/second PPV at 25 feet from the source of activity. The nearest structures to the Project site are single-family residential buildings located immediately to the north, east, and south of the Project site. However, construction activities are expected to occur as greater than 50 feet from the nearest sensitive receptor building located near the southeastern corner of the Project site. Groundborne vibration decreases rapidly with distance. As such, using the using the 35-foot calculated vibration velocities from typical heavy construction equipment operation would range from 0.002 to 0.127 inch/second PPV at 35 feet from the source of activity the construction activities. As previously noted, vibratory rollers are not expected to operate within 50 feet from the nearest residential buildings to the north and southeast. As such, the vibration level during the operation of vibratory rollers would be 0.127 inch/second PPV at 35 feet. As a result, construction groundborne vibration would not be capable of exceeding the 0.50 inch/second PPV significance threshold for vibration to the nearest structures and a **less than significant impact** would occur in this regard.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** The Project site is located outside the March Air Reserve Base Airport influence area and is outside the 60 CNEL noise contour level.<sup>27</sup> Additionally, the Project site is not located within

27 Air Force Reserve Command, Final Installations Compatible Use Zones Study March Air Reserve Base Riverside, 2018, [https://www.marchjpa.com/documents/docs\\_forms/AICUZ\\_2018.pdf](https://www.marchjpa.com/documents/docs_forms/AICUZ_2018.pdf), Accessed April 4, 2025.

the vicinity of a private airstrip or any airport land use plan, or within 2 miles of a public airport or public use airport. As such, **no impacts** would occur in this regard.

**Mitigation Measures**

None required.

**Sources**

1. *Noise Measurement Data*, prepared by ECORP dated May 2025 and provided as **Appendix H** to this IS/MND.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. Population and Housing – Would the project:</b>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** The Project proposes 134 new homes. Currently designated as R3 Residential, the site allows up to 3 units per acre, intended as a transition between rural and urban densities with larger lot sizes. The Project seeks a General Plan amendment to R10 Residential, permitting up to 10 units per acre and encouraging diverse housing options and amenities like common open spaces. Since the site is already designated for residential use by the General Plan, this development is consistent with planned land uses.

Additionally, the Project site is located in an area that has existing infrastructure (i.e. roads, water lines, sewer lines, storm drain facilities, electricity, and natural gas lines). The Project would connect to these existing facilities in the immediate vicinity of the site, and no additional off-site extensions would be required. Thus, impacts are **less than significant**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The Project site is currently vacant. There are no existing residences on-site. As such, Project implementation would not displace existing people or housing. No impacts would occur in this regard.

**Mitigation Measures**

None required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XV. Public Services – Would the project:</b>				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Fire and emergency medical services are provided by the Moreno Valley Fire Department (MVFD), under contracts with the Riverside County Fire Department (RCFD) and the California Department of Forestry and Fire Protection (CAL FIRE) for provision of services as part of an integrated regional fire protection system. The MVFD operates seven fire stations in Moreno Valley. The nearest fire station to the Project site is Station 58, located at 28040 Eucalyptus Avenue, Moreno Valley, CA 92555, approximately 1.5 miles north of the Project site. In addition, Morrison Park Fire Station, Station 99 located approximately 1.7 miles northwest of the Project site at 13400 Morrison Street.

The proposed Project would create an increased demand for fire protection services as a result of the addition of new residents. However, the Project would not induce significant or unplanned population growth; refer to Section XIV, *Population and Housing*. Further, the proposed Project would be conditioned to comply with the requirements of the MVFD for emergency access, fire flow, fire protection standards, fire lanes, and other site design/building standards. The Project would also be subject to the Project design requirements set forth in the 2019 California Fire Code and the 2019 California Building Standards Code. 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. Payment of these fees would offset the Project’s impacts to the acquisition, design, and construction of new fire facilities. Following collection of development impact fees and compliance with MVFD, California Fire Code (included in the Moreno Valley Municipal Code Chapter 8.36, California Fire Code), and CBC requirements, impacts to fire protection facilities would be **less than significant**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The Moreno Valley Police Department (MVPD) provides law enforcement services through a contract with the Riverside County Sheriff’s Department (RCSD) for police protection services. Specifically, police protection services for the Project area are provided by the MVPD located at 22850 Calle San Juan De Los Lagos in Moreno Valley, approximately 5.1 miles west of the Project site.

The proposed Project would create an increased demand for police protection services. However, the Project would not induce significant or unplanned population growth; refer to Section 4.14,

*Population and Housing.* 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 police protection facilities. Payment of these fees would offset the Project’s impacts to the acquisition, design, and construction of new police facilities. The MVPD would have the opportunity to review the Project design plans and include conditions that would be required in order for the applicant to be issued development permits. As a 134-unit residential development, the proposed Project is not expected to result in any unusual circumstances that may generate high demand for police protection services. Therefore, payment of the City’s development impact fees would fully mitigate any potential impact on MVPD facilities. A **less than significant** impact would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The proposed Project site is located within the boundaries of the MVUSD. The nearest elementary school is La Jolla Elementary School, Located at 14745 Willow Grove Place, Moreno Valley, CA 92555, approximately 0.7 miles to the southwest. Additionally, Moreno Elementary School at 26700 Cottonwood Avenue, located approximately 1.2-miles west of the Project site. The nearest middle school is Mountain View Middle School at 13130 Morrison Street, located approximately 1.6 miles northwest of the Project site. The nearest high school is Valley View High School at 13135 Nason Street, approximately 1.5 miles northwest of the Project site.

The Project would not induce significant or unplanned population growth; refer to Section XIV, *Population and Housing*. In addition, the Project would be required to comply with Senate Bill (SB) 50 requirements, which allow school districts to collect impact fees from developers of new Projects. According to §65997 of the California Government Code, payment of statutory fees is the exclusive method of mitigating environmental effects related to the adequacy of school facilities when considering the approval or the establishment of conditions for the approval of a development Project. Thus, upon payment of required fees by the Project Applicant consistent with existing state requirements, impacts would be **less than significant**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The City’s Parks and Community Services Department maintains approximately 482 acres of parkland within the Planning Area, which consists of 7 community parks, 24 neighborhood parks, 4 specialty parks and 15 miles of trails/greenways existing and proposed park and recreational facilities. Additionally, the City maintains joint use agreements with the MVUSD for off-hour use of some school facilities, including gymnasiums and swimming pools. The nearest park, Ridgecrest Park, is approximately 0.40 miles south of the Project site. In addition, according to Figure 4.15-2, *Existing and Planned Parks and Recreation Facilities*, of the City’s 2040 General Plan EIR<sup>28</sup>, there is

28 City of Moreno Valley General Plan 2040, Parks and Public Services Section 5, <https://moval.gov/cdd/documents/about-projects.html#moVal2040>, accessed July 15, 2025

a potential planned park site located approximately 0.3-mile east of the Project site along Brodiaea Avenue. These facilities may be utilized by residents of the Project in the future.

The Project would not induce significant or unplanned population growth; refer to Section XIV, *Population and Housing*. As described previously, the Project contains an outdoor open space for use by the residents comprised of one onsite park totaling 1.7 acres. In addition, Section 3.38.080, Park Improvements Residential Development Impact Fees, and Chapter 3.40, Dedication of Land for Park Facilities and Payment of In-Lieu Fees, of the Moreno Valley Municipal Code include requirements for mitigation fees in favor of park improvements and/or parkland dedication; where applicable, these fees would be included as a condition of the approval of the residential development. Therefore, this impact would be **less than significant**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The Project would not induce significant or unplanned population growth; refer to Section XIV, *Population and Housing*. The Project involves the development of a 134-unit single-family residential development and does not propose new or physically altered public facilities. Thus, the proposed Project would not result in an increase in the demand for other governmental services such as economic development and other community support services commonly provided by the City. This impact would be less than significant.

**Mitigation Measures**

None required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVI. Recreation – Would the project:</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Refer to Response XV.a) iv). It is not anticipated that the proposed Project would generate a substantial number of new jobs or induce substantial unplanned population growth in the City. Additionally, the Project would be required to pay requisite development impact fees in accordance with Section 3.38.080, Park Improvements Residential Development Impact Fees, and Chapter 3.40, Dedication of Land for Park Facilities and Payment of In-Lieu Fees, of the Moreno Valley Municipal Code. Impacts would be **less than significant** in this regard.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Refer to Response XV.a) iv). The proposed Project includes recreational amenities for use by residents but would not include the construction or expansion of any public parks or recreational facilities. As described previously, the proposed Project would not increase the demand for parks or other recreational facilities and would not require the construction or expansion of any such facilities. This impact would be **less than significant**.

### Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. Transportation – Would the project:</b>				
a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:**

### Methodology

CEQA Guidelines §15064.3 was released on December 28, 2018, to address the significance for transportation impacts. The new guideline requires that the analysis is based on vehicle miles traveled (VMT) instead of congestion (such as level of service, or LOS). The change in the focus of transportation analysis is the result of legislation (SB 743) and is intended to shift the emphasis from congestion to, among other things, reducing GHG emissions, promoting a diversity of land uses, and developing multimodal transportation networks. Pursuant to CEQA Guidelines §15064.3(c), this change in analysis is mandated to be used beginning July 1, 2020. Refer to Response 4.17(b) below for the Project impacts relative to VMT.

However, as stated in the General Plan Circulation Element:

*Vehicle Miles Travelled (VMT) Vehicle Miles Travelled (VMT) is the state mandated performance metric for environmental analyses pursuant to the California Environmental Quality Act (CEQA) to describe the overall amount of travel in the City based on distance and is directly related to fuel consumption, air pollution, and GHG emissions. VMT is defined as the total mileage traveled by all vehicles. Although VMT relates specifically to automobiles, it is able to capture the effects of development patterns such as land use mix and density along with transit, bike, and pedestrian infrastructure improvements by reflecting their impacts on vehicle trip generation and trip lengths. The City will use a combination of LOS and VMT metrics to ensure the efficient movement of people and goods as well as reductions in GHG emissions.<sup>29</sup>*

<sup>29</sup> City of Moreno Valley General Plan 2040, Section 4, Circulation, p. 4-11, <https://moval.gov/cdd/documents/about-projects.html#moVal2040>

Because LOS is not an impact on the environment, it won't be analyzed here, except for how any roadway improvements required as a Condition of Approval for the Project, will be analyzed for conflicts with transit, pedestrian, and bicycle modes of travel.

### Existing Conditions

**Roadways.** Regional access to the Project site is provided by SR-60 to the north and I-215 to the west. Local access to the Project is provided by the following roadways:

- Moreno Beach Drive is oriented in the north-south direction and is a four-lane roadway within the Project study area, narrowing to a two-lane road north of the Project site. The City's circulation element designates Moreno Beach Drive as a "Divided Major Arterial." The speed limit on Moreno Beach Drive is 45 miles per hour. On-street parking is prohibited.
- Brodiaea Avenue is oriented in the east-west direction and is a two-lane roadway within the Project study area. The City's circulation element designates Brodiaea Avenue as a "Neighborhood Collector" roadway. The speed limit on Brodiaea Avenue is 35 miles per hour. On-street parking is prohibited.
- Alessandro Boulevard is oriented in the east-west direction and is a two-lane roadway within the Project study area. The City's circulation element designates Alessandro Boulevard as an "Divided Arterial" roadway. The speed limit on Alessandro Boulevard is 40 miles per hour. On-street parking is prohibited.

**Transit.** Public transportation services within the Project area include bus transit service provided by the Riverside Transit Agency (RTA). There are no transit routes that directly serve the Project site. The closest transit route to the Project is located on Moreno Beach Drive via Route 20. Route 20 provides transit service on Moreno Beach Drive within the Project area. Route 20 has a major stop at the intersection of Cactus Avenue and Moreno Beach Drive. Route 20 operates at 60- to 90-minute headways on weekdays and weekends.

**Pedestrian/Bicycle Facilities.** The City uses three types of bike path classifications, including Class I multi-use paths, Class II bicycle lanes, and Class III bicycle routes. There are existing bike lanes on Moreno Beach Drive Street within the Project area. Pedestrian circulation within the City is primarily provided via sidewalks. There are existing sidewalks on Moreno Beach Drive southwest of the Project site, however, no sidewalks are present on Brodiaea Avenue or on Moreno Beach Drive to the west and north of the Project site, and there are no sidewalks on Alessandro Boulevard. It should be noted that the City is proposing a Class II Bike Lane on Alessandro Boulevard from Kitching Street to Moreno Beach Drive, as well as a Class III Bike Route on Cottonwood Avenue from Nason Street to Moreno Beach Drive north of the Project site.

### Condition of Approval

The trip generation for the Project is based on trip generation rates from the Institute of Transportation Engineers' (ITE) Trip Generation (11<sup>th</sup> Edition) and are based on Land Use 210 "Single-Family Detached Housing." Based on Table 5 - Proposed Project Trip Generation of the Traffic Analysis, the Project is anticipated to generate 94 trips during the a.m. peak hour, 126 trips during the p.m. peak hour, and 1,264 daily trips.

As a **Condition of Approval**, the following Project-specific improvements shall be constructed as design features in conjunction with the development of the site to reduce transportation impacts relative to the City's traffic guidelines:

- Intersection 2: Brodiaea Avenue and Moreno Beach Drive. The Project's fair share percentage for each recommended improvement is identified in Table ES-2 in the Traffic Impact Analysis provided by TJW Engineering on February 27, 2025. The percentage of Project fair-share affected intersections was calculated using the total trips generated by the

Project divided by the total “new” traffic, which is the net increase in traffic volume in the Cumulative conditions as a result of all other proposed Projects. Improving the Intersection from a Two-Way Stop Control (TWSC) to a signalized intersection would ensure that the General Plan Policies C.-3-1, C. 3-3, and C. 3-5 are met.

The installation of a Two-Way Stop Control (TWSC) would not conflict with the Project’s ability to promote the use of transit, pedestrian, and bicycle facilities consistent with the SB 743 mandate to reduce VMT.

Brodiaea Avenue is classified as a Neighborhood Collector with an 80-foot right of way by the General Plan Map C-1, Circulation Diagram. Neighborhood Collectors are residential streets that prioritize low vehicle speeds and low-stress bicycle and pedestrian use on parallel routes to arterials. The Project will construct new pavement, curb, gutter, sidewalk, and parkway landscaping with its 40-foot width, half of the 80-foot right-of-way. These improvements would not conflict with the Project’s ability to promote the use of transit, pedestrian, and bicycle facilities consistent with the SB 743 mandate to reduce VMT. Impacts are **less than significant**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Changes to the CEQA Guidelines §15064.3 became effective July 1, 2020, which require all lead agencies to adopt VMT as a replacement for automobile delay-based LOS as the new measure for identifying transportation impacts for land use Projects. The City of Moreno Valley has prepared and adopted the City of Moreno Valley Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment in June 2020 to address changes to CEQA pursuant to SB 743 to include VMT analysis methodology, screening tools, and VMT thresholds.

For Projects that require a VMT analysis and do not screen out, the guidelines recommend using home-based VMT/Capita (HB-VMT/Capita) for residential Projects. The VMT analysis has been conducted using the RivTAM with City’s 2040 General Plan. Based on the City guidelines, this analysis includes the Project-generated VMT and Project effect on VMT for the following scenarios:

- Notice of Preparation (NOP) Baseline conditions;
- NOP Baseline plus Project conditions;
- Year 2040 without Project conditions; and
- Year 2040 plus Project conditions.

The City guidelines have established thresholds of significance for Project-generated VMT for use as part of the environmental review process under CEQA. The following would result in a significant Project generated VMT:

1. A Project would have a significant VMT impact if, in the NOP baseline plus Project scenario, its net VMT per capita exceeds the per capita VMT for Moreno Valley.
  - a) If a Project is consistent with regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence. If it is not consistent with the RTP/SCS, then it would have a significant VMT impact if its net VMT per capita exceeds the average VMT per capita for Moreno Valley for residential Projects.

The Project's effect on VMT compares how the Project changes VMT on the network looking at Citywide VMT and comparing it to the No Project condition. Based on data extracted from the "without Project" model, the City's VMT are the following:

- Base Year Model: VMT/Capita: 35.85
- Future Year Model: VMT/Capita: 36.46

**Project-Generated VMT Analysis**

NOP Year (2018) Conditions. The NOP Year VMT/Capita for the Project is 30.99 miles, while the City average is 35.85 miles. The Project-generated VMT does not exceed the City's VMT per capita. Therefore, the Project does not have a significant VMT impact based on the City's thresholds.

Year 2045 Conditions. The Year 2045 VMT/Capita for the Project is 27.44 miles, while the City average is 36.46 miles. The Project generated VMT does not exceed the City's VMT per capita. Therefore, the Project does not have a significant VMT impact based on the City's thresholds.

**Conclusion**

The Project generated VMT under NOP Year and Year 2045 with Project conditions does not exceed the City's VMT per capita. Therefore, based on the City's VMT thresholds, impacts would be **less than significant** in this regard.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The Project does not involve any unusual conditions or hazardous design features, such as sharp curves or dangerous intersections, or incompatible uses. As noted above, The Project will construct new pavement, curb, gutter, sidewalk, and parkway landscaping within a 40-foot-wide half right-of-way. The Project is also constructing a 53-foot wide driveway entrance off Brodiaea Avenue which meets the City's standard requirements. With implementation of the recommended configuration of the driveways and frontage improvements as part of the Project design, a **less than significant impact** would occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The access and circulation features on the Project site would accommodate emergency ingress and egress. Access to the Project site would be provided via a southern driveway that would be located on Brodiaea Avenue. The proposed site access improvements would ensure that access is maintained for fire trucks, police units, and ambulance/paramedic vehicles.

As part of the grading and building permit process, the City of Moreno Valley Public Works Department Transportation Engineering Division requires the contractor to submit a Traffic Control

Plan<sup>30</sup> for any work to be performed on a public street. The Traffic Control Plan ensures the safe movement of traffic and pedestrians through or around the work area and provides maximum protection and safety to construction workers. Impacts are **less than significant**.

**Mitigation Measures**

None required.

**Sources**

1. Brodiaea Avenue Traffic Impact Analysis (Traffic Analysis) prepared by TJW Engineering, Inc., dated July 25, 2025, provided as **Appendix I**.
2. Brodiaea Avenue Vehicle Miles Traveled (VMT) Analysis (VMT Analysis) prepared by TJW Engineering, Inc., dated July 25, 2025, provided as **Appendix J**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVIII. Tribal Cultural Resources – Would the project:</b>				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in <a href="#">Public Resources Code Section 21074</a> as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in <a href="#">Public Resources Code Section 5020.1(k)</a> , or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response:** As detailed previously in Section 5, *Cultural Resources*, based on the SCIC records search, literature and historical map review, historical society consultation, NAHC Sacred Lands File search, and cultural resources field survey, no historical resources were identified as defined by CEQA §15064.5(a) within the Project site. The proposed Project will not cause a substantial adverse change to any listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources .

However, in accordance with CEQA Guidelines §15064.5 and Public Resources Code §§21074 and 5020.1(k), previously undiscovered tribal cultural resources encountered during ground-disturbing activities may meet the definition of a historical resource if they are determined to be eligible for listing in a state or local register. Therefore, Mitigation Measures TCR-1 through TCR-3 below have been incorporated to ensure that any such resources are appropriately evaluated and treated in consultation with consulting tribal representatives and a qualified archaeologist.

30 City of Moreno Valley, Public Works Department, Transportation Engineering Division, Traffic Control, Traffic Control Plan General Notes: <https://www.moreno-valley.ca.us/departments/public-works/transportation/TrafficControlPlan-Notes.pdf>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of <a href="#">Public Resources Code section 5024.1</a> . In applying the criteria set forth in subdivision (c) of <a href="#">Public Resources Code section 5024.1</a> , the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response:** A request for tribal consultation was initiated by the City in May, 2025. Staff received responses from three tribes (Aqua Caliente, Rincon, and Pechanga). It should be noted that Pechanga was the only tribe to request formal consultation. Following various meetings and discussions with Pechanga, consultation was concluded in April, 2026. Per SB 18, tribal consultation is considered closed after final decisions by the governing body. To avoid impacting or destroying tribal cultural resources that may be inadvertently unearthed during the project’s ground disturbing activities, the following mitigation measures would be required:

**Mitigation Measures**

**MM TC-1 Native American Monitoring.** Prior to the issuance of a grading permit, the Developer shall secure agreements with Pechanga for tribal monitoring. The Developer is also required to provide a minimum of 30 days’ advance notice to the tribes of all ground-disturbing activities. The Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth-moving activities in the affected area in the event that suspected archaeological and cultural resources are unearthed. The Native American Monitor(s) shall attend the pre-grading meeting with the Project Archaeologist, the City, the construction manager, and any contractors and will conduct the Tribal Perspective of the mandatory Cultural Resources Worker Sensitivity Training to those in attendance.

**MM TCR- 2 Non-Disclosure of Reburial Locations.** It is understood by all parties that, unless otherwise required by law, the site of any reburial of Native American Tribal Cultural Resources (TCRs) shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act.

**MM TCR-3 Tribal Cultural Resource Disposition.** In the event that Native American cultural resources are discovered during the course of ground disturbing activities (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:

- a. One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Moreno Valley Planning Department:
  - i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place they were found with no development affecting the integrity of the resources.
  - ii. On-site reburial of the discovered items as detailed in the treatment plan required pursuant to Mitigation Measure CR 1. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed. No recordation of sacred items is permitted without the written consent of all Consulting

Native American Tribal Governments as defined in CR 3. The location for the future reburial area shall be identified on a confidential exhibit on file with the City, and concurred to by the Consulting Native American Tribal Governments prior to certification of the environmental document

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. Utilities and Service Systems – Would the project:</b>				
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response:** The Project site is served by the following utilities:

- Electricity – Moreno Valley Utilities (MVU)
- Water – Eastern Municipal Water District (EMWD)
- Sewer – EMWD
- Storm Drain – Riverside County Flood Control and Water Conservation District (RCFCWCD)
- Cable – Comcast
- Telephone – Verizon
- Natural Gas – Southern California Gas Company (SoCalGas)

**Electric Power, Natural Gas, and Telecommunications.** The Project site is located in a developed area of the City and is situated within close proximity to existing electric power, natural gas, and telecommunications facilities. Therefore, substantial new utility infrastructure would not be required with Project implementation.

**Water.** The Project would require water for the irrigation of landscaped areas. However, it is not expected that water demand would increase substantially with Project implementation. Water for the Project would be provided by EMWD and would connect to the existing water main located in adjacent roadways. Therefore, the expansion of off-site water facilities would not be required to serve the Project.

**Storm Drain.** The Project’s stormwater needs are met by the City of Moreno Valley and the Riverside County Flood Control and Water Conservation District. In the developed condition, a proposed storm drain system would convey runoff from the proposed residential development to a sediment basin within the proposed park and/or the detention/extended detention basin located in the southern portion of the Project site; refer to **Appendix K, Preliminary Water Quality Control Plan**. The basins would control outlet flows and provide runoff treatment and would have a bottom section that will be utilized as a BMP to treat the Design Capture Volume (DCV). Stormwater runoff would pond over a sand filter section to allow runoff to receive treatment. An outlet structure would be provided within the basin with orifice openings above the water quality water surface elevation to outlet 100- year storms to the proposed public right-of-way in Brodiaea Avenue. The outlet structure has been designed to decrease developed flows before discharging runoff to the street. Therefore, the expansion of off-site storm drain facilities would not be required to serve the Project.

**Wastewater Treatment.** The Project is located within the jurisdiction of the Santa Ana RWQCB, which applies requirements to the wastewater treatment facilities owned and operated by treatment providers. Sewer service is available from existing sewer lines in Brodiaea Avenue and Moreno Beach Drive. A sewer line would be installed throughout the Project in conveying wastewater to a

point of connection with the existing sewer line on Brodiaea Avenue. Therefore, the expansion of off-site wastewater facilities would not be required to serve the Project.

### Conclusion

The construction of the new onsite facilities and the offsite connections to existing facilities will result in ground disturbances that potentially impact Biological Resources, Cultural Resources, Paleontological Resources, and Tribal Cultural Resources. Therefore, the following mitigation measures are required:

- **MM BIO-1** Preconstruction Nesting Bird Survey
- **MM BIO-2** Preconstruction Burrowing Owl Survey
- **MM BIO-3** Preconstruction Bat Survey
- **MM CR-1** Archaeological Monitoring
- **MM CR-2** Cultural Resource Monitoring Plan (CRMP)
- **MM CR-3** Grading Plan Note (Halt Work)
- **MM CR-4** Inadvertent Finds
- **MM CR-5** Human Remains
- **MM CR-6** Archaeology Report - Phase III and IV
- **MM GEO-1** Paleontological Monitoring
- **MM TCR-1** Native American Monitoring
- **MM TCR-2** Non-Disclosure of Reburial Locations
- **MM TCR-3** Tribal Cultural Resource Disposition.

With the implementation of the above listed mitigation measures, impacts would be **less than significant**.

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

**Response:** Water service would be provided to the Project site by Eastern Municipal Water District (EMWD). The proposed Project would result in an increased demand for water supplies from the 134 single-family residential units. To provide a conservative estimate of Project water use, a generation rate derived from the most recent (2020) EMWD Urban Water Management Plan (UWMP) of 176 gallons per capita per day was used to estimate water demand from the Project.<sup>31</sup> As described in Section XIV, *Population and Housing*, the Project would increase the population by 334 persons above the original 159 persons projected, for a total of 493 persons. The water demand for 493 persons would be 73-acre feet per year (AF/YR). When compared to the water demand for the Project site under the existing General Plan land use designation, the increase would be 42 AF/YR. The 42 AF/YR increase represents an increase of 0.07% applied over the service area for EMWD.

As set forth in the EMWD's 2020 Urban Water Management Plan, EMWD has the ability to meet current and projected water demands through 2045 during normal, historic single-dry and historic multiple-dry year periods using imported water from Metropolitan with existing supply resources.

31 EMWD, 2020 Urban Water Management Plan, Table 5-2. DWR 5-2R 2020 Compliance, [https://content.emwd.org/sites/default/files/2024-07/urbanwatermanagementplan\\_0.pdf](https://content.emwd.org/sites/default/files/2024-07/urbanwatermanagementplan_0.pdf), accessed July 7, 2025.

Planned local supplies will complement imported supplies and improve reliability for EMWD and the region.<sup>32</sup>

In addition, EMVD issued a “SAN 53” letter dated November 6, 2024 (**Appendix L**), stating EMWD is willing to provide water & sewer services to the Project, contingent upon the developer completing the necessary arrangements in accordance with EMWD rules and regulations.

Based on the analysis above, impacts would be **less than significant**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** The proposed Project would receive wastewater conveyance services from the EMWD. Municipal wastewater is delivered to the one of EMWD’s five regional water reclamation facilities which treat 46 million gallons of wastewater per day (MGD), and currently treats approximately 49 MGD of wastewater at its four active regional water reclamation facilities.<sup>33</sup>

Given the available capacities at EMWD wastewater treatment plants, it is anticipated that the EMWD has available capacity to accommodate the anticipated wastewater generated from the new residences developed onsite. Based on EMWD’s 2015 Wastewater Collection System Master Plan, EMWD’s wastewater generation criteria used for regional planning is a rate of 235 gallons per day (GPD) per residential unit. Therefore, the Project would generate approximately 31,490 GPD.

EMWD has established a strategic goal of maximizing beneficial reuse of recycled water and frequently reuses 100 percent of the wastewater generated in its service area as recycled water. Because recycled water supply is dependent on wastewater generation and not precipitation, it is considered a nearly 100 percent reliable, drought-resistant supply. EMWD also has optimization efforts underway to improve operation of the recycled water system.

The Project, therefore, would generate about 31,490 gallons of wastewater per day (GPD) or 0.0314 MGD. Because the Project would only result in an increase of wastewater flows equal to 0.07 percent of current EMWD capacity.<sup>34</sup> Adequate capacity is available to serve the proposed Project. In addition, the receipt of a “will serve” letter from EMWD; payment of standard wastewater connection fees; and payment of ongoing user fees would ensure that the Project’s impacts on existing wastewater facilities are adequately offset. Impacts would be **less than significant**.

32 EMWD 2020 Urban Water Management Plan, page 7-7, [https://content.emwd.org/sites/default/files/2024-07/urbanwatermanagementplan\\_0.pdf](https://content.emwd.org/sites/default/files/2024-07/urbanwatermanagementplan_0.pdf), accessed July 7, 2025.

33 <https://www.emwd.org/what-we-do/wastewater-service>

34 <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Implementation of the Project is anticipated to generate additional solid waste during the temporary, short-term construction phase, as well as the operational phase, but it would not be expected to result in inadequate landfill capacity. According to the General Plan, the majority of solid waste generated within the City is disposed of at Badlands Sanitary Landfill, located at 31125 Ironwood Avenue in Moreno Valley. Two other landfills within the county of Riverside (El Sobrante Landfill and Lamb Canyon Landfill) also have the capacity to serve the City. According to the California Department of Resources Recycling and Recovery (CalRecycle), the combined maximum remaining capacity of these three landfills is approximately 332 million cubic yards.<sup>35</sup>

The Badlands Sanitary Landfill received approval in 2022 for a revised Solid Waste Facilities Permit (SWFP) SWIS No. 33-AA-0006, located The changes that will be authorized by the issuance of the proposed SWFP include: increasing the permitted maximum daily disposal tonnage from 4,500 to 5,000 tons per day; increasing the total permitted area from 278 to 811 acres; increasing the disposal area from 150 to 409 acres; increasing the design capacity from 34,400,000 to 82,300,000 cubic yards; increasing the maximum depth from 275 to 320 feet below grade surface; and updating the estimated closure year from 2026 to 2059.<sup>36</sup>

CalRecycle’s residential waste generation rates estimate a generation rate for 12.23 pounds of waste per household per day. Assuming 134 households, the Project would result in 1,638.8 pounds of waste daily.<sup>36</sup> Considering the capacity of the above-mentioned landfills, solid waste generated by the proposed Project could be accommodated by the landfills and would not have a significant impact on local landfill capacity.

All construction activities would be subject to conformance with relevant federal, state, and local requirements related to solid waste disposal. Specifically, the Project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939), which requires all California cities to “reduce, recycle, and re-use solid waste generated in the state to the maximum extent feasible.” The California Integrated Waste Management Act of 1989 requires that at least 50 percent of waste produced is recycled, reduced, or composted. The Project would also be required to demonstrate compliance with the Green Building Code, which includes design and construction measures that act to reduce construction-related waste through material conservation measures and other construction-related efficiency measures. Compliance with these programs would ensure the Project’s construction-related solid waste impacts are **less than significant**.

35 <https://www2.calrecycle.ca.gov/SolidWaste/Site/Details/2367>

36 <https://www2.calrecycle.ca.gov/SolidWaste/Site/Details/2367>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Response:** Refer to Response XIX.d). The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure. As such, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. A less than significant impact would occur.

**Mitigation Measures**

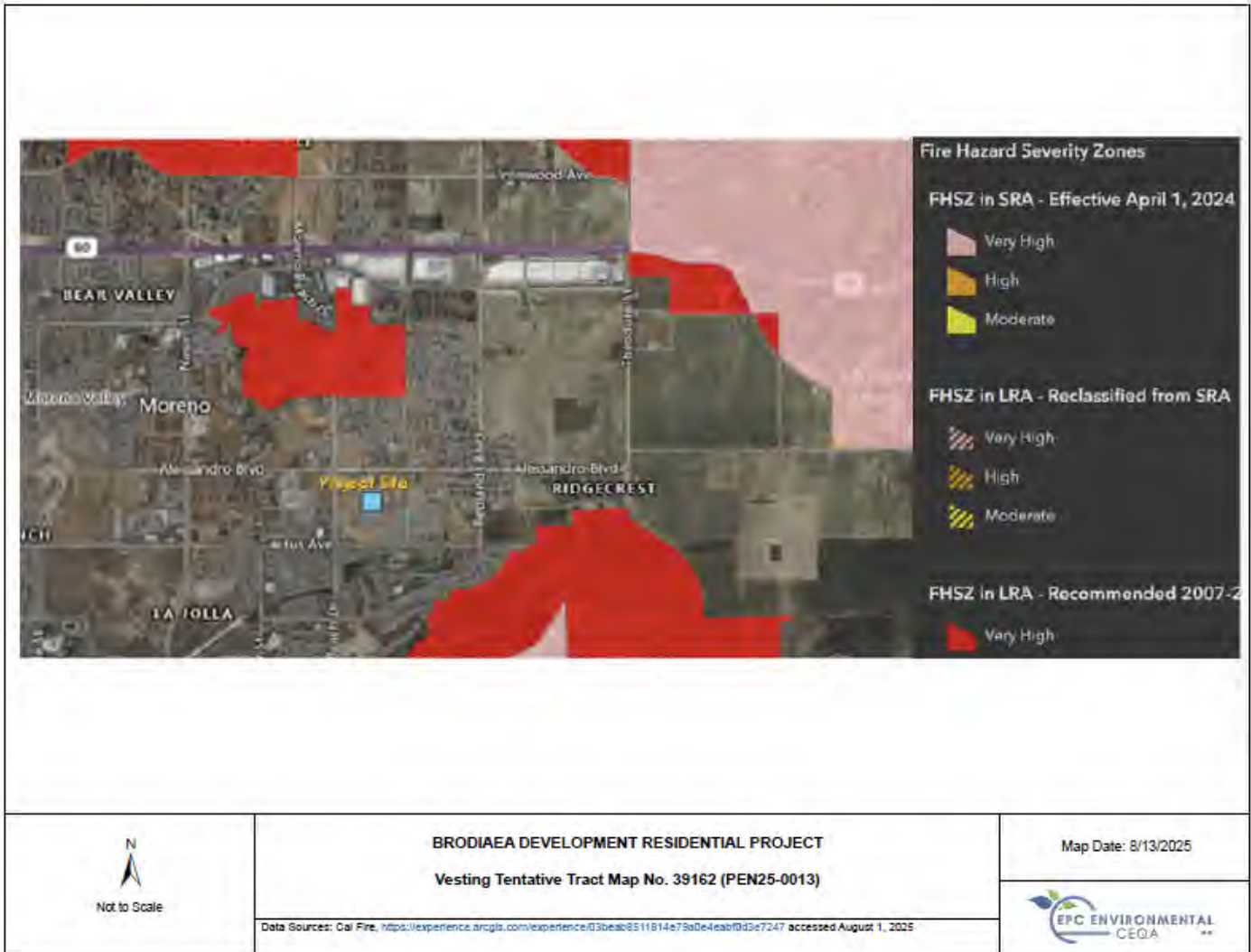
None required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XX. Wildfire</b> – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, <b>would the project:</b>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Response:** As shown in **Figure 12, Fire Hazard Severity Zones and Responsibility Areas**, the Project site is not in or near state responsibility areas or lands classified as very high fire hazard severity zones and no further discussion is required. There is **no impact**.

# Figure 11. Project Site Proximity to Fire Hazard Severity Zones and Responsibility Areas

Source: CAL FIRE, *Fire Hazard Severity Zone Viewer*, <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>, accessed August 4, 2025.



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XXI. Mandatory Findings of Significance</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response:** As discussed in in this ISMND, the construction of the Project would disturb undeveloped land that could impact Biological Resources, Cultural Resources, Paleontological Resources, and Tribal Cultural Resources. As such the following mitigation measures are required:

- **MM BIO-1** Preconstruction Nesting Bird Survey
- **MM BIO-2** Preconstruction Burrowing Owl Survey
- **MM BIO-3** Preconstruction Bat Survey
- **MM CR-1** Archaeological Monitoring
- **MM CR-2** Cultural Resource Monitoring Plan (CRMP)
- **MM CR-3** Grading Plan Note (Halt Work)
- **MM CR-4** Inadvertent Finds
- **MM CR-5** Human Remains
- **MM CR-6** Archaeology Report - Phase III and IV
- **MM GEO-1** Paleontological Monitoring
- **MM TCR-1** Native American Monitoring
- **MM TCR-2** Non-Disclosure of Reburial Locations
- **MM TCR-3** Tribal Cultural Resource Disposition.

With the implementation of the above-described mitigation measures, impacts would be **less than significant**.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Response:**

The cumulative impacts analysis provided below is consistent with §15130(a) of the CEQA Guidelines in which the analysis of cumulative effects of a project is based on two determinations:

- 1) *Is the combined impact of this project and other projects significant? If so,*
- 2) *Is the project’s incremental effect cumulatively considerable, causing the combined impact of the projects evaluated to become significant?*

The cumulative impact must be analyzed **only** if the combined impact is significant, and the project's incremental effect is found to be cumulatively considerable (CEQA Guidelines 15130(a)(2) and (3)).

## **Biological Resources**

As discussed in Section IV, *Biological Resources*, of this Initial Study, future development of the Project will impact on the general biological resources present on the site, and all the vegetation will be removed during future construction activities. The following species were identified as having a "Moderate Potential" to occur on the Project Site in the future and are further discussed below:

### **Burrowing Owl**

Focused BUOW surveys were conducted in March, April, May, and June 2025 following the MSHCP survey protocol, Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan Area. No burrowing owls, sign (i.e., pellets, feathers, castings, or whitewash), occupied burrows, or remnant burrows were observed. However, the Project site is sparsely vegetated with a variety of low-growing plant species that allow for open line-of-sight and foraging opportunities for BUOW. In accordance with the Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area, if BUOW habitat occurs on-site, focused surveys and pre-construction clearance surveys are required per **Mitigation Measures MM BIO-1, Preconstruction Burrowing Owl Survey**, to ensure potential impacts to burrowing owls are reduced to a **less than significant** level by requiring a pre-construction survey prior to ground-disturbing activities.

### **Western Mastiff Bat and Western Yellow Bat**

The Project site and buffer area offer potential foraging and roosting habitat for bats, which are found throughout Southern California and may use the area despite significant disturbance. No bats were observed during surveys, but their presence under similar conditions is documented. The proposed Project will implement **Mitigation Measures BIO-2, Pre-construction Bat Survey**.

There was no sensitive natural communities, riparian habitat, wetlands, present on the Project site. Additionally, the Project was found to be consistent with the Western Riverside County Multiple Species Habitat Conservation Plan (WR-MSHCP) and species covered by the WR\_MSHCP would not be impacted, except for the Burrowing owl discussed above.

### **Nesting Birds**

There are some shrubs and trees that could provide nesting opportunities for bird and **Mitigation Measure MM BIO-3, Preconstruction Nesting Bird Survey**, is required that potential impacts are less than significant.

Based on the preceding analysis, the Project's impacts **would not be cumulatively considerable**.

## **Cultural Resources**

As discussed in Section V, *Cultural Resources*, of this Initial Study, the records search and field survey did not identify any cultural resources, including historic and prehistoric sites or historic - period buildings within the Project site boundaries. Specifically, the former farmstead on the Project site does not meet any of the criteria for listing in the California Register of Historical Resources. Therefore, it does not qualify as a "historical resource" in the category of "discretionary historical resources."

Additionally, the field survey failed to indicate sensitivity for buried cultural resources. No additional cultural resources work, or monitoring is necessary during proposed activities associated with the identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation, if necessary, as required by **Mitigation Measures MM CR-1- Archaeological Monitoring ,MM CR-2- Cultural Resource**

Monitoring Plan (CRMP), **MM CR-3-Grading Plan Note (Halt Work)**, **MM CR-4- Inadvertent Finds**, **MM CR-5-Human Remains**, and **MM CR-6 -Archaeology Report - Phase III and IV**.

Based on the preceding analysis, the Project’s impacts **would not be cumulatively considerable**.

**Geology and Soils (Paleontological Resources)**

As discussed in Section VII, *Geology and Soils*, of this Initial Study, according to the CRM TECH Paleontological Resources Assessment, dated March 16, 2025 (**Appendix D**) potentially fossil-bearing units are present in the Project area and the Project area has a high potential to disturb paleontological resources within undisturbed bedrock. Mitigation Measure **MM GEO-1-Paleontological Monitoring** is required.

Based on the preceding analysis, the Project’s impacts **would not be cumulatively considerable**.

**Tribal Cultural Resources**

As discussed in Section XVIII, *Tribal Cultural Resources*, of this Initial Study, construction and operation of the Project would include activities limited to the confines of the Project site. The tribal consultation conducted with the Pechanga has determined that the Project is unlikely to adversely affect tribal cultural resources with implementation of Mitigation Measures TCR-1 through TCR-3. Based on the preceding analysis, the Project’s impacts **would not be cumulatively considerable**.

**Utilities and Service Systems**

As discussed in Section XIX, *Utilities and Service Systems*, of this Initial Study, the installation and construction of the sewer, water, storm drainage facilities described below will result in ground disturbances that may impact Biological Resources, Cultural Resources, Geology and Soils (Paleontological Resources), and Tribal Cultural Resources. Potential impacts to these resources are mitigated by Mitigation Measures **MM BIO-1 through MM BIO-3, MM CR-1 through MM CR-6, MM GEO-1, and MM TCR-1 through TCR-3**.

Based on the preceding analysis, the Project’s impacts **would not be cumulatively considerable**.

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

**Response:** The proposed Project does not have the potential to cause substantial adverse effects to humans, either directly or indirectly as shown throughout this Initial Study. In many cases, compliance with mandatory requirements promulgated by the California Building Code and the Moreno Valley Planning and Zoning Code ensured that impacts would be **less than significant**.

## Mitigation Monitoring and Reporting Program

the California Environmental Quality Act (CEQA), when a project is approved with a Mitigated Negative Declaration identifying potential environmental impacts, the lead or public agency must implement a reporting or monitoring program. This program ensures that any required changes to the project are implemented to mitigate or avoid significant environmental effects as stated in Public Resources Code §21081 and §21081.6.

A Mitigation Monitoring and Reporting Program (MMRP) is required for projects where adopted mitigation measures are successfully implemented for the proposed 134 Unit Vesting Tentative Tract Map No. 39162). The City of Moreno Valley is the Lead Agency for

the Project and is responsible for the implementation of the MMRP. This report describes the MMRP for the Project and identifies the responsible parties that will be responsible for monitoring the implementation of the individual mitigation measures in the MMRP. Mitigation, Monitoring and Reporting Program

The MMRP will be active throughout all project phases—design, construction, and operation (if required). The attached table lists the required mitigation measures, their timing, responsible parties, and space for the compliance monitor to confirm completion. As each measure is completed, the compliance monitor will sign and date the MMRP to document fulfillment.

No.	Mitigation Measure	Responsible Party	Monitoring Action	Enforcement Agency Monitoring Agency Monitoring Plan
D-1	<b>Preconstruction Nesting Bird Survey:</b> If work occurs within nesting bird season (February 1 to August 30), a qualified biologist will be required to conduct a pre-construction nesting bird survey within 7 days of construction. The survey will include the entire Project area and surrounding 500 feet. If any active nests are found, a construction buffer will be established, 300 feet for passerines and 500 feet for raptors and listed birds. A biologist will monitor the active nest once a week until nesting has ceased, or the fledglings have fledged.	Project Applicant and qualified Biologist	Field Verification	City of Moreno Valley Prior to Construction
D-2	<b>Preconstruction Burrowing Owl Survey:</b> A CDFW protocol pre-construction burrowing owl survey will be completed by a qualified biologist within 30 days of construction start. If it is determined that burrowing owls are nesting or utilizing the site, work must cease and a burrowing owl plan consistent with CDFW's Staff Report on Burrowing Owl Mitigation (CDFW 2012) will be prepared. The plan will identify burrowing owl habitat that is being disturbed, and avoidance measures including construction buffer. Consultation with CDFW will be required if relocation of any burrowing owl is necessary.	Project Applicant and qualified Biologist	Field Verification	City of Moreno Valley Prior to Construction
D-3	<b>Preconstruction Bat Survey:</b> Within 30 days prior to construction, a pre-construction survey must be completed by a qualified biologist to determine the presence of bats within	Project Applicant and qualified Biologist	Field Verification	City of Moreno Valley Prior to Construction

No.	Mitigation Measure	Responsible Party	Monitoring Action	Enforcement Agency Monitoring Agency Monitoring Plan
	and adjacent to the Project site. The focus of the surveys should be on the abandoned structures on site and surrounding trees. If any signs or individuals of special-status bats are identified, a bat management plan will be drafted that outlines additional surveys and additional measures to avoid impacting the special-status bat species			

**Cultural Resources**

R-1	<b>Error! Reference source not found.</b>	Project Applicant and qualified archaeologist	In Field Review	City of Moreno Valley During Construction
R-2	<b>Cultural Resource Monitoring Plan (CRMP).</b> The Project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a CRMP in consultation pursuant to the definition in 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 AB52 tribal consultation process for the Project, has not opted out of the AB52 consultation process, and has completed AB52 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: <ul style="list-style-type: none"> <li>a. Project description and location;</li> <li>b. Project grading and development scheduling;</li> <li>c. Roles and responsibilities of individuals on the Project;</li> <li>d. The pre-grading meeting and Cultural Resources Worker Sensitivity Training details;</li> <li>e. The protocols and stipulations that the contractor, City, Consulting Tribe (s), and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation;</li> <li>f. The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items;</li> <li>g. Contact information of relevant individuals for the Project.</li> </ul>	Project Applicant and qualified archaeologist	Prior to the issuance of a grading permit	City of Moreno Valley During Plan Construction

No.	Mitigation Measure	Responsible Party	Monitoring Action	Enforcement A Monitoring Ag Monitoring PI
R-3	<p><b>Grading Plan Note (Halt Work).</b> The City shall verify that the following note is included on the Grading Plan:            "If any suspected archaeological and cultural resources are discovered during ground-disturbing activities and the Project Archaeologist or Native American Tribal Representatives are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Tribal Representatives to the site to assess the significance of the find."</p>	Project Applicant	Prior to the issuance of a grading permit	City of Moreno V During Plan C
R-4	<p><b>Inadvertent Finds.</b> If potential historic or cultural resources are uncovered during excavation or construction activities at the project site (Project/location) that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval;</p> <ol style="list-style-type: none"> <li>1. All ground-disturbing activities in the affected area within 100 feet of the uncovered resource must cease immediately until a meeting is convened between the developer, project archeologist who is 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.</li> <li>2. The developer shall call the City or their designee immediately upon discovery of the cultural resource to convene the meeting.</li> <li>3. At the meeting with the aforementioned parties, the significance of the discoveries shall be discussed and as appropriate recommend alternative measures to avoid, minimize or mitigate negative effects on the historic, or prehistoric resource.</li> <li>4. Further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be</li> </ol>	Project Applicant and qualified archaeologist	In Field Review	City of Moreno V During Constru

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	<p>allowed to continue outside of the buffer area and will be monitored by additional archeologists and Tribal Monitors, if needed.</p> <p>5. Determinations and recommendations by the consultant shall be immediately submitted to the Planning Division for consideration and implemented as deemed appropriate by the Community Development Director, in consultation with the State Historic Preservation Officer (SHPO) and any and all Consulting Native American Tribes as defined in CR 2 before any further work commences in the affected area.</p> <p>6. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.</p>			
R-5	<p><b>Human Remains.</b> If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the “most likely descendant”. The “most likely descendant” shall then make recommendations and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective 23.3, CEQA). <b>No photographs are to be taken except by the coroner, with written approval by the consulting Tribe(s).</b></p>	Project Applicant and qualified archaeologist	In Field Review	City of Moreno V During Constru
R-6	<p><b>Archaeology Report - Phase III and IV.</b> Prior to final inspection, the developer/permit holder shall prompt the Project Archaeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies</p>	Project Applicant and qualified archaeologist	Prior to issuance of occupancy permits	City of Moreno V During final insp

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	with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the South Coastal Information Center (SCIC) at the San Diego State University (SDSU), and one (1) copy shall be submitted to each of the Consulting Tribe(s) Cultural Resources Department(s).			

**Geology and Soils**

O-1	<p><b>Paleontological Monitoring.</b> In accordance with the provisions of CEQA (Scott and Springer 2003) as well as the proposed guidelines of the Society of Vertebrate Paleontology (2010), including but not be limited to the following components:</p> <ul style="list-style-type: none"> <li>▪ Earth-moving operations within the Project area should be monitored periodically, or "spot-checked," by the qualified paleontological monitor to ensure the timely identification of previously undisturbed, potentially fossiliferous sediments when they are encountered. Once the depth of three feet is reached, or if potentially fossiliferous sediments are exposed sooner, all further earth-moving operations will need to be monitored continuously. The monitor should be prepared to quickly salvage fossil remains as they are unearthed to avoid construction delays. However, the monitor must have the power to temporarily halt or divert grading equipment to allow for the removal of abundant or large specimens.</li> <li>▪ Samples of potentially fossiliferous sediments should be collected and processed to look for and recover small fossils that may be present.</li> </ul>	Project Applicant and qualified paleontologist	In Field Review	City of Moreno V During Constru
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No.	Mitigation Measure	Responsible Party	Monitoring Action	Enforcement A Monitoring Ag Monitoring P
	<ul style="list-style-type: none"> <li>All recovered paleontological specimens should be identified to the lowest taxon possible and curated at a repository with permanent retrievable storage.</li> <li>A report of findings, including an itemized inventory of any recovered specimens, should be prepared upon completion of the procedures outlined above. The report should include a discussion of the significance of the paleontological findings, if any. The re/port and the inventory, when approved by the City of Moreno Valley, will signify completion of the mitigation program.</li> </ul>			

### Cultural Resources

R-1	<p><b>Native American Monitoring.</b> Prior to the issuance of a grading permit, the Developer shall secure agreements with Pechanga for tribal monitoring. The Developer is also required to provide a minimum of 30 days' advance notice to the tribes of all ground-disturbing activities. The Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth-moving activities in the affected area in the event that suspected archaeological and cultural resources are unearthed. The Native American Monitor(s) shall attend the pre-grading meeting with the Project Archaeologist, the City, the construction manager, and any contractors and will conduct the Tribal Perspective of the mandatory Cultural Resources Worker Sensitivity Training to those in attendance.</p>	Project Applicant	Prior to the issuance of a grading permit	City of Moreno V During Plan C
R-2	<p><b>Non-Disclosure of Reburial Locations.</b> It is understood by all parties that, unless otherwise required by law, the site of any reburial of Native American Tribal Cultural Resources (TCRs) shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act.</p>	Project Applicant and City of Moreno Valley	Prior to the issuance of occupancy permits	City of Moreno V During final insp
R-3	<p><b>Tribal Cultural Resource Disposition.</b> In the event that Native American cultural resources are discovered during the course of ground disturbing activities (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:</p>	Project Applicant and archaeologist	In Field Review	City of Moreno V During Constru

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	<p>a. One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Moreno Valley Planning Department:</p> <p>i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place they were found with no development affecting the integrity of the resources.</p> <p>ii. On-site reburial of the discovered items as detailed in the treatment plan required pursuant to Mitigation Measure CR 1. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed. No recordation of sacred items is permitted without the written consent of all Consulting Native American Tribal Governments as defined in MM CR- 2, Cultural Resource Monitoring Plan (CRMP). The location for the future reburial area shall be identified on a confidential exhibit on file with the City, and concurred to by the Consulting Native American Tribal Governments prior to certification of the environmental document.</p>			