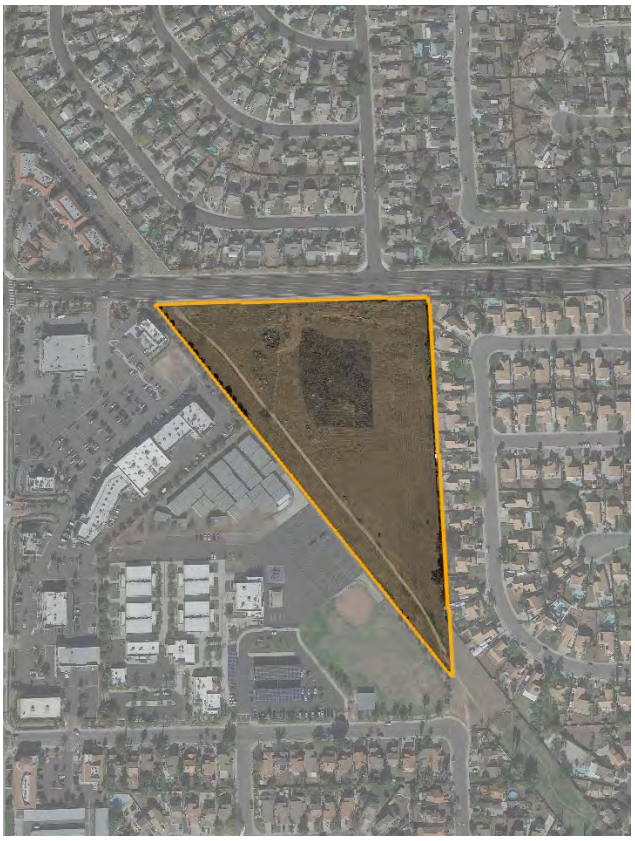
CITY OF MORENO VALLEY

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR IRIS PARK PROJECT



Iris Park Project - Case Numbers PEN20-0063, PEN20-0065, PEN20-0066, PEN20-0067, PEN20-0068

October 20, 2020

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

Prepared By
EPD Solutions, Inc.
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INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) FOR IRIS PARK

MITIGATED NEGATIVE DECLARATION

Project Name: Iris Park

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

Mitigation measures necessary to avoid the potentially significant effects on the environment are included in the attached Initial Study, which is hereby incorporated and fully made part of this Mitigated Negative Declaration. The City of Moreno Valley has hereby agreed to implement each of the identified mitigation measures, which would be adopted as part of the attached Mitigation Monitoring and Reporting Program.

BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. **Project Case Number(s):** PEN20-0063, PEN20-0065, PEN20-0066, PEN20-0067, PEN20-0068

2. **Project Title:** Iris Park

3. **Public Comment Period:** October 23, 2020 through November 11, 2020

4. **Lead Agency:** City of Moreno Valley
   Julia Descoteaux, Planning Department
   14177 Frederick Street
   Moreno Valley, California 92552
   (951) 413-3209
   juilad@moval.org

5. **Documents Posted At:** A copy is available at City Hall

6. **Prepared By:** Konnie Dobreva, JD, Director of Environmental Planning
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7. **Project Sponsor:**

Applicant/Developer	**Property Owner**
Pacifica Investments	Maple Lane Group, LLC
333 City Boulevard West	2005 Winston Court
Suite 1700	Upland, California 91784
Orange, California 92868	

8. **Project Location:** The project site is located southeast of the intersection of Iris Avenue and Perris Boulevard and directly south of the intersection of Iris Avenue and Wedow Drive in the city of Moreno Valley at Assessor's Parcel Number 312-020-025, and southeast of the southeasterly corner of Iris Avenue and Perris Boulevard. Moreno Valley is located in Riverside County and encompasses approximately 52 square miles of land. It is bounded by the city of Riverside to the east; the city of Perris to the south; the San Jacinto mountains to the east; and the cities of Redlands and San Bernardino to the north.

   As shown on Figure 1, Regional Location, regional access to the project site is provided by Interstate 215 (I-215). Iris Avenue provides local access to the project site. The project site is located in Section 29, Township 3 South, Range 3 West, San Bernardino Baseline and Meridian, and is mapped on the U.S. Geological Survey (USGS) Sunnymead 7.5' topographic quadrangle.

9. **General Plan Designation:** Residential (5 du/ac) and Commercial

Residential 5: The primary purpose of areas designated Residential 5 is to provide for single-family detached housing on standard sized suburban lots.

Commercial: The primary purpose of areas designated Commercial is to provide commercial properties and distribute commercial areas citywide to encourage walking and bicycling.

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

11. **Existing Zoning:** Residential 5 District (R5) and Community Commercial (CC)

Residential 5 District: The primary purpose of the R5 district is to provide for residential development on common sized suburban lots. This district is intended as an area for development of single-family residential and mobile home subdivisions at a maximum allowable density of 5 du/ac, as indicated in Section 9.03.020 of the Municipal Code.

Community Commercial: The primary purpose of the community commercial (CC) district is to provide for the general shopping needs of area residents and workers with a variety of business, retail, personal and related or similar services.

To implement the proposed development, the project includes a General Plan Amendment to change the Land Use designation of the site from Residential: Max. 5 du/ac (R5) and Commercial (C) to Residential: Max. 10 du/ac (R10) and a Change of Zone to reclassify the site from Residential 5 (R5) District and Community Commercial (CC) District to Residential Single-Family 10 (RS10) District.

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

	Land Use	General Plan	Zoning
Project Site	**Vacant**	**Residential: 5 max du/ac (R5) Commercial (C)**	**Residential 5 (R5) District Community Commercial (CC) District**
North	Single-Family Residential	Residential: Max. 5 du/ac (R5)	Residential 5 (R5) District
South	Single-Family Residential	Residential: Max. 5 du/ac (R5) Residential: Max. 10 du/ac (R10)	Residential 5 (R5) District Residential 10 (R10) District
East	Single-Family Residential	Residential: Max. 5 du/ac (R5)	Residential 5 (R5) District
West	Commercial Shopping Center, Val Verde Academy	Commercial (C) Residential: Max. 5 du/ac (R5)	Community Commercial (CC) District Residential 5 (R5) District

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

Environmental Setting

The approximately 10.82-acre project site consists of one parcel (Assessor's Parcel Number 312-020-025) and is a vacant lot. A 100-foot-wide easement in favor of the State of California for the California Aqueduct is located along the western edge of the site, covering 3.02 acres. Vehicular access to the site is provided by Iris Avenue. The perimeter

of the site is partially secured by wall sand fencing on adjacent properties along the eastern, western, and southern portions of the site.

Vegetation on the site consists of a light moderate to growth of weeds. The topography of the site is relatively flat, with a very gentle fall towards the southeast. The project site is located within a relatively flat valley, with elevations averaging approximately 1496 feet above mean sea level. Figure 1, *Aerial View*, provides an aerial of the existing project site.

Project Description

Project Characteristics

The Iris Park project ("project" or "proposed project") would construct 81 new single-family residences, as well as onsite roadways, sidewalks, a detention basin, common open space, and private open space areas on the project site. Figure 6, Conceptual Site Plan, illustrates the proposed site configuration following project implementation.

The proposed project site totals approximately 10.82 acres in size, which includes the 100-foot-wide California Aqueduct easement on the western portion of the site. In conjunction with the project, the City intends to construct a public park along this easement. The proposed public park would include landscaping and an extension of the existing trail located along segments of the California Aqueduct easement in the city.

To implement the proposed development, the project includes a General Plan Amendment to change the Land Use designation of the site from Residential: Max. 5 du/ac (R5), which currently composes approximately 9.87 acres on the site, and Commercial (C), which currently composes approximately 0.95 acres on the site, to Residential: Max. 10 du/ac (R10); a Change of Zone to reclassify the site from Residential 5 (R5) and Community Commercial (CC) to Residential Single-Family 10 (RS10); a Tentative Tract Map (TTM 37909) to subdivide the project site into 81 lots; and a Conditional Use Permit for a Planned Unit Development.

Project Features

The proposed residential development would include 81 single-family residences on the 10.82-acre project site, yielding a density of 7.48 du/acre. Residential lots would range from 2,197 SF to 4,741 SF. The single-family residences would range in size from 1,848 square feet (SF) to 2,201 SF, with 3-bedroom to 5-bedroom floor plans, private yards, and two-car garages. Overall, the project proposes a total residential building footprint of 164,549 SF. The minimum residential lot area would be 2,250 SF, with a range from 2,250 SF to 4,293 SF. Table 1 below provides a breakdown of the proposed development features on the project site.

Table 1. Proposed Development

Floor Plan Type	Percent of the project site	No. of Plans`	Total Livable Area (SF)
3 bedroom/2.5 bath	30%	26	48,048
4 bedroom/2.5 bath	30%	23	46,069
4 bedroom/3 bath	40%	32	70,432
Totals:	**100%**	**81**	**164,549**

The project also proposes to construct common open space areas, private open space areas, and a detention basin, as detailed in Table 2 below. A 17,996 square-foot common open space area is proposed within the northeastern portion of the residential development and would include landscaping, walkways, and seating areas. Smaller open space areas, including a 4,619 square-foot fitness park, would be located along the western edge of the site, adjacent to the California Aqueduct easement. The easement itself would provide a trail and landscaped areas. New walkways are also proposed throughout the residential development. The project would provide private yards within the single-family residential lots.

Table 2. Proposed Open Space

Description	**Area (SF)**
Common Open Space	29,185
Private Open Space	51,572
Total	**80,757**

New 6-foot high walls would be constructed along the northern boundary of the site adjacent to Iris Avenue, in addition to new 4-foot high tubular steel fencing along the western boundary of the site adjacent to the California Aqueduct easement. The existing fence along the eastern boundary of the site would remain. The proposed residential project will have a gated entry along Iris Avenue, with a gate set back sixty feet from the street.

Architectural Design

The proposed two-story single-family residences would include three different architectural styles to provide aesthetic variation throughout the community. The single-family residences would be designed with various architectural elements, multi-level rooflines, and an earth tone color scheme. In addition, the residences would incorporate stucco finishes, detailed roof elements, awnings, metal railings, and decorative windows and doors in the exterior design. Enhanced elevations would be incorporated where building sides or rears are visible from streets. The tallest roofline of the two-story residences would be less than 30 feet in height.

Access and Circulation

Vehicular access to the project site would be provided via two gated driveways on Iris Avenue, which would provide access to the community's internal roadways. The proposed residential project will have a gated main entrance along Iris Avenue, with a gate set back sixty feet from the street and a secondary gated access point off of Iris Avenue. The main entrance area will have a turnaround area before the gate and will feature a storage lane for visitors to use a call box for permission to enter the community. The single-family residences would be accessed by private driveways along the internal roadways, as shown on Figure 6, *Conceptual Site Plan*. The project also includes pedestrian paths to provide for non-vehicular on-site circulation and for connection to existing sidewalks and bike lanes adjacent to the proposed project.

Parking

The proposed project would provide garage, driveway, and on-street parking. Each residence would have a two-car garage. The project would also provide 49 on-street parking spaces. Table 3 shows the parking to be provided by the project.

Table 3. Proposed Parking

Type of Parking	Required	Provided
Enclosed Parking Spaces	162	162
Guest Parking	41	49
Total Parking Spaces Provided	203	211
Parking to Unit Ratio		2.6/dwelling unit

Recreation and Open Space

The project includes the development of 29,185 SF of common open space. As part of the common open space, a 17,996 SF community park is proposed within the northeastern portion of the project site, and a 4,619 SF fitness park is proposed within the western portion of the project site. The community park would provide amenities for future residents, such as walking paths, seating areas, picnic tables, and a group shade structure with picnic tables and communal barbeques. The fitness park would provide four community fitness stations, picnic benches, and walking paths The project includes connections to a future public linear park, to be developed by the City, along the California Aqueduct easement. The future linear park would provide walking trails and landscaped areas. Figure 7, *Conceptual Landscape Plan,* illustrates the proposed recreational and open space areas within the project.

Landscaping

Landscaping proposed as part of the project would consist of drought-tolerant ornamental trees, shrubbery, and groundcover. Turf would be provided in active use areas in common open spaces. In total, the project would include 67,646 SF of total landscaping on the project site. The landscape plan would be consistent with the City's landscape and irrigation design standards, as provided in Section 9.17.030 of the City's Municipal Code.

Landscaping improvements would also be provided along Iris Avenue to City standards, which would include a 10-foot landscape setback between then existing sidewalk on Iris Avenue and the proposed community wall along the northern portion of the site. The street trees within the setback would consist of 36-inch and 24-inch ornamental box trees to enhance the frontage on Iris Avenue and allow for additional privacy within the proposed community. In addition, the roadway entrances into the proposed residential community would include decorative pavement, as well as decorative signage and matching height palm trees to aesthetically enhance the entrance to the residential community.

Overall, landscaping throughout the complex would be consistent and provide a cohesive design. Landscaping improvements at the perimeter of the complex are intended to integrate the proposed project with the surrounding neighborhood context and streetscape character. Figure 7, *Conceptual Landscape Plan*, illustrates the proposed landscape areas and landscape pallet.

Lighting

Outdoor lighting included as part of future development on the project site would be typical of single-family residential uses and would consist of wall-mounted lighting as well as pole-mounted lights along the proposed internal roadways. Nighttime lighting would be used as accent/security lighting in the park area. All of the project's outdoor lighting would

be directed downward and shielded to minimize off-site spill. The location of all exterior lighting would comply with lighting standards established in the City's Municipal Code.

Infrastructure Improvements

Water and Sewer

The proposed project would install new sewer lines within the project's proposed onsite streets that would connect to the existing sewer manholes and 18-inch sewer line in the 100-foot wide easement to the west. The project would also install new water lines within the project's proposed onsite streets that would connect to the existing 12-inch water line in Iris Avenue.

Drainage

In the existing condition, the topography of the project site is planar, with a small elevation change towards the southeast. Thus, the project site's current surface runoff flows generally as sheet flow to the south-southeast. In the developed condition, the project site would consist of several drainage sub-areas where storm flows would flow towards the proposed internal roadways and would ultimately be conveyed to the proposed infiltration basin system within the southeast corner of the property. The infiltration basin would be installed within the proposed landscape area onsite adjacent to the easement areas along the westerly portion of the property and would discharge to the existing point of discharge within the existing easements.

SUBDIVISION

As part of the project, TTM 37858 would be required to subdivide the existing parcel (APN 312- 020-025) to create 81 residential lots, as shown on Figure 8, *Tentative Tract Map*. The project site would consist of the residential development and associated infrastructure. Existing parcels in the project vicinity would not be impacted by the proposed parcel reconfiguration.

GENERAL PLAN AND ZONING

The project site currently has existing General Plan land use designations of Residential: Max. 5 du/ac (R5) and Commercial (C). As part of the project, a General Plan Amendment is proposed to change the designation of the site to Residential: Max. 10 du/ac (R10), which would allow the proposed single-family residences at a density of approximately 7.58 du/acre. In addition, the project site currently has zoning designations of Residential 5 (R5) District and Community Commercial (CC) District. As such, the project includes a zone change to Residential Single-Family 10 (RS10) to implement the proposed single-family residential uses. Section 9.03.020 of the City's Municipal Code states that the Residential Single-Family 10 District (RS10) zoning district is to provide for residential development on small single-family lots with amenities not generally found in suburban subdivisions. The district is intended for subdivisions at a maximum allowable density of 10 dwelling units per net acre.

Following approval of the General Plan Amendment and zone change, the land use designation and zoning classification associated with the project site would be consistent with the proposed use. As a result of project implementation, all other land use designations and zoning classifications in the project vicinity would remain the same as under existing conditions. Any General Plan Amendment or zone change proposed as

part of a future project (that is subject to discretionary approval) would be subject to separate environmental review on a project-specific basis, in accordance with the provisions of CEQA and the State CEQA Guidelines.

Table 4. Current General Plan Designation and Zoning Designation

Current General Plan Designation	Current Zoning Designation	Acreage
Residential: Max 5 du/ac (R5)	Residential 5 (R5) District	9.87
Commercial (C)	Community Commercial (CC) District	0.95

CONSTRUCTION DURATION AND ZONING

Construction activities include demolition of the existing structures, pavement, and the existing utility infrastructure; grubbing, grading, excavation and re-compaction of soils; utility and infrastructure installation; building construction; roadway pavement; and architectural coatings. Approximately 6,042 cy of soil is proposed to be exported during grading activities.

Construction activities for the project would occur over 26 months and would begin in 2021 with the opening for project occupancy in 2023. Construction activities would occur in the following stages: site preparation, grading, building construction, architectural coating, and paving. Pursuant to the Chapter 11.80.030 of the Moreno Valley Municipal Code, construction activities would be limited to between the hours of 7:00 a.m. to 8:00 p.m. Monday through Friday, excluding holidays unless written approval is obtained from the City Building Official or City Engineer.

DISCRETIONARY APPROVALS

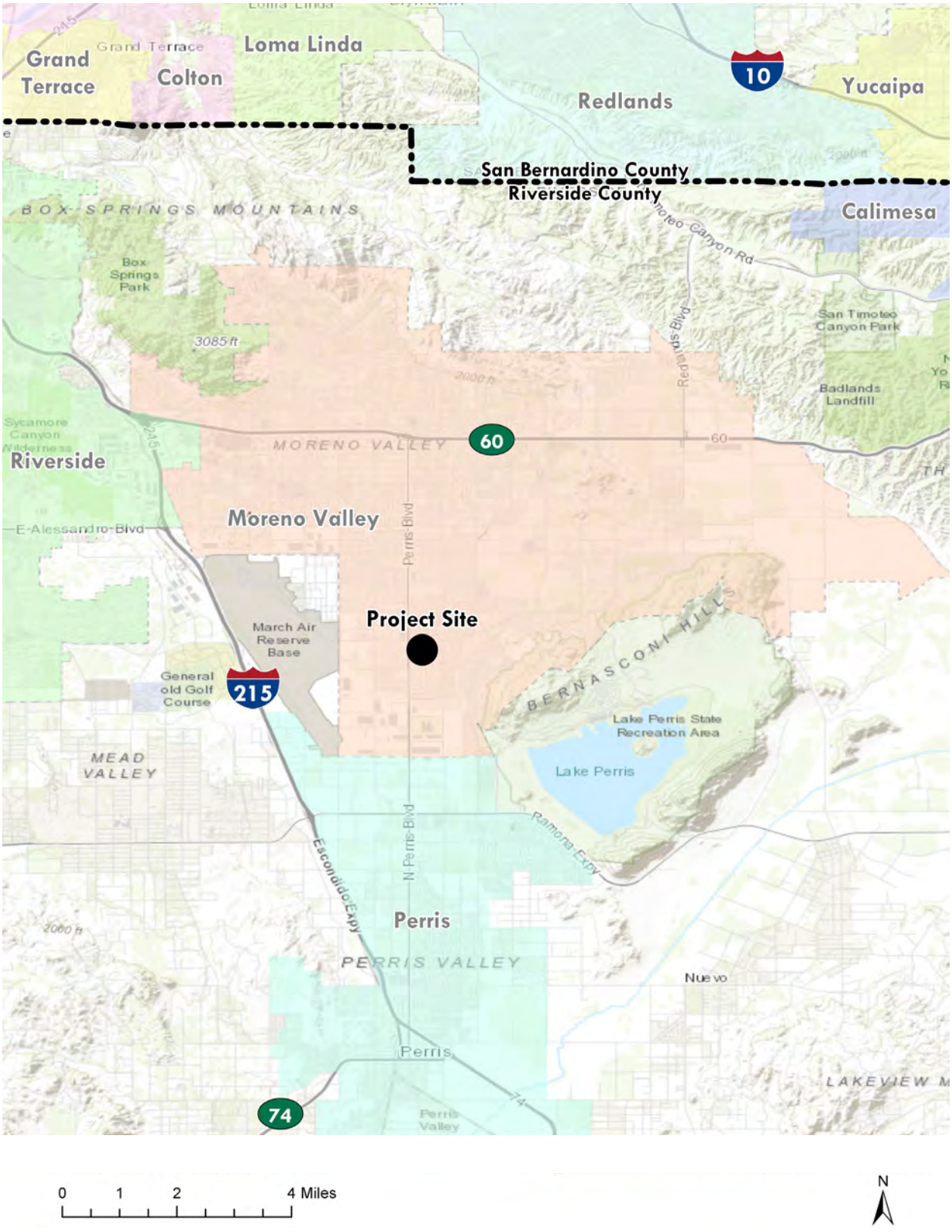
In accordance with Sections 15050 and 15367 of the State CEQA Guidelines, the City is the designated Lead Agency for the proposed project and has principal authority and jurisdiction for CEQA actions and project approval. Responsible Agencies are those agencies that have jurisdiction or authority over one or more aspects associated with the development of a proposed project and/or mitigation. Trustee Agencies are State agencies that have jurisdiction by law over natural resources affected by a proposed project.

The following discretionary approvals by the City of Moreno Valley, as Lead Agency, are anticipated to be necessary for implementation of the proposed project:

City of Moreno Valley

- General Plan Amendment to change the site's land use designation from Residential: Max. 5 du/ac (R5) and Commercial (C) to Residential: Max. 10 du/ac (R10)
- Zone change from Residential 5 District (R5) and Community Commercial (CC) to Residential Single Family 10 District (RS10)
- Approval of Tentative Tract Map (TTM 37909)
- Approval of a Conditional Use Permit (CUP) for a Planned Unit Development (PUD)

Regional Location



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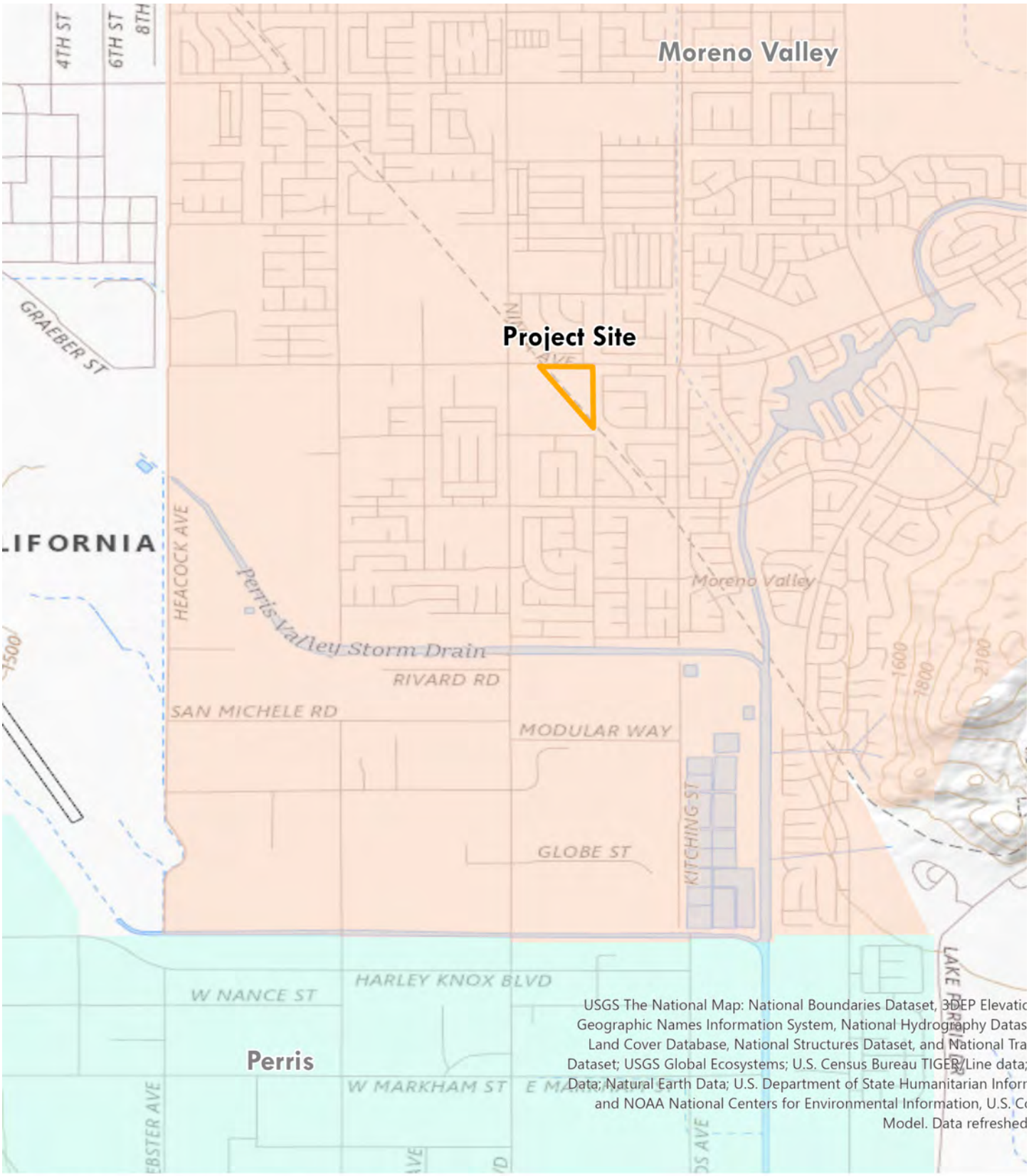
USGS Map with Project Location



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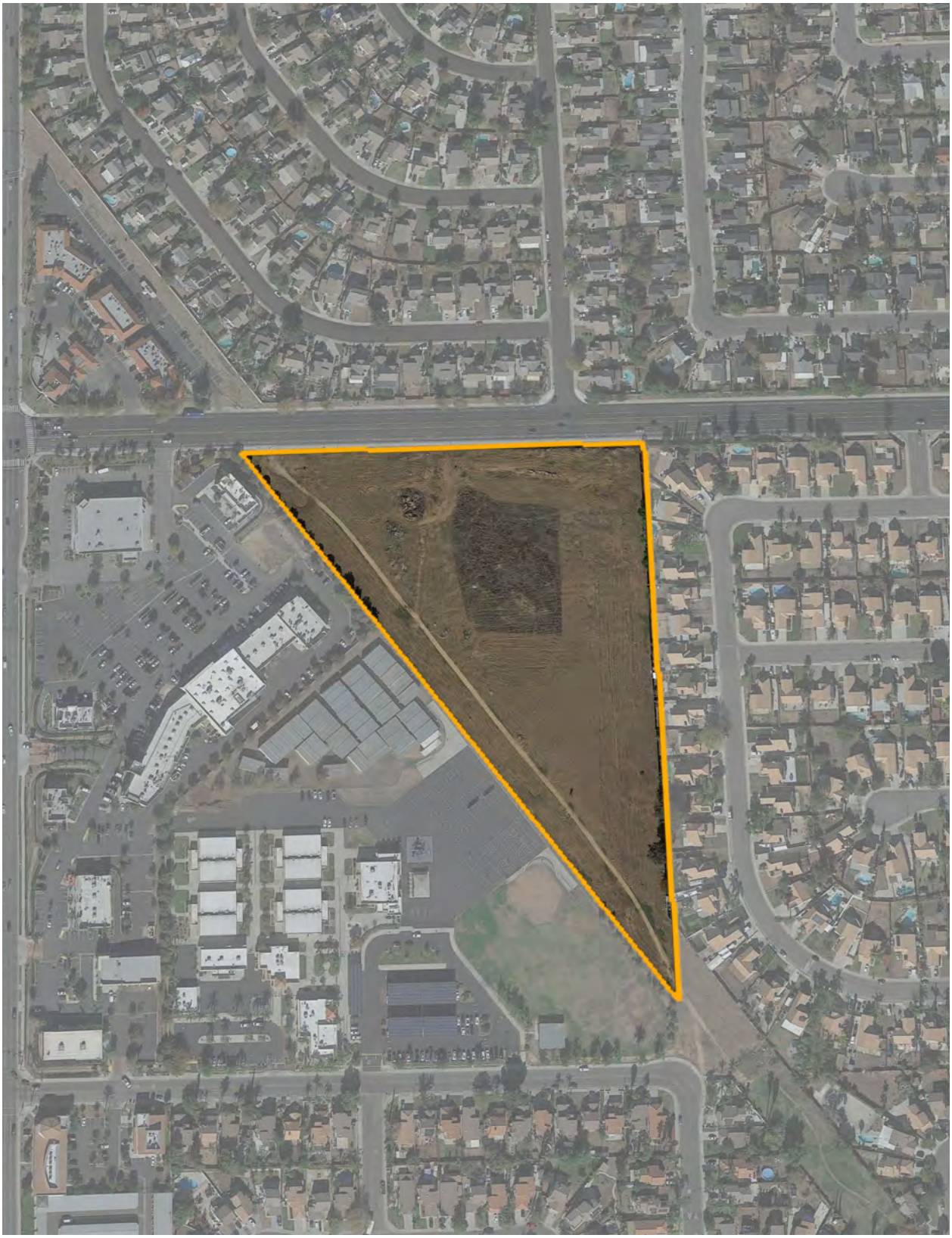
Aerial View



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Surrounding Land Uses

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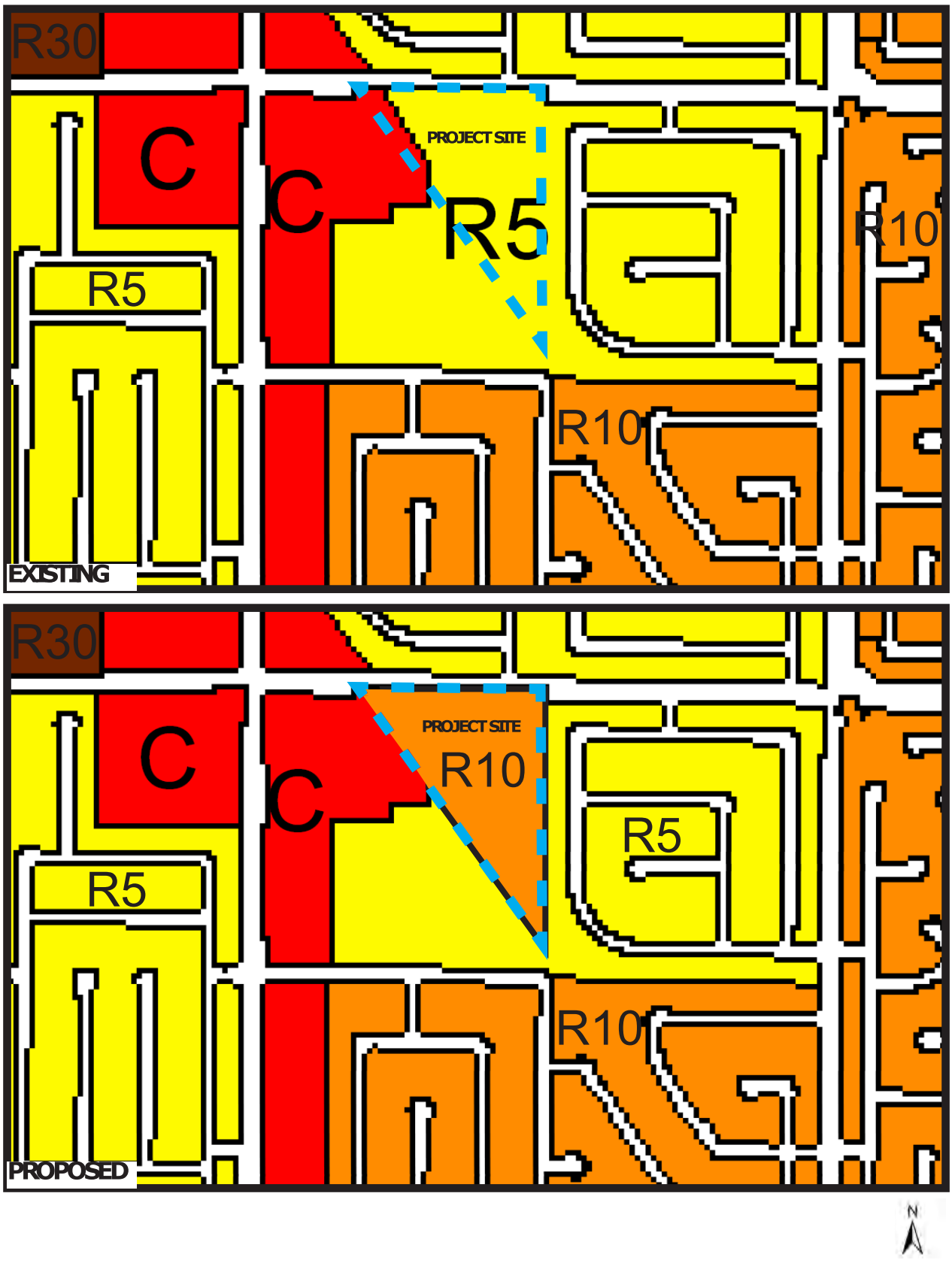
Existing and Proposed General Plan Land Uses



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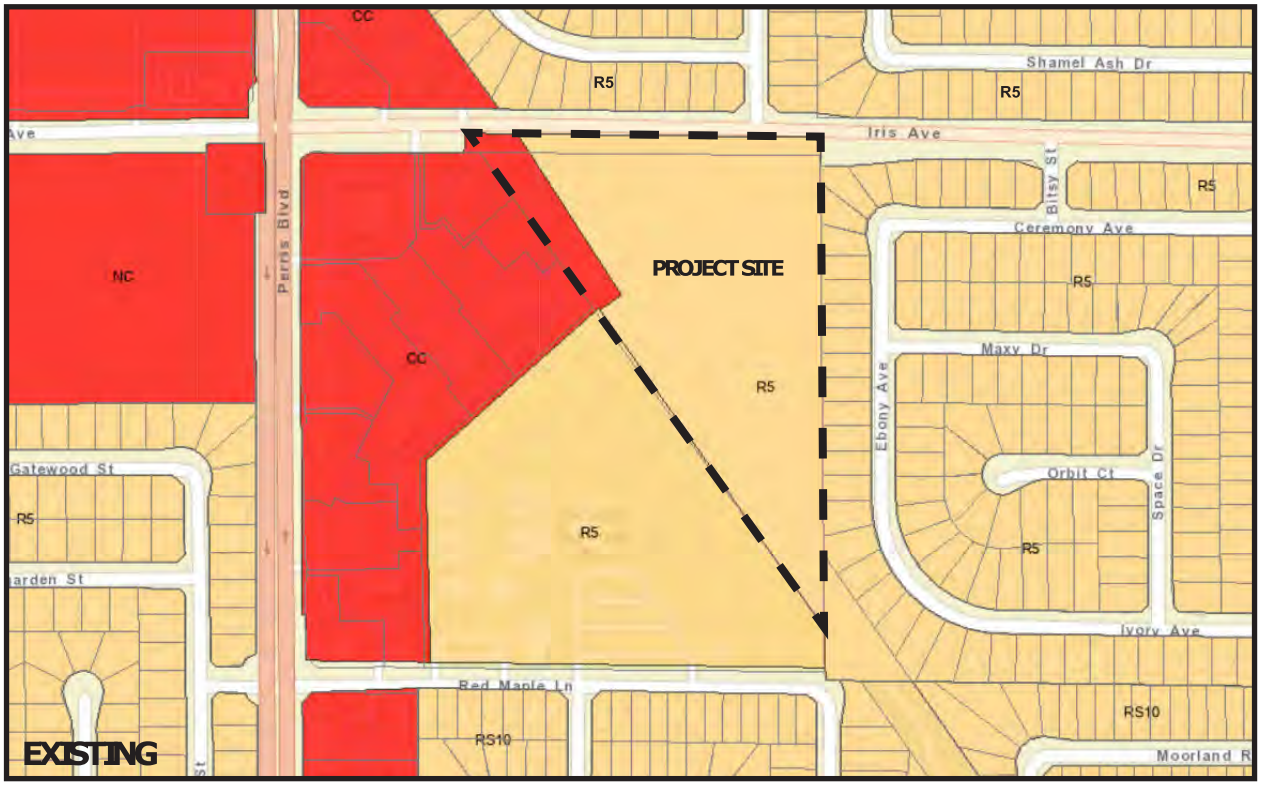
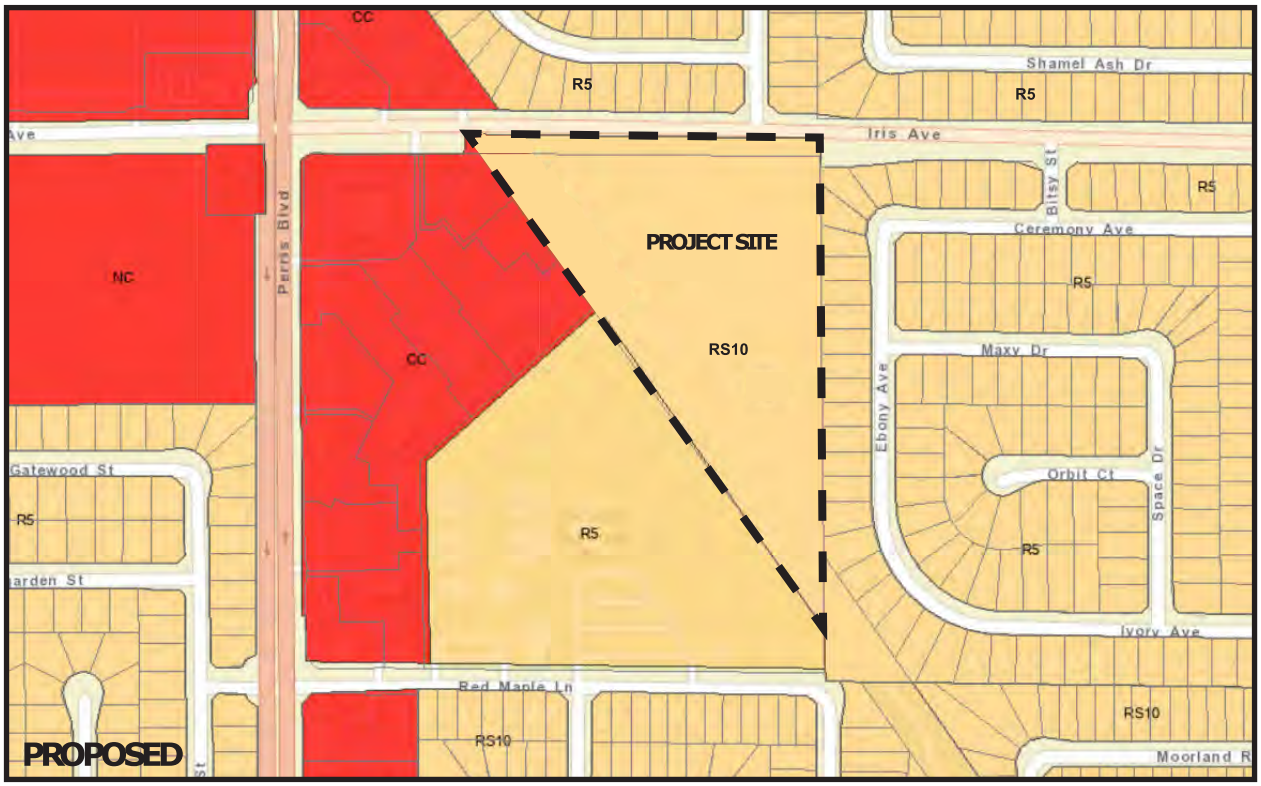
Existing and Proposed Zoning





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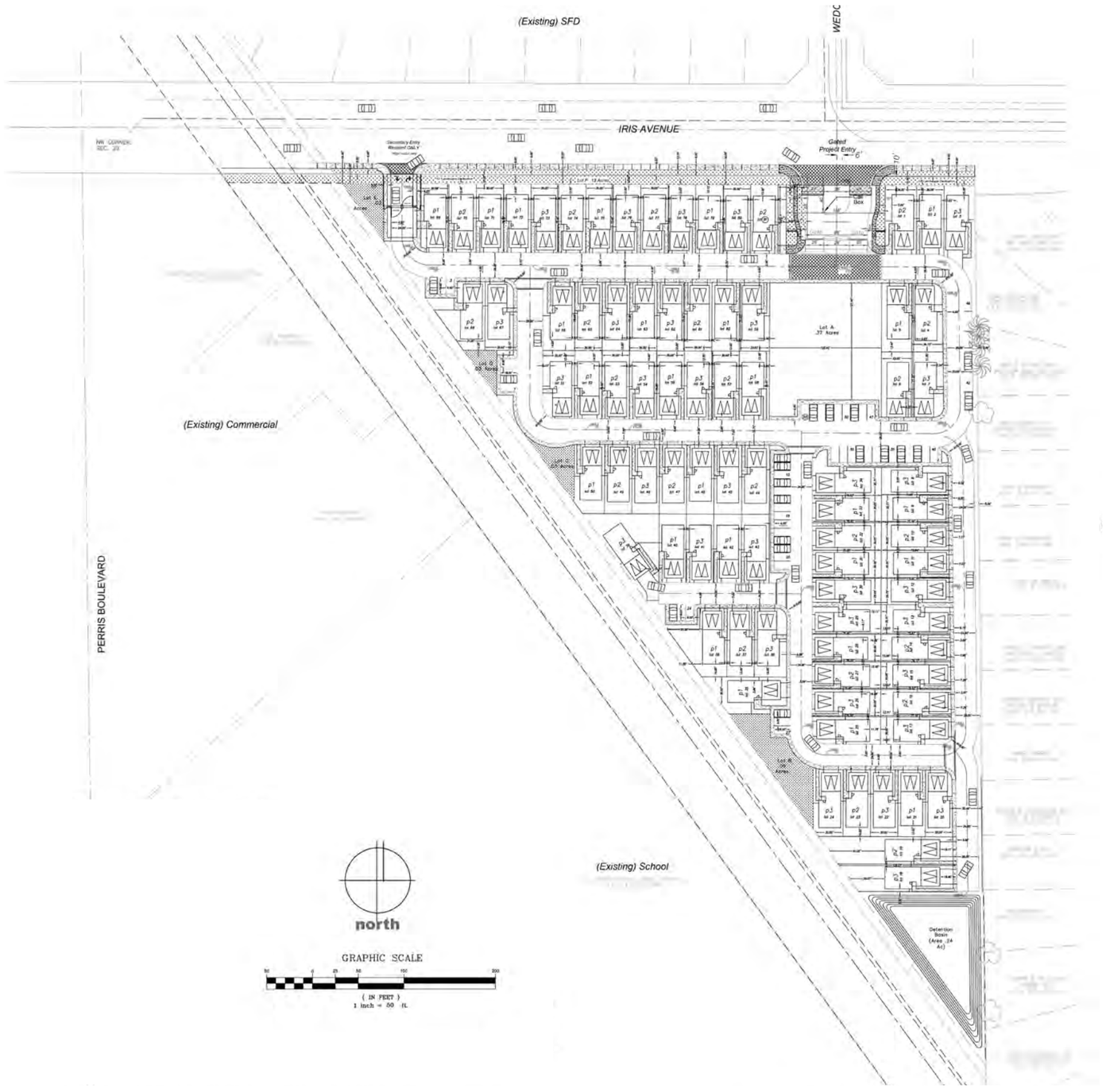
Conceptual Site Plan



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Landscape Plan

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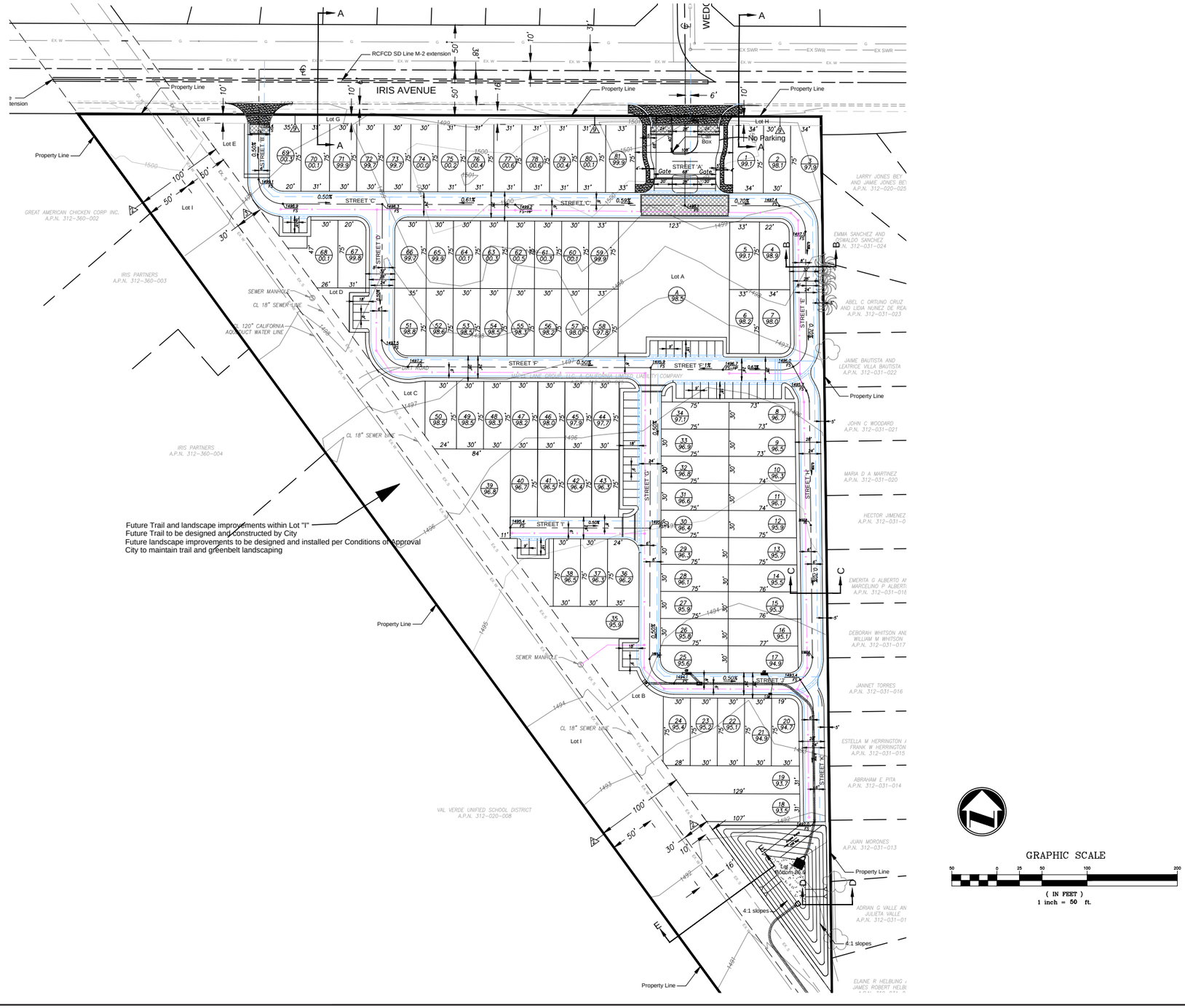
Tentative Tract Map No. 37909



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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 sent notices regarding the project to the following Native American tribes that may have knowledge regarding tribal cultural resources in the project vicinity:

- Agua Caliente Band of Cahuilla Indians
- Cahuilla Band of Indians
- Desert Cahuilla Indians
- Los Coyotes Band of Cahuilla Mission Indians
- Morongo Band of Mission Indians
- Pechanga Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- San Manuel Band of Mission Indians
- Santa Rosa Band of Mission Indians
- Serrano Nation of Mission Indians
- Soboba Band of Luiseño Indians

The Agua Caliente Band of Cahuilla Indians, Pechanga Band of Luiseño Indians, Rincon Band of Luiseño Indians, and Soboba Band of Luiseño Indians requested consultation regarding the proposed Project. The consulting tribes consider the area sensitive for cultural resources as several sites are located nearby. Although no information for site specific tribal cultural resources was provided (and there are no known tribal cultural resources on or adjacent to the project site), the consulting tribes requested inclusion of mitigation due to the potential of the Project to unearth previously undocumented tribal cultural resources during construction. These mitigation measures are incorporated in this Initial Study.

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

N/A

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

Appendix A	CalEEMod Emissions Summary
Appendix B	Habitat Assessment
Appendix C	Phase I Cultural Resources Assessment
Appendix D	Phase I Paleontological Resources Assessment
Appendix E	Preliminary Geotechnical and Infiltration Feasibility Investigation
Appendix F	Phase I Environmental Site Assessment
Appendix G	Preliminary Hydrology Report
Appendix H	Preliminary Project Specific Water Quality Management Plan
Appendix I	Noise Impact Analysis

Appendix J Trip Generation Analysis
Appendix K VMT Memo

17. **Acronyms:**

ADA - American with Disabilities Act
ALUC - Airport Land Use Commission
ALUCP - Airport Land Use Compatibility Plan
AQMP - Air Quality Management Plan
CEQA - California Environmental Quality Act
CIWMD - California Integrated Waste Management District
CMP - Congestion Management Plan
DTSC - 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/IPA- 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
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 -	Stormwater 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.

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

DETERMINATION (To be completed by the Lead Agency):

On the basis of this initial evaluation:

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

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

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

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

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

Signature

Julia Descosteaux
Printed Name

10/20/2020
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
I. AESTHETICS – Except as provided in Public Resources Code §21099 – Modernization of Transportation Analysis for Transit-Oriented Infill Projects – **Would the project:**				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒

Response:
No Impact. Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or "vista" of the scenic resource. Important factors in determining whether the proposed project would block scenic vistas include the project's proposed height, mass, and location relative to surrounding land uses and travel corridors.

The project site is located within a developed area of the city of Moreno Valley and is not within or adjacent to a scenic vista. The site is adjacent to roadways and existing residential, commercial, and educational land uses. The Moreno Valley General Plan Figure 6-2, Major Scenic Resources identifies the scenic resources within the City that include: Box Springs Mountains, Moreno Peak, Russell Mountains, Reche Mountains, and the Badlands.

The site is located approximately 1.5 miles west of the Russell Mountains. However, only partial views of the Russell Mountains are present on the project site between the existing single-family residences to the east. The proposed single-family residences would be a maximum of approximately 30 feet in height and would be the same height as existing single-family residences to the north and south.

In addition, Figure 6-2, *Major Scenic Resources* of the General Plan designates various view corridors throughout the city. The proposed project is not within or adjacent to a designated view corridor. Thus, development of the project site with single-family residences would not obstruct, interrupt, or diminish a scenic vista; and impacts would not occur.

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

Response:
No Impact. There are no designated state scenic highways in Moreno Valley. The closest eligible state scenic highway is State Route (SR) 74, which travels east/west and is approximately 9 miles to the south of the project site. The closest officially designated state scenic highway is SR-243, 24 miles from the project site, which runs from Interstate 10 (I-10) south of the city of Banning limits and through Idyllwild to Mountain Center (Caltrans 2018). Neither of the scenic highways discussed above are visible from the project site, therefore, no impacts to state scenic highways would occur from implementation of the proposed project.

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

Response:
Less Than Significant Impact. As described previously, the project site is located in a developing portion of Moreno Valley and is adjacent to roadways to the north, single-family residences to the east, commercial and educational uses to the west, and single-family residences to the south. Nearby parcels are developed with single-family residential, commercial, and educational uses. The project site is vacant. The existing character of the site and surrounding area is neither unique nor of special aesthetic value or quality.

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

The project would develop the project site to contain 81 new single-family residences, which would be similar to the single-family residential uses that are adjacent to the east of the site, to the south of the site beyond the Val Verde Academy, and to the north of the site beyond Iris Avenue.

Zoning. The project site is currently zoned as Residential 5 District (R5) and Community Commercial District (CC). The project includes a zone change to Residential Single-Family 10 District (RS10) to implement the proposed single-family residential uses. Section 9.03.020 of the City's Municipal Code states that the Residential Single-Family 10 District (RS10) zoning district is to provide for residential development on small single-family lots with amenities not generally found in suburban subdivisions. The district is intended for subdivisions at a maximum allowable density of 10 du/ac.

The proposed development would also require approval of a Conditional Use Permit (CUP) for a Planned Unit Development (PUD), which allows for a development to establish unique criteria for such things as setbacks, lot width and depth, building separation, and lot size. This is allowed in exchange for a higher level of detail and amenities within the project than typically required for standard residential development. The project would include a higher level of detail and amenities than standard residential development, including recreational amenities. Therefore, the project would be consistent with the standards for approval of a PUD listed in Section 9.03.060 of the City's Municipal Code.

In addition, as required within the RS10 district, the project shall provide small lot single-family subdivisions on less than 15 gross acres with landscaping and decorative walls along the street side of corner lots and at least two of the following amenities throughout the project; front porches; automatic garage door openers; and/or electronic security systems. The proposed project would install landscaping and decorative walls throughout the project site, as seen in Figure 7, *Landscape Plan*. The project would also provide front porches and automatic garage door openers for compliance with Section 9.03.040 of the Municipal Code.

As detailed in Table AES-1, with approval of a PUD, the proposed project would be consistent with the development standards for the RS10 zoning district listed in Municipal Code Section 9.03.040. Thus, the proposed project would not conflict with applicable zoning regulations governing scenic quality.

Table AES-1: Project Consistency with Residential 10 District (RS10) Development Standards

Standard	Municipal Code	Proposed
Minimum lot size	4,500 SF	2,250 SF*
Lot width	45 ft.	30 ft.*
Lot depth	85 ft.	75 ft.*
Maximum density	10 du/acre	7.58 du/acre
Height limit	35 feet/2 stories	30 feet/2 stories
*consistent with approval of a PUD		

General Plan. The project site currently has a General Plan land use designation of Residential: Max. 5 du/ac (R5) and Commercial (C). The proposed project includes a General Plan Amendment to change the designation of the site to Residential: Max. 10 du/ac (R10). According to the General Plan Land Use Element, the Residential: Max. 10 du/ac (R10) General Plan land use designation allows for development of residential uses to a maximum density of 10 dwelling units per acre. According to the General Plan Land Use Element, the Commercial General Plan land use designation allows for development of commercial uses.

The project's proposed density of approximately 7.48 du/ac would be consistent with the maximum allowable density of 10 du/ac with approval of a PUD. In addition, the project would be consistent with the General Plan Land Use Element goals and policies related to scenic quality, as shown in Table AES-2.

Table AES-2: Consistency with Land Use Element Goals and Policies Related to Scenic Quality

Goal or Policy	Project Consistency
Goal 2.1: A pattern of land uses, which organizes future growth, minimizes conflicts between land uses, and which promotes the rational utilization of presently underdeveloped and undeveloped parcels.	**Consistent.** The proposed project is a residential community on an infill parcel that creates a transition between the lower-density residential development to the east and the commercial and institutional uses to the west. This infill project would support the goal of minimizing conflict between land uses as it would contribute to the overall cohesiveness of the city by developing an underutilized plot of land. Therefore, the project would be consistent with Goal 2.1.
Goal 2.4: A supply of housing in sufficient numbers suitable to meet the diverse needs of future residents and to support healthy economic development without creating an oversupply of any particular type of housing.	**Consistent.** The proposed project would develop the vacant site with 81 new single-family residences, which would assist in meeting the diverse needs of future residents. In addition, the project would provide varying plans and architectural styles for the single-family residences, which would support healthy economic development ensuring an oversupply of a particular type of housing would not occur. Therefore, the project would be consistent with Goal 2.4.
Policy 2.2.8: The primary purpose of areas designated Residential 10 is to provide for a variety of residential products and to encourage innovation in housing types. Developments within Residential 10 areas are typically expected to provide amenities not generally found in suburban subdivisions, such as common open space and recreational areas. The maximum allowable density shall be 10.0 dwelling units per acre.	**Consistent.** This project involves a General Plan Amendment from R5 and C to R10 and a proposed Zone Change from R5 and CC to RS10. These land use changes allow for an increase in residential density from maximum 5 du/ac to 10 du/ac. The project implements an innovative housing type, detached single-family homes with attached garages on compact lots, and includes common open space areas and recreational features. Therefore, the project would be consistent with Policy 2.2.8.
Policy 2.2.12: Planned Unit Developments (PUD) shall be encouraged for residential construction in order to provide housing that is varied by type, design, form of ownership, and size. PUD's shall also provide opportunities to cluster units to protect significant environmental features and/or provide unique recreational facilities.	**Consistent.** As described in the Project Description, the proposed project would provide various plans and architectural styles for the single-family residences to provide housing that is varied by type, design, and size. In addition, the project would provide sidewalks and landscaping along the streets and within common areas provide unique recreational

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	facilities. Therefore, the project would be consistent with Policy 2.2.12.			
Policy 2.2.13: Discourage costly "leap-frog" development patterns by encouraging in-fill development wherever feasible, thereby reducing overall housing costs. Development within an area designated as SP 212-1 (Moreno Highlands) is not considered to be leapfrog development.	**Consistent.** The project is proposing to develop 81 single-family detached residences on an infill parcel. The project having a density of 10 du/ ac and developing an infill parcel is consistent with this local policy and is also supportive of State guidance to increase housing availability and affordability. Therefore, the project would be consistent with Policy 2.2.13.			
Policy 2.2.14: Encourage a diversity of housing types, including conventional, factory built, mobile home, and multiple family dwelling units.	**Consistent.** As described in the previous response, the proposed project would provide varying plans and architectural styles for the single-family residences to provide a diversity of housing types. Therefore, the project would be consistent with Policy 2.2.14.			
Policy 2.3.1: Within individual residential projects, a variety of floor plans and elevations should be offered.	**Consistent.** As described in the previous response, the proposed project would provide varying plans and architectural styles for the single-family residences. Therefore, the project would be consistent with Policy 2.3.1.			
Policy 2.3.2: Encourage building placement variations, roofline variations, architectural projections, and other embellishments to enhance the visual interest along residential streets.	**Consistent.** The proposed residential development would be designed with contemporary architectural elements, multi-level rooflines, and a complementary color scheme. Architectural elements in the exterior design would include stucco finish, stone veneer accents, metal awnings and deck railings, and vinyl window and door trim. The project would be designed with varying architectural design influences. When complete, the development would be representative of a modern residential community. In addition, landscaping improvements associated with the proposed project are anticipated to improve the existing visual character of the project site and would serve to provide increased visual interest along residential streets. Therefore, the project would be consistent with Policy 2.3.2.			

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

Policy 2.3.3: Discourage the development of single-family residences with a bulk (building mass) that is out of scale with the size of the parcels on which they are located.	**Consistent.** The proposed project would construct the proposed single-family residences with 3 different plans designed to conform to the size of the parcel on which they are located. Therefore, the project would be consistent with Policy 2.3.3.
Policy 2.3.4: Design large-scale small lot single family and multiple family residential projects to group dwellings around individual open space and/or recreational features.	**Consistent.** The proposed project would construct the proposed single-family residences with approximately 40,200 SF of private open space, as well as approximately 26,136 SF of common open space within the designated community park and fitness park proposed for the project site. Therefore, the project would be consistent with Policy 2.3.4.
Policy 2.10.1: Encourage a design theme for each new development that is compatible with surrounding existing and planned developments.	**Consistent.** The proposed project includes architectural styles, colors, and materials that are consistent with surrounding development, while providing enhancements that are consistent with contemporary architectural trends, allowing the community to be both compatible and distinctive. The overall theme encourages a seamless transition between the adjacent developments. Therefore, the project would be consistent with Policy 2.10.1.

Overall, the proposed project would be consistent with development standards required by the Residential Single-Family 10 Zoning District (RS10) with the approval of a CUP for a PUD, the Residential: Max. 10 du/ac (R10) General Plan land use designation, as well as the Land Use Element goals and policies related to scenic quality. Thus, the project would not conflict with applicable zoning and other regulations governing scenic quality. Furthermore, the project would increase the visual cohesion between the project site and the surrounding single-family residential area. Hence, the proposed project would not degrade the visual character of the project site and surrounding area; and impacts would be less than significant.

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

Response:

Less Than Significant Impact. The project site is undeveloped and has no existing source of nighttime lighting. However, the project site is surrounded by sources of nighttime lighting including streetlights along Iris Avenue, illumination from vehicle headlights, offsite exterior residential related lighting, offsite exterior commercial lighting, offsite exterior institutional lighting, and interior illumination passing through windows. Sensitive receptors relative to lighting and glare include residents, motorists, and pedestrians.

The proposed project would include the provision of street lighting and nighttime lighting for security purposes around all of the residences. Implementation of the proposed project would contribute additional sources to the overall ambient

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

nighttime lighting conditions. However, all outdoor lighting would be hooded, appropriately angled away from adjacent land uses, and would comply with the Moreno Valley Municipal Code, Section 9.16.280 that will highlight building features and add emphasis to important spaces and entryways, while limiting glare and light trespass onto adjacent properties. Because the project site is within an urban area with various sources of existing nighttime lighting, and the project would be required to comply with the City's lighting regulations that would be verified by the City's Building and Safety Division during the permitting process, the lighting increase in light that would be generated by the project would not adversely affect day or nighttime views in the area. Overall, lighting impacts would be less than significant.

Reflective light (glare) can be caused by sunlight or artificial light reflecting from finished surfaces such as window glass or other reflective materials. Generally, darker or mirrored glass would have a higher visible light reflectance than clear glass. Buildings constructed of highly reflective materials from which the sun reflects at a low angle can cause adverse glare. The proposed project would not use highly reflective surfaces, or glass sided buildings. Although the residences would contain windows, the windows would be separated by stucco and architectural elements, which would limit the potential of glare. In addition, as described previously, onsite lighting would be angled down and shielded, which would avoid the potential on onsite lighting to generate glare. Therefore, the project would not generate substantial sources of glare, and impacts would be less than significant.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Community Development Element – Section 2.3 – Community Design
   - Chapter 7 – Conservation Element – Section 7.8 – Scenic Resources
     - Figure 6-2 – Major Scenic Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.11 – Aesthetics
     - Figure 4.11-1 – Major Scenic Resources
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.110 – Light and Glare of the Moreno Valley Municipal Code.
   - Chapter 9.16 – Design Guidelines
   - Section 9.17.030 G – Heritage Trees
4. California Department of Transportation, California Scenic Highway Mapping System. 2020. Accessed: at http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/ (Accessed April 22, 2020).

II. AGRICULTURE AND FOREST RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resources Board. **Would the project:**				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Response: **No Impact.** The project site is identified by the California Department of Conservation (CDC) Important Farmland Finder as "Urban and Built-Up Land" (CDC 2020). "Urban and Build-Up Land" is occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. The project site is not designated as Prime, Unique, or Farmland of Statewide Importance. Thus, the proposed project would not result in impacts related to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
Response: **No Impact.** The project site has an existing zoning designation of Residential 5 (R5) District and Community Commercial (CC) District. The project site is not zoned for agricultural use and is not subject to a Williamson Act contract. Thus, the proposed project would not result in impacts related to conflict with an existing agricultural zoning or Williamson Act contract, and impacts would not occur.				
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
Response: **No Impact.** No forest land exists on or adjacent to the project site. The project is not zoned for forest land or timberland uses. Thus, the proposed project would not result in impacts related to conflict with an existing forest land or timberland zoning, and impacts would not occur.				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
Response: **No Impact.** No forest land exists on the project site. Thus, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use, and impacts would not occur.				
e) Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
Response: **No Impact.** As described in the responses above, the project area does not include farmland or forest land; thus, implementation of the proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use or conversion of forest land to non-forest use. Impacts would not occur.				
Existing Plans, Programs, or Policies None.				
Mitigation Measure None.				
Sources: 1. Moreno Valley General Plan, adopted July 11, 2006 • Chapter 7 – Conservation Element – Section 7.7 – Agricultural Resources 2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006 • Section 5.8 – Agricultural Resources - Figure 4.8-1 – Important Farmlands 3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4. California Department of Conservation, Important Farmland Finder. 2016. Available: https://maps.conservation.ca.gov/dlrp/ciff/ (Accessed April 22, 2020).				
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

Response: Less Than Significant Impact. The project site is located in the South Coast Air Basin (SCAB), which is under the jurisdictional boundaries of the South Coast Air Quality Management District (SCAQMD). The SCAQMD and Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin. In preparation of the AQMP, SCAQMD and SCAG uses regional growth projections to forecast, inventory, and allocate regional emissions from land use and development-related sources.

As described in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993), for purposes of analyzing consistency with the AQMP, if a proposed project would result in growth that is substantially greater than what was anticipated, then the proposed project would conflict with the AQMP. On the other hand, if a project's density is within the anticipated growth of a jurisdiction, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with SCAQMD's attainment plans. In addition, the SCAQMD considers projects consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation.

The proposed project is a residential development project on currently vacant site. The site is located within a residential area of Moreno Valley. As further described in Section 14, *Population and Housing*, the 81 new residences would result in the addition of 321 new residents, which would represent a population increase of approximately 0.15 percent and a 0.14 percent increase in residential units within the city. This limited level of growth would not exceed growth projections and would be consistent with the assumptions in the AQMP.

In addition, emissions generated by construction and operation of the proposed project would not exceed thresholds. As described in the analysis below, the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation. Therefore, impacts related to conflict with the AQMP from the proposed project would be less than significant.

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

Response:

Less Than Significant Impact. The SCAB is in a non-attainment status for federal ozone standards, federal carbon monoxide standards, and state and federal particulate matter standards. Any development in the SCAB, including the proposed project, could cumulatively contribute to these pollutant violations. The methodologies from the SCAQMD CEQA Air Quality Handbook are used in evaluating project impacts. SCAQMD has established daily mass thresholds for regional pollutant emissions, which are shown in Table AQ-1. Should construction or operation of the proposed project exceed these thresholds a significant impact could occur; however, if estimated emissions are less than the thresholds, impacts would be considered less than significant.

Table AQ-1: SCAQMD Regional Daily Emissions Thresholds

Pollutant	Construction (lbs/day)	Operations (lbs/day)
NOx	100	55
VOC	75	55
PM-10	150	150
PM-2.5	55	55
SOx	150	150
CO	550	550

Source: CalEEMod Emission Summary (Appendix A)

Construction

Construction activities associated with the proposed project would generate pollutant emissions from the following: (1) demolition and removal of the existing onsite improvements and recycling debris; (2) grading and excavation; (3) construction workers traveling to and from project site; (4) delivery and hauling of construction supplies to, and debris from, the project site; (5) fuel combustion by onsite construction equipment; (6) building construction; application of architectural coatings; and paving. The amount of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring.

It is mandatory for all construction projects to comply with several SCAQMD Rules, including Rule 823 for controlling fugitive dust, PM-10, and PM-2.5 emissions from construction activities. Rule 823 requirements include, but are not limited to: applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12 inches, and maintaining effective cover over exposed areas. Compliance with Rule 823 was accounted for in the construction emissions modeling for the project. In addition, implementation of SCAQMD Rule 1113 that governs the VOC content in architectural coating, paint, thinners, and solvents, was accounted for in the construction emissions modeling for the project. As shown in Table AQ-2, CalEEMod results indicate that construction emissions generated by the proposed project would not exceed SCAQMD regional thresholds. Therefore, emissions from construction activities would be less than significant.

Table AQ-2: Construction Emissions Summary

Construction Activity	Maximum Daily Emissions (pounds/day)					
	ROG	NOx	CO	SOx	PM-10	PM-2.5
2021						
Site Preparation	5.4	60.8	22.6	0.1	9.8	6.4
Grading	5.1	62.0	32.7	0.1	6.4	3.7
Building Construction	2.7	22.4	22.4	0.0	2.8	1.4
Paving 1	2.1	12.9	15.3	0.0	0.9	0.6
Maximum Daily Emission	5.4	62.0	37.7	0.1	9.8	6.4
2022						
Building Construction	2.4	20.3	21.8	0.0	2.6	1.3
Architectural Coating 1	60.5	1.5	2.7	0.0	0.4	0.2
Architectural Coating 2	60.5	1.5	2.7	0.0	0.4	0.2
Architectural Coating 3	60.5	1.5	2.7	0.0	0.4	0.2
Maximum Daily Emission	62.9	21.8	24.5	0.0	3.0	1.5
2023						
Building Construction	2.2	18.0	21.1	0.0	3.2	1.0
Paving 2	1.9	10.2	15.1	0.0	0.7	0.5
Architectural Coating 4	60.5	1.5	2.7	0.0	0.4	0.2
Maximum Daily Emissions	60.5	18.0	21.1	0.0	3.2	1.0
2021 to 2023 Maximum Daily Emissions	**62.9**	**62.0**	**37.7**	**0.1**	**9.8**	**6.4**
SCAQMD Significance Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Emissions Exceed Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
ROG=reactive organic gases NOx=oxides of nitrogen PM-10= particulate matter 10 microns or less in diameter
PM-2.5=particulate matter 2.5 microns or less in diameter CO=carbon monoxide SOx= sulfure oxides
PM emissions reflect SCAQMD Rule 823 reductions
Source: see CalEEMod model output

Source: CalEEMod Emission Summary (Appendix A)

Operation

Operation of the 81 single-family residences would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas consumption, landscaping, applications of architectural coatings, and consumer products. However, vehicular emissions would generate a majority of the operational emissions from the project.

Operational emissions associated with the proposed project were modeled using CalEEMod and are presented in Table AQ-3. As shown, the proposed project would result in long-term regional emissions of the criteria pollutants that would be below the SCAQMD's applicable thresholds. Therefore, operation of the project would not result in a cumulatively considerable net increase of any criteria pollutant impacts, and operational impacts would be less than significant.

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

Table AQ-3: Summary of Peak Operational Emissions

Operational Activity	Maximum Daily Regional Emissions (pounds/day)				
	ROG	NOx	CO	PM-10	PM-2.5
Area	4.3	0.1	6.7	0.0	0.0
Energy	0.1	0.6	0.3	0.1	0.1
Mobile	1.1	8.1	14.3	5.9	1.6
Total Project Operational Emissions	**5.5**	**8.8**	**24.3**	**6.0**	**1.7**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**

Notes:
NOx = oxides of nitrogen PM10 = particulate matter 10 microns or less in diameter ROG = reactive organic gases
PM2.5 = particulate matter 2.5 microns or less in diameter CO = carbon monoxide
Source: see CalEEMod model output

Source: CalEEMod Emission Summary (Appendix A)

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

Response:

Less Than Significant Impact. The SCAQMD's *Final Localized Significance Threshold Methodology* (SCAQMD 2008) recommends the evaluation of localized NO2, CO, PM-10, and PM-2.5 construction-related impacts to sensitive receptors in the immediate vicinity of the project site. Such an evaluation is referred to as a localized significance threshold (LST) analysis. According to the SCAQMD's *Final Localized Significance Threshold Methodology*, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs" (SCAQMD 2008). SCAQMD has developed LSTs that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of NOx, CO, PM-10, and PM-2.5 pollutants for each of the 38 source receptor areas (SRAs) in the SCAB. The project site is located within SRA 24, Perris Valley. The LSTs for this SRA were applied to the project.

Sensitive receptors can include residences, schools, playgrounds, childcare centers, athletic facilities. The project location is surrounded by several residential areas to the north and east with a shopping center and Val Verde Academy to the west of the project. The closest sensitive receptors where such a receptor could reside for 24 hours or longer are located at existing residences along the project's eastern property line. Therefore, the distance for sensitive receptors in the LST assessment was set at 25 meters, the shortest distance contained in the SCAQMD LST emission look-up tables (AQ 2020).

Construction

The localized thresholds from the mass rate look-up tables in SCAQMD's Final Localized Significance Threshold Methodology document, were developed for use on projects that are less than or equal to 5-acres in size or have a disturbance of less than or equal to 5 acres daily. The maximum daily area disturbed during construction is 4.0 acres, which occurs during grading activities. Therefore, the maximum daily disturbed area during construction was set as 4.0 acres for the localized assessment of construction impacts (AQ 2020).

Table AQ-4 identifies the localized impacts at the nearest receptor location in the vicinity of the project. As shown, project construction-source emissions would not exceed the applicable SCAQMD LSTs for emissions of any criteria pollutant. Thus, implementation of the project would not result in a localized air quality impact.

Table AQ-4: Localized Significance Summary of Construction

Construction Activity	Maximum Daily Emissions (pounds/day)			
	NOx	CO	PM-10	PM-2.5
2021				
Site Preparation	60.8	21.9	9.6	5.3
Grading	56.5	31.2	5.7	3.5
Building Construction	17.4	16.6	1.0	0.9
Paving 1	12.9	14.7	0.7	0.6
Maximum Daily Emission	60.8	31.3	9.6	0.9
2022				
Building Construction	15.6	16.4	0.8	0.8
Architectural Coating 1	1.4	1.8	0.1	0.1
Architectural Coating 2	1.4	1.8	0.1	0.1
Architectural Coating 3	1.4	1.8	0.1	0.1
Maximum Daily Emission	17.0	18.2	0.9	0.9
2023				
Building Construction	14.4	16.2	1.4	0.5
Paving 2	10.2	14.6	0.5	0.5
Architectural Coating 4	1.4	1.8	0.1	0.1
Maximum Daily Emissions	14.4	16.2	1.4	0.5
2021 to 2023 Maximum Daily Emissions	**60.8**	**31.3**	**9.8**	**6.4**
SCAQMD Significance Thresholds	**239**	**1,346**	**11**	**7**
Emissions Exceed Thresholds?	**No**	**No**	**No**	**No**

Notes:
ROG=reactive organic gases NOx=oxides of nitrogen PM-10= particulate matter 10 microns or less in diameter
PM-2.5=particulate matter 2.5 microns or less in diameter CO=carbon monoxide SOx= sulfure oxides
PM emissions reflect SCAQMD Rule 823 reductions
Source: see CalEEMod model output

As described in Response 4.3(a), the proposed project would not significantly increase long-term emissions within the project area. Construction of the proposed project may expose nearby residential sensitive receptors to airborne particulates as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, construction contractors would be required to implement measures to reduce or eliminate emissions by following SCAQMD's standard construction practices (Rules 822 and 823, as included as PPP AQ-1 and PPP AQ-2). Rule 822 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Rule 823 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during construction, and impacts would be less than significant.

Operation

For operational LSTs, onsite passenger car and truck travel emissions were modeled. The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state Ambient Air Quality Standards. As shown on Table AQ-5, operational emissions would not exceed the SCAQMD's localized significance thresholds for any criteria pollutant at the nearest sensitive receptor. Therefore, localized air quality impacts from operational activities would be less than significant.

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

Table AQ-5: Localized Significance Summary of Operations

Operational Activity	Maximum Daily Localized Emissions (pounds/day)			
	NOx	CO	PM-10	PM-2.5
Area	0.1	6.8	0.0	0.0
Energy	0.6	0.3	0.1	0.1
Mobile	6.4	3.2	0.1	0.0
Total Project Operational Emissions	7.1	10.3	0.2	0.1
SCAQMD Significance Threshold	270	1,577	4	2
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes:
NOx = oxides of nitrogen PM-10 = particulate matter 10 microns or less in diameter
PM-2.5 = particulate matter 2.5 microns or less in diameter CO = carbon monoxide
Source: see CalEEMod model output

Source: CalEEMod Emission Summary (Appendix A)

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

Response:

No Impact. The proposed project would not emit other emissions, such as those generating objectionable odors, that would affect a substantial number of people. The threshold for odor is identified by SCAQMD Rule 822, Nuisance, which states:

> *A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals*.

The type of facilities that are considered to result in other emissions, such as objectionable odors, include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

The proposed project would implement residential development within the project area that does not involve the types of uses that would emit objectionable odors affecting a substantial number of people. In addition, odors generated by non-residential land uses are required to be in compliance with SCAQMD Rule 822, which would prevent nuisance odors.

During construction, emissions from construction equipment, architectural coatings, and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and would not affect a substantial number of people. The noxious odors would be confined to the immediate vicinity of the construction equipment. Also, the short-term construction-related odors would cease upon the drying or hardening of the odor-producing materials. Therefore, impacts associated with other emissions, such as odors, would not adversely affect a substantial number of people.

Existing Plans, Programs, or Policies

PPP AQ-1: Rule 822. The project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 822. The project shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of

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

persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

PPP AQ-2: Rule 823. The project is required to comply with the provisions of South Coast Air Quality Management District (SCAQMD) Rule 823, which includes the following:

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the project are watered, with complete coverage of disturbed areas, at least 3 times daily during dry weather; preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and project site areas are reduced to 15 miles per hour or less.

PPP AQ-3: Rule 1113. The project is required to comply with the provisions of South Coast Air Quality Management District Rule (SCAQMD) Rule 1113. Only "Low-Volatile Organic Compounds" paints (no more than 50 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications shall be used**.**

Mitigation Measure
None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 5 – Circulation Element
   - Chapter 6 – Safety Element – Section 6.6 – Air Quality
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.3 – Air Quality
     - Figure 4.3-1 – South Coast Air Basin
   - Appendix C – Air Quality Analysis, P&D Consultants, July 2003
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.050 – Air Quality of the Moreno Valley Municipal Code
   - Section 9.10.150 – Odors of the Moreno Valley Municipal Code
   - Section 9.10.170 – Vibration of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Section 12.50.040 – Limitations on Engine Idling
5. Summary of CalEEMod Model Runs and Output for the Iris Park Residential Project. April 8, 2020. Prepared by Vince Mirabella (Appendix A).
6. South Coast Air Quality Management District Final Localized Significance Threshold Methodology (SCAQMD 2008). Accessed: http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (Accessed May 5, 2020).

IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

Response:
Less Than Significant Impact with Mitigation Incorporated. The project site is vacant and undeveloped and has been disturbed. A Biological Habitat Assessment was prepared for the proposed project, which included a literature search to identify special status plants, wildlife, and habitats known to occur in the vicinity of the project site. General plant and wildlife surveys were also conducted to identify any biological resources on or adjacent to the project site. The project site is within the Western Riverside County MSHCP Reche Canyon/Badlands Area Plan.

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

The Habitat Assessment identified 18 special-status wildlife species and one special-status plant species. Special-status wildlife species identified in the literature review that were determined to have a potential for occurrence (PFO) within the survey area include California horned lark (*Eremophila alpestris actia*), California glossy snake (*Arizona elegans occidentalis*) and Western yellow bat (*Lasiurus xanthinus*). Species PFO was determined based on proximity of historical records and quality of habitat on site. Of the 18 target wildlife species documented to occur within the project vicinity, one (California horned lark) was determined to have a moderate potential for occurrence, and two (glossy snake and western yellow bat) had a low potential for occurrence based on proximity of historical records and quality of habitat on site.

California horned lark is a covered species under the MSHCP. This species may be subject to both temporary and permanent, direct, and indirect impacts, as a result of the proposed project (Blackhawk 2020). Thus, Mitigation Measure BIO-1 has been included to ensure compliance with the MSHCP through the payment of MSCHP mitigation fees. With implementation of Mitigation Measures BIO-1, impacts related to MSCHP covered special-status species would be less than significant.

Western yellow bat was determined to have a low potential for roosting within the survey area based on the presence of Mexican fan palms (*Washingtonia robusta*) present on lands immediately adjacent to the project site. However, suitable roosting sites for this species do not occur directly within the project and this species is presumed absent from the project site (Blackhawk 2020).

Based on California Natural Diversity Database, U.S. Fish and Wildlife Service, and Calfiornia Native Plant Society-documented occurrences within five miles of the project site, the literature review identified one special-status plant species requiring evaluation for its potential to occur on the project site (smooth tarplant; *Centromadia pungens ssp. laevis*). Smooth tarplant was determined to be absent from the project site and survey area, based on lack of individuals observed on site, proximity of historic records, and quality of habitat on site.

In addition, a Habitat Assessment for burrowing owl was performed throughout the survey area, as the entirety of the project falls within areas designated as MSHCP survey areas for the species. Blackhawk performed a habitat assessment for burrowing owl concurrently with the habitat assessment on February 24, 2020. The assessment was performed per the Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area – Step 1 Habitat Assessment (2005, by walking meandering transects through the entire survey area (excluding urban development). At the time of the assessment, the project site did not support suitable habitat for burrowing owl; however, two rubble piles containing shallow cavities were identified on the site and were occupied by desert cottontail and a domestic cat during the 2020 breeding season, precluding occupation by burrowing owl. The habitat assessment determined that the survey area does not support suitable habitat for burrowing owl. Though, occupied by other species at the time of the assessment, these rubble piles have a low potential to support migrating burrowing owls as temporary roost sites, if they become vacant (prior to construction. Following the MSHCP recommendation of a preconstruction burrowing owl survey within 30 days prior to construction, no negative impacts to burrowing owl are anticipated. If burrowing owls are present during the nonbreeding season (September 1 through February 28), burrowing owl exclusion measures may be implemented in accordance with the Plan.

The Habitat Assessment performed by Blackhawk Environmental identified suitable habitat and substrate for migratory birds that are protected under the Migratory Bird Treaty Act and California Department of Fish and Wildlife (CDFW) Codes 3503 and 3503.5 (Blackhawk 2020). Therefore, Mitigation Measure BIO-2 has been included to require pre-construction nesting bird surveys, as well as recommendations for vegetation removal outside of the nesting bird season. With implementation of Mitigation Measure BIO-2, impacts related to protected bird species would also be reduced to a less than significant level.

Thus, through adherence to the recommendations provided in the Habitat Assessment, payment of the MSHCP mitigation fees, and implementation of pre-construction nesting bird surveys, the project would be fully consistent with the MSCHP, CDFW, and USFWS, and impacts would be less than significant with implementation of MM BIO-1 and MM BIO-2.

ISSUES & SUPPORTING INFORMATION SOURCES:	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?	☐	☐	☐	☒

Response:
No Impact. The project site consists of vacant land that has been heavily disturbed by grading. The Habitat Assessment performed by Blackhawk Environmental identified that the presence of any potentially jurisdictional features, including associated vegetation/communities, presence of ordinary high watermarks (OHWMs) or streambeds, substrates, hydrological indicators and potential connectivity was not observed during the Habitat Assessment.
In addition, riparian/riverine habitats were not identified within the project site. Due to the lack of habitat which supports riparian species, riparian/riverine-associated species listed in section 6.1.2 of the Plan are not expected to occur. No MSHCP-covered or riparian-associated species were directly observed during the February 24, 2020 field survey (Blackhawk 2020). Thus, impacts to riparian habitat or other sensitive natural community would not occur from implementation of the proposed project.

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

Response:
No Impact. As described in the response above, the project site does not contain any drainages, creeks, rivers, or other wetland areas, or any potentially jurisdictional water bodies that may be subject to USACE, RWQCB, and/or CDFW jurisdictions. In addition, no vernal pools or habitat that could potentially support fairy shrimp species were observed on the project site. Thus, impacts to state or federally protected wetlands would not occur from implementation of the proposed project.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with an established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐

Response:
Less Than Significant Impact with Mitigation Incorporated. The project site is vacant and undeveloped but is adjacent to roadways, disturbed, and developed land uses. Due to the existing conditions of the project site and the surrounding land uses, the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors. There are no native wildlife nursery sites. However, as described previously, the site includes areas that are suitable for nesting birds that are protected under the Migratory Bird Treaty Act and California Department of Fish and Wildlife (CDFW) Codes 3503 and 3503.5 (Blackhawk 2020). Therefore, Mitigation Measure BIO-2 has been included to require pre-construction nesting bird surveys.

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

Response:
No Impact. There are no local biological related policies or ordinances, such as a tree preservation policy or ordinance that is applicable to the proposed project. The project site is adjacent existing non-native ornamental trees that are on the right-of-way on Iris Avenue and adjacent to the single-family residential areas to the east and are not subject to any ordinances. The project site contains non-protected native shrubs and herbs as well as non-native grasses and shrubs, but there are no trees on the project site. Therefore, implementation of the proposed project would not conflict with local polices or ordinances protecting trees and no impact would occur.

ISSUES & SUPPORTING INFORMATION SOURCES:	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?	☐	☐	☐	☒

Response:

No Impact. See Response 4(a) above. The project site occurs within the Western Riverside County MSHCP. As required by the MSHCP, a Habitat Assessment for burrowing owl was performed throughout the survey area, as the entirety of the project falls within areas designated as MSHCP survey areas for the species. Furthermore, MM BIO-1 includes payment of MSHCP mitigation fees. With performance of the Habitat Assessment for burrowing owl and payment of MSHCP mitigation fees, the project is consistent with the provisions of the MSHCP. Development of the project site would not conflict with local, regional, or state resource preservation and/or conservation policies. Therefore, no significant impacts would occur as a result of project implementation.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

MM-BIO 1: Payment of MSHCP Mitigation Fees. Prior to issuance of a grading or building permit, the applicant will be required to pay relevant MSHCP mitigation fees per the Final Mitigation Fee Nexus Report. These fees will be determined in consultation with the Riverside Conservation Authority based on final project classification and impacts. Payment of all mitigation fees will be required as part of the project approval process.

MM-BIO 2: Preconstruction Nesting Bird Surveys. To the extent feasible, conduct vegetation removal outside of the nesting bird season (generally between March 1 and August 31). If vegetation removal is required during the nesting bird season, conduct take avoidance surveys for nesting birds within 100-feet of areas proposed for vegetation removal. Surveys should be conducted by a qualified biologist(s) within 14 days of vegetation removal. If active nests are observed, a qualified biologist will determine appropriate minimum disturbance buffers or other adaptive mitigation techniques (e.g., biological monitoring of active nests during construction-related activities, staggered schedules, etc.) to ensure that impacts to nesting birds are avoided until the nest is no longer active.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.1 – Biological Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.9 – Biological Resources
     - Figure 4.9-1 – Planning Area Biological Geographic Sections
     - Figure 4.9-2 – Planning Area Vegetation Community
     - Figure 4.9-3 – Project Site Location within the MSHCP Area
     - Figure 4.9-4 – Reche Canyon/Badlands Area Plan
   - Appendix E – Biological Resources Study, Appendix E
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.17.030 G – Heritage Trees
4. Moreno Valley Municipal Code Chapter 8.60 – Threatened and Endangered Species
5. Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), http://www.wrc-rca.org/about-rca/multiple-species-habitat-conservation-plan/
6. Stephens' Kangaroo Rat Habitat Conservation Plan (SKRHCP), Governing Documents | RCHCA, CA
7. Iris Park Project, Western Riverside MSHCP Habitat Assessment and Consistency Analysis. March 31, 2020. Prepared by Blackhawk Environmental, Inc. (Appendix B).

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒

Response:

Less than Significant. According to the *State CEQA Guidelines*, a historical resource is defined as something that meets one or more of the following criteria:

1) Listed in, or determined eligible for listing in, the California Register of Historical Resources;
2) Listed in a local register of historical resources as defined in Public Resources Code (PRC) Section 5020.1(k);
3) Identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or
4) Determined to be a historical resource by the project's Lead Agency.

As described previously, the project site is currently vacant. A review of historical aerial photographs and topographic maps indicate that prior to 1990s, the project area was agricultural. By the late 1990s, the surrounding area saw increased commercial and residential development that has continued up to the present day. Based on the results of the cultural resources search and survey, the proposed project area is considered to have a low sensitivity for presence of significant prehistoric or historical archaeological deposits or features (CUL 2020). Therefore, the project would not cause a substantial adverse change in the significance of a historical resource, and no impact would occur.

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

Response:

Less than Significant Impact with Mitigation Incorporated. The Phase 1 Cultural Resources Assessment prepared for the project site included an archaeological records check that was completed at the University of California, Riverside, Eastern Information Center (UCR-EIC). The UCR-EIC is the countywide clearing house/repository for all archaeological and cultural studies completed within the Riverside County. All pertinent data was researched, including previous studies for a one-mile radius surrounding the project area and the identification of recorded resources within one mile. In addition, the research included review of the current listings (federal, state, and local) for evaluated resources and reviewed historic maps. The record search indicated five previously recorded resources located within a one-mile radius of the area, with no resources located directly within the project area (CUL 2020). However, because previous resources have been identified within a one-mile radius of the project area, MM CUL-1 has been included to require contractors to halt work within 50 feet of any inadvertent finds of potential archaeological resource and to have the find evaluated by a qualified archaeologist.

Furthermore, as required for compliance with CEQA guidelines and the data requirements of the Office of Historic Preservation (OHP), an intensive field survey was conducted to adequately identify, describe, report , and, if possible, evaluate any cultural resources identified within the project area boundaries. This intensive field survey was conducted on March 6, 2020 by MCC Archaeologist Zachary White. During the course of fieldwork, survey conditions were fair and ground visibility was poor to good (10-80%) throughout the 10.8-acre project area, due to prior ground disturbance and vegetation coverage. The field survey determined that the property has been disturbed due to vehicular activity and modern dumping activity. No cultural resources were identified during the investigation (CUL 2020).

Based on the negative findings presented above, there are no cultural resources, significant or not, within or adjacent to the project area. In addition, as discussed previously, based on the results of the cultural resources search and survey, the proposed project area is considered to have a low sensitivity for presence of significant prehistoric or historical archaeological deposits or features Further, implementation of MM CUL-1 would ensure the proper treatment of any unknown resources that might be identified during construction activities. Thus, potential impacts related to archaeological resources would be less than significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Disturb any human remains, including those interred outside of formally dedicated cemeteries?	☐	☐	☐	☒

Response:

No Impact. The project site has not been previously used as a cemetery. Thus, human remains are not anticipated to be uncovered during project construction. In addition, procedures of conduct following the discovery of human remains on non-federal lands have been mandated by California Health and Safety Code §7050.5, PRC §5097.98 and the California Code of Regulations (CCR) §15064.5(e), which have been included as PPP CUL-1. According to the provisions in CEQA, should human remains be encountered, all work in the immediate vicinity of the burial must cease and any necessary steps to ensure the integrity of the immediate area must be taken. The Riverside County Coroner shall be immediately notified and must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the NAHC, who will in turn, notify the person they identify as the Most-Likely-Descendent (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC (CUL 2020). Thus, with compliance with PPP CUL-1, no impacts would occur.

Existing Plans, Programs, or Policies

PPP CUL-1: Human Remains. Should human remains be encountered, all work in the immediate vicinity of the burial must cease and any necessary steps to ensure the integrity of the immediate area must be taken. The Riverside County Coroner shall be immediately notified and must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the NAHC, who will in turn, notify the person they identify as the Most-Likely-Descendent (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.

Mitigation Measures

MM CUL-1: Inadvertent Discoveries. In the event that buried archaeological resources are inadvertently discovered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation or fossil recovery, may be warranted and would be discussed in consultation with the appropriate regulatory agency(ies).

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.2 – Cultural and Historical Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.10 – Cultural Resources
     - Figure 4.10-1 – Locations of Listed Historic Resource Inventory Structures
     - Figure 4.10-2 – Location of Prehistoric Sites
     - Figure 4.10-3 – Paleontological Resource Sensitive Areas
   - Appendix F – Cultural Resources Analysis, Study of Historical and Archaeological Resources for the Revised General Plan, City of Moreno Valley, Archaeological Associates, August 2003.
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Title 7 – Cultural Preservation
5. Cultural Resources Inventory for the City of Moreno Valley, Riverside County, California, prepared by Daniel F. McCarthy, Archaeological Research Unit, University of California, Riverside, October 1987 (*This document*

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

cannot be provided to the public due to the inclusion of confidential information pursuant to Government Code Section 6254.10.)

6. Phase I Cultural Resources Assessment: Iris Park Project, City of Moreno Valley, Riverside County, California. March 2020. Prepared by Material Culture Consulting, Inc. (Appendix C).

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

Response:

Less Than Significant Impact. The project site is currently vacant. The Southern California Gas Company provides natural gas to the surrounding area. Additionally, Southern California Edison and Moreno Valley Utility currently provides electricity services to the surrounding area. The proposed project would install onsite electrical and natural gas infrastructure that would connect to the existing offsite lines.

Construction

During construction of the proposed project, energy would be consumed in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment on the project sites, construction worker travel to and from the project sites, as well as delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction activities related to the proposed building and the associated infrastructure would not be expected to result in demand for fuel greater on a per-unit-of-development basis than other development projects in southern California. In addition, the extent of construction activities that would occur is limited to an 18-month period, and the demand for construction-related electricity and fuels would be limited to that time frame.

Construction contractors are required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment as part of the City's construction permitting process. In addition, compliance with existing CARB idling restrictions would reduce fuel combustion and energy consumption. The energy modeling shows that project construction electricity usage over the 26-month construction period is estimated to use 31,154 gallons of diesel fuel, as shown in Table E-1.

Table E-1: Estimated Construction Equipment Diesel Fuel Consumption

Activity	Equipment	Project Number	Project Hours per day	Default Horse-power	Default Load Factor	Days of Construction	Total Horsepower-hours	Fuel Rate (gal/hp-hr)	Fuel Use (gallons)
Site Preparation	Rubber Tired Dozer	3	8	247	0.40	10	23,712	0.02046	485
	Crawler Tractor	4	8	212	0.43	10	29,171	0.02217	647
Grading	Excavators	2	8	158	0.38	30	28,819	0.01976	570
	Graders	2	8	187	0.41	30	36,802	0.02114	778
	Rubber Tired Dozers	1	8	247	0.40	30	23,712	0.02046	485
	Crawler Tractor	2	8	212	0.43	30	43,757	0.02217	970
	Scrapers	2	8	367	0.48	30	84,557	0.02498	2,112
Building Construction	Crane	1	7	231	0.29	520	243,844	0.01489	3,631
	Forklifts	3	8	89	0.20	520	222,144	0.02396	5,324
	Tractors/Loaders/Backhoes	3	7	97	0.37	520	391,919	0.01911	7,491
	Welders	1	8	46	0.46	520	88,026	0.02147	1,890
	Generator Set	1	8	84	0.74	520	258,586	0.02147	5,552
Paving 1	Pavers	2	8	130	0.42	10	8,736	0.02151	188
	Paving Equipment	2	8	132	0.36	10	7,603	0.01833	139
	Rollers	2	8	80	0.36	10	4,608	0.01942	89
Architectural Coating 1	Air Compressor	1	6	78	0.48	20	4,493	0.02147	96
Architectural Coating 2	Air Compressor	1	6	78	0.48	20	4,493	0.02147	96
Architectural Coating 3	Air Compressor	1	6	78	0.48	20	4,493	0.02147	96
Architectural Coating 4	Air Compressor	1	6	78	0.48	20	4,493	0.02147	96
Paving 2	Pavers	2	8	130	0.42	10	8,736	0.02151	188
	Paving Equipment	2	8	132	0.36	10	7,603	0.01833	139
	Rollers	2	8	80	0.36	10	4,608	0.01942	89
								TOTAL	**31,154**

Source: CalEEMod Emission Summary (Appendix A)

Table E-2 shows that construction workers would use approximately 38,210gallons of fuel to travel to and from the project site, and haul trucks and vendor trucks would use approximately 19,888 gallons of diesel fuel.

Table E-2: Estimated Construction Vehicle Trip Related Fuel Consumption

Construction Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
Haul Trucks	2,165	0
Vendor Trucks	17,723	0
Worker Vehicles	0	38,210
Construction Vehicles Total	19,888	38,210

Source: CalEEMod Emission Summary (Appendix A)

Overall, construction activities would comply with all existing regulations, and would therefore not be expected to use fuel in a wasteful, inefficient, and unnecessary manner. Thus, no impacts related to construction energy usage would occur.

Operation

Once operational, the project would generate demand for electricity, natural gas, as well as gasoline for motor vehicle trips. Operational use of energy includes the heating, cooling, and lighting of the residences, water heating, operation of electrical systems and plug-in appliances, and outdoor lighting, and the transport of electricity, natural gas, and water to the residences where they would be consumed. This use of energy is typical for urban development, no additional energy infrastructure would be required to be built to operate the project, and no operational activities would occur that would result in extraordinary energy consumption.

The proposed project would be required to meet the current Title 24 energy efficiency standards. The City's administration of the Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation and air conditioning equipment (HVAC); solar-reflective roofing materials; energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc. In complying with the Title 24 standards, impacts to peak energy usage periods would be minimized, and impacts on statewide and regional energy needs would be reduced. Thus, operation of the project would not use large amounts of energy or fuel in a wasteful manner, and no operational energy impacts would occur. As detailed in Table E-3, operation of the proposed project is estimated to result in the annual use of approximately 32,304 gallons of diesel fuel, 87,330 gallons of gas, approximately 706,035 kilowatt-hour (kWh) of electricity, and approximately 2,478,290 thousand British thermal units (kBTU) of natural gas.

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

Table E-3: Estimated Annual Operational Energy Consumption

Operational Source		
Energy Source	**Annual VMT**	**Gallons of Gasoline Fuel**
Transportation – Project	278,145 (Diesel)	32,304 (Diesel)
	2,314,975 (Gas)	87,330 (Gas)
	2,593,120(Total)	
	Thousands Kilowatt-Hours	
Electricity – Project	706,035	
	Thousands British Thermal Units	
Natural Gas – Project	2,478,290	
Source: see Fuel Usage Spreadsheet and CalEEMod output		

Source: CalEEMod Emission Summary (Appendix A)

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

Response:

No Impact. The proposed project would be required to meet the CalGreen energy efficiency standards in effect during permitting of the project. The City's administration of the requirements includes review of design components and energy conservation measures during the permitting process, which ensures that all requirements are met. In addition, the project would not conflict with or obstruct opportunities to use renewable energy, such as solar energy. As discussed, the project proposes to use photovoltaic (PV) solar panels on each of the residences to offset their energy demand in accordance with Title 24. As such, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would not occur.

Existing Plans, Programs, or Policies

PPP GHG-1: CalGreen Compliance, provided in Section 8, *Greenhouse Gas Emissions.*

Mitigation Measures

None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.6 – Energy Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Summary of CalEEMod Model Runs and Output for the Iris Park Residential Project. April 8, 2020. Prepared by Vince Mirabella (Appendix A).
5. City of Moreno Valley Energy Efficiency and Climate Action Strategy. Accessed at: http://www.moval.org/pdf/efficiency-climate112012nr.pdf (Accessed April 28, 2020).

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf	☐	☐	☐	☒

Response:
No Impact. The project site is not located within a designated Alquist-Priolo Earthquake Fault Zone or County of Riverside Fault zone. As described by the Preliminary Geotechnical and Infiltration Feasibility Investigation prepared for the proposed project, the nearest known active fault zone is the San Jacinto fault zone located approximately 6.1 miles northeast of the project site. Other major faults within the region include the Elsinore fault zone located approximately 16.2 miles to the southwest, and the San Andreas fault zone located approximately 17 miles to the northeast of the project site (GEO 2020). Thus, the proposed project would not expose people or structures to potential substantial adverse effects from rupture of a known earthquake fault that is delineated on an Alquist-Priolo Earthquake Fault Zoning Map, and impacts would not occur.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

Response:
Less Than Significant Impact. The project site is located within a seismically active region of Southern California. As mentioned previously, San Jacinto Fault is located approximately 6.1 miles northeast of the project site (GEO 2020). Thus, moderate to strong ground shaking can be expected at the site. The amount of motion can vary depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located closer to an earthquake epicenter, that consists of poorly consolidated material such as alluvium, and in response to an earthquake of great magnitude.

Structures built in the City are required to be built in compliance with the California Building Code (CBC [California Code of Regulations, Title 24, Part 2]), included in the Municipal Code as Chapter 8.20. In addition, PPP GEO-1 has been included to provide provisions for earthquake safety based on factors including occupancy type, the types of soils onsite, and the probable strength of the ground motion. Compliance with the CBC would include the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structures so that it would withstand the effects of strong ground shaking. Because the proposed project would be constructed in compliance with the CBC, the proposed project would result in a less than significant impact related to strong seismic ground shaking.

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

Response:
Less Than Significant Impact. Soil liquefaction is a phenomenon in which saturated, cohesionless soils layers, located within approximately 50 feet of the ground surface, lose strength due to cyclic pore water pressure generation from seismic shaking or other large cyclic loading. During the loss of stress, the soil acquires "mobility" sufficient to permit both horizontal and vertical movements. Soil properties and soil conditions such as type, age, texture, color, and consistency, along with historical depths to ground water are used to identify, characterize, and correlate liquefaction susceptible soils.

According to the Preliminary Geotechnical and Infiltration Feasibility Investigation for the proposed project, the County of Riverside has mapped the overall site area as having low liquefaction potential. Liquefaction is a process in which strong ground shaking causes saturated soils to lose their strength and behave as a fluid. Ground failure associated with liquefaction can result in severe damage to structures. Soil types susceptible to liquefaction include sand, silty sand, sandy silt, and silt, as well as soils having a plasticity and a moisture content greater than 85 percent of the liquid limit.

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

The geologic conditions for increased susceptibility to liquefaction are: 1) shallow groundwater (generally less than 50 feet in depth); 2) the presence of unconsolidated sandy alluvium, typically Holocene in age; and 3) strong ground shaking. All three of these conditions must be present for liquefaction to occur.

Both the liquefaction potential index (LPI) and the liquefaction severity number (LSN) indices were calculated for the soil profiles of exploratory borings taken on the project site. The results indicate that the liquefaction risk of the site is "very low" to "low" per the LPI index of 0. In addition, the site exhibits "little to no expression of liquefaction, minor effects" per the LSN index of 0 (GEO 2020).

Furthermore, as described previously, structures built in the City are required to be built in compliance with the CBC, as included in the City's Municipal Code as Chapter 8.20 (and herein as PPP GEO-1), which implements specific requirements for seismic safety, excavation, foundations, retaining walls and site demolition. Compliance with the CBC, as included as PPP GEO-1, would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that project structures would withstand the effects of seismic ground movement, including liquefaction and settlement. Compliance with the requirements of the CBC and City's municipal code for structural safety (included as PPP GEO-1) would reduce hazards from seismic-related ground failure, including liquefaction and settlement to a less than significant level.

iv) Landslides?	☐	☐	☐	☒

Response:
No Impact. Landslides and other slope failures are secondary seismic effects that are common during or soon after earthquakes. Areas that are most susceptible to earthquake-induced landslides are steep slopes underlain by loose, weak soils, and areas on or adjacent to existing landslide deposits.

As described above, the project site is located in a seismically active region subject to strong ground shaking. However, the project site is flat and does not contain any steep slopes or any other areas that could be subject to landslides. In addition, the site is located in a flat and developed area. Therefore, the project would not cause potential substantial adverse effects related to slope instability or seismically induced landslides.

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

Response:
Less Than Significant Impact. Construction of the project has the potential to contribute to soil erosion and the loss of topsoil. Grading and excavation activities that would be required for the proposed project would expose and loosen topsoil, which could be eroded by wind or water.

The City's Municipal Code Section 8.21.170 implements the requirements of the all applicable requirements of the State Water Resources Control Board (SWRCB) and the Santa Ana Regional Water Quality Control Board (SARWQCB), and all projects in the City are required to conform to the permit requirements. This includes installation of Best Management Practices (BMPs) in compliance with the NPDES permit, which establishes minimum stormwater management requirements and controls that are required to be implemented for the proposed project. To reduce the potential for soil erosion and the loss of topsoil, a Stormwater Pollution Prevention Plan (SWPPP) is required by the Regional Water Quality Control Board (RWQCB) regulations to be developed by a QSD (Qualified SWPPP Developer). The SWPPP is required to address site-specific conditions related to specific grading and construction activities. The SWPPP is required to identify potential sources of erosion and sedimentation loss of topsoil during construction, identify erosion control BMPs to reduce or eliminate the erosion and loss of topsoil, such as use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, hydroseeding. With compliance with the City's Municipal Code, RWQCB requirements, and the BMPs in the SWPPP that is required to be prepared to implement the project included as PPP WQ-1, construction impacts related to erosion and loss of topsoil would be less than significant.

In addition, the proposed project includes installation of landscaping, such that during operation of the project substantial areas of loose topsoil that could erode would not exist. In addition, as described in Section 10, *Hydrology and Water*

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

Quality, the onsite drainage features that would be installed by the project have been designed to slow, filter, and slowly discharge stormwater into the offsite drainage system, which would also reduce the potential for stormwater to erode topsoil during project operations. Furthermore, implementation of the project requires City approval of a site specific Water Quality Management Plan (WQMP), which would ensure that the City's Municipal Code, RWQCB requirements, and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. As a result, potential impacts related to substantial soil erosion or loss of topsoil would be less than significant.

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

Response:

Less Than Significant Impact. As described above, the project site is flat, and does not contain nor is adjacent to any slope or hillside area. The project would not create slopes. Thus, on or off-site landslides would not occur from implementation of the project.

Differential settlement or subsidence could occur if buildings or other improvements are built on low-strength foundation materials (including imported fill) or if improvements straddle the boundary between different types of subsurface materials (e.g., a boundary between native material and fill). Although differential settlement generally occurs slowly enough that its effects are not dangerous to inhabitants, it can cause building damage over time. Seismic settlement in dry soils generally occurs in loose sands and silty sands, with cohesive soils being less prone to significant settlement. The Idriss and Boulanger (2008) and Pradel (1998) methods were used to evaluate liquefaction-induced settlement and dry sand settlement. The results indicate that a maximum seismic settlement of less than one-half inch can be anticipated. Based on the relative uniformity of soil materials encountered, differential seismic settlement is anticipated to be approximately one-half of the total seismic settlement. Overall, since the site is underlain by dense/stiff to dense/hard older alluvial materials, the potential for settlement is considered low. In addition, the earthwork operations recommended to be conducted during the development of the site will mitigate any near surface loose soil conditions. Thus, impacts would be less than significant (GEO 2020).

Liquefaction also involves lateral or horizontal displacement (lateral spreading) of essentially intact blocks of surficial soils on slopes or toward a free-face slope such as river or canal bank. The potential for and magnitude of lateral spreading is dependent upon many conditions, including the presence of a relatively thick, continuous, potentially liquefiable sand layer and high slopes. As discussed previously, Both the liquefaction potential index (LPI) and the liquefaction severity number (LSN) indices were calculated for the soil profiles of exploratory borings taken on the project site. The results indicate that the liquefaction risk of the site is "very low" to "low" per the LPI index of 0. In addition, the site exhibits "little to no expression of liquefaction, minor effects" per the LSN index of 0. In addition, site reconnaissance and review of aerial imagery of the site and vicinity indicates that there are no known or suspected landslides at the site or in close proximity to the site and, therefore, the potential for seismically induced landslides occurring at the site is considered very low (GEO 2020).

Also, as described previously, compliance with the CBC, as included as PPP GEO-1, would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that project structures would withstand the effects of related to ground movement, including lateral spreading. Thus, with compliance with the CBC, as included as PPP GEO-1, would reduce potential impacts to a less than significant level.

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

Response:

Less Than Significant Impact. Expansive soils contain certain types of clay minerals that shrink or well as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas

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

with seasonal changes of soil moisture experiences, such as southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture.

The Preliminary Geotechnical and Infiltration Feasibility Investigation performed an evaluation of the potential for expansive soils at the site. The laboratory testing performed found the soils tested to have a very low expansion potential. For very low expansive soils, no specialized construction procedures to resist expansive soil activity are necessary. However, careful evaluation of on-site soils and any import fill for their expansion potential should be conducted during the grading operation (GEO 2020). As described previously, compliance with the CBC, as included as PPP GEO-1, would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that project structures would withstand the effects of related to ground movement, including expansive soils. Thus, impacts would be less than significant.

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

Response:
No Impact. The project would not use septic tanks or alternative methods for disposal of wastewater into subsurface soils. Furthermore, the proposed project would connect to existing public wastewater infrastructure. Therefore, the project would not result in any impacts related to septic tanks or alternative wastewater disposal methods.

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

Response:
Less than Significant Impact with Mitigation Incorporated. The Phase 1 Paleontological Resources Assessment prepared for the project included a locality search conducted through the Natural History Museum of Los Angeles County (LACM) to identify any previously identified paleontological resources near the project site.

The Phase 1 Paleontological Resources Assessment found that no significant paleontological resources were identified within the project area during the locality search or field survey. The uppermost layers of soil within the project area are of recently disturbed Quaternary alluvium that is unlikely to contain significant fossil vertebrates. However, LACM notes that significant fossils have been found within similar alluvial mapped units, and that any excavations that extend deeper and into older and finer-grained Quaternary deposits may encounter significant fossil vertebrate remains. In addition, the project area is mapped in RCLIS as High B is based on geologic formations or mapped rock units that are known to contain (or have the correct age and depositional conditions to contain) significant paleontological resources at a depth below 5 feet (PALEO 2020).

Therefore, based on the results of the Phase I Paleontological Resources Assessment, the project area is considered to have high sensitivity for the potential to impact paleontological resources during construction activities at or below 5 feet in undisturbed sedimentary deposits. MCC recommends preparation of a Paleontological Resource Management Plan (PRMP) prior to construction excavation. Thus, Mitigation Measure PAL-1 has been included to require preparation of a PRMP and that a professional paleontologist be hired to oversee monitoring. With implementation of Mitigation Measure PAL-1, impacts to paleontological resources would be less than significant.

Existing Plans, Programs, or Policies
PPP GEO-1: California Building Code. The project is required to comply with the California Building Code as included in the City's Municipal Code Chapter 8.20 to preclude significant adverse effects associated with seismic hazards. California Building Code related and geologist and/or civil engineer specifications for the project are required to be incorporated into grading plans and specifications as a condition of project approval.
PPP WQ-1: Stormwater Pollution Prevention Plan, provided in Section 10, *Hydrology and Water Quality*.
PPP WQ-2: Water Quality Management Plan, provided in Section 10, *Hydrology and Water Quality***.**

Mitigation Measures

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

MM PAL-1: Paleontological Resources. Prior to issuance of grading permits, the developer will retain a qualified paleontologist to provide the following monitoring and reporting services during construction:

- A trained and qualified paleontological monitor will perform full-time monitoring of any excavations on the project that have the potential to impact paleontological resources in undisturbed native sediments below 5 feet in depth. The monitor will have the ability to redirect construction activities to ensure avoidance of adverse impacts to paleontological resources.
- The project paleontologist may re-evaluate the necessity for paleontological monitoring after examination of the affected sediments during excavation.
- Any potentially significant fossils observed shall be collected and recorded in conjunction with best management practices and SVP professional standards.
- Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.
- A report documenting the results of the monitoring, including any salvage activities and the significance of any fossils, will be prepared and submitted to the appropriate City personnel.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.5 – Geologic Hazards
     - Figure 5-3 – Geologic Faults & Liquefaction
   - Chapter 7 – Conservation Element – Section 7.4 -- Soils
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.6 – Geology and Soils
     - Figure 4.6-1 – Geology
     - Figure 4.6-2 – Seismic Hazards
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Chapter 8.21 – Grading Regulations
5. Local Hazard Mitigation Plan, City of Moreno Valley Fire Department, adopted October 4, 2011, amended 2017, http://www.moval.org/city_hall/departments/fire/pdfs/haz-mit-plan.pdf
   - Chapter 4 – Earthquake
     - Figure 3-1 – Right-Lateral Strike -Slip Fault
     - Figure 3-1.1 – Moreno Valley Geologic Faults and Liquefaction 2016
     - Figure 3-1.2 – Moreno Valley Area Ground Shaking Map
   - Chapter 8 – Landslide
     - Figure 7-1 – Moreno Valley Slope Analysis 2016
6. Emergency Operations Plan, City of Moreno Valley, March 2009, http://www.moval.org/city_hall/departments/fire/pdfs/mv-eop-0309.pdf
   - Threat Assessment 1 – Major Earthquakes
     - Figure 8 – Types of Faults
     - Figure 9 – Earthquake Faults
     - Figure 11 – Comparison of Richter Magnitude and Modified Mercalli Intensity
     - Figure 12 – Magnitude 4.5 or Greater Earthquake Map
     - Figure 13 – Geologic Faults and Liquefaction
7. Phase I Paleontological Resources Assessment, Iris Park Project, City of Moreno Valley, Riverside County, California. March 2020. Prepared by Material Culture Consulting, Inc. (Appendix D).
8. Preliminary Geotechnical and Infiltration Feasibility Investigation, Proposed Iris Park Residential Development, Moreno Valley, California. November 25, 2019. Prepared by LOR Geotechnical Group, Inc. (Appendix E).

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

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

GHG Thresholds

The City of Moreno Valley has not adopted a numerical significance threshold to evaluate greenhouse gas (GHG) impacts. SCAQMD does not have approved thresholds; however, it does have draft thresholds that provides a tiered approach to evaluate GHG impacts, which includes the following:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
    - Residential and Commercial land use: 3,000 MTCO2e per year
    - Industrial land use: 10,000 MTCO2e per year
    - Based on land use type: residential: 3,500 MTCO2e per year; commercial: 1,820 MTCO2e per year; or mixed use: 3,000 MTCO2e per year

The SCAQMD's draft threshold uses the Executive Order S-3-05 year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO2 concentrations at 450 ppm, thus stabilizing global climate. Therefore, for purposes of examining potential GHG impacts from implementation of the proposed project, and to provide a conservative analysis of potential impacts, the Tier 3 screening level for all land use projects of 3,000 MTCO2e was selected as the significance threshold (AQ 2020).

In addition, SCAQMD methodology for project's construction are to average them over 30-years and then add them to the project's operational emissions to determine if the project would exceed the screening values listed above (AQ 2020).

Climate Action Plan

The City of Moreno Valley adopted an Energy Efficiency and Climate Action Strategy document in 2012. The Energy Efficiency and Climate Action Strategy is a policy document which identifies ways that the City can reduce energy and water consumption and GHG emissions as an organization (its employees and the operation of its facilities) and outlines the actions that the City can encourage and community members can employ to reduce their own energy and water consumption and GHG emissions. The project involves the construction and operation of an automobile dealership that would fall under the scope of these policies.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Response:

Less Than Significant Impact. Construction activities produce GHG emissions from various sources, such as site excavation, grading, utility engines, heavy-duty construction vehicles onsite, equipment hauling materials to and from the site, asphalt paving, and motor vehicles transporting the construction crew.

In addition, operation of the proposed residences would result in area and indirect sources of operational GHG emissions that would primarily result from vehicle trips, electricity and natural gas consumption, water transport (the energy used to pump water), and solid waste generation. GHG emissions from electricity consumed by the residences would be generated off-site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source.

The estimated operational GHG emissions that would be generated from implementation of the proposed project are shown in Table GHG-1. Additionally, in accordance with SCAQMD recommendation, the project's amortized construction

related GHG emissions are added to the operational emissions estimate in order to determine the project's total annual GHG emissions.

Table GHG-1: Greenhouse Gas Emissions

Activity	Annual GHG Emissions ($MTCO_2e$)
Project Operational Emissions	
Area	1
Energy	305
Mobile	1,142
Waste	48
Water	43
Total	1,538
Project Construction Emissions	47
Project Construction and Operation	1,585
Significance Threshold	**3,000**
Project Exceeds Threshold?	**No**

Source: CalEEMod Emission Summary (Appendix A)

As shown on Table GHG-1, the project would result in approximately 1,585 MTCO2e per year, below the screening threshold of 3,000 MTCO2e per year. Therefore, impacts related to greenhouse gas emissions would be less than significant.

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

Response:

No Impact. The proposed project would develop the site with single-family residences that would comply with state programs that are designed to be energy efficient. The proposed project would comply with all mandatory measures under the California Title 24, California Energy Code, and the CalGreen Code, which would provide efficient energy and water consumption. The City's administration of the requirements includes review of the energy conservation measures during the permitting process, which ensures that all requirements are met. In addition, the project includes photovoltaic (PV) solar panels to offset the energy demand. Therefore, the proposed project would not conflict with existing plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gas.

Existing Plans, Programs, or Policies

PPP GHG-1: CalGreen Compliance. The project is required to comply with the CalGreen Building Code as included in the City's Municipal Code to ensure efficient use of energy. CalGreen specifications are required to be incorporated into building plans as a condition of building permit approval.

Mitigation Measures

None.

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

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. California's 2017 Climate Change Scoping Plan, prepared by the California Air Resources Board, November 2017, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, accessed April 24, 2019
5. Summary of CalEEMod Model Runs and Output for the Iris Park Residential Project. April 8, 2020. Prepared by Vince Mirabella (Appendix A).
6. City of Moreno Valley Energy Efficiency and Climate Action Strategy. Accessed at: http://www.moval.org/pdf/efficiency-climate112012nr.pdf (Accessed April 28, 2020)

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

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

Response:

Less Than Significant Impact. A hazardous material is defined as any material that, due to its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that regulatory agencies have a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the home, workplace, or environment. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment.

Construction

The proposed construction activities would involve the routine transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking during construction activities. In addition, hazardous materials would routinely be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and state regulations that are implemented by the City during building permitting for construction activities. Construction would also include temporary dewatering during excavation for utility installations if the excavation is deep enough to encounter groundwater. If such excavations are in the vicinity of the impacted groundwater in the northeast portion of the site, the water would either be contained and transported to a licensed off-site treatment facility or treated on site before discharge under a county permit to the sanitary sewer. As a result, construction of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

Operation

The project involves operation of 81 new single-family residences, which involve routinely using hazardous materials including solvents, cleaning agents, paints, pesticides, batteries, fertilizers, and aerosol cans. These types of materials are not acutely hazardous and would only be used and stored in limited quantities. The normal routine use of these hazardous materials products pursuant to existing regulations would not result in a significant hazard to people or the environment in the vicinity of the project. Therefore, operation of the project would not result in a significant hazard to the public or to the environment through the routine transport, use, or disposal of hazardous waste, and impacts would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

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

Response:

Less Than Significant Impact. A Phase I ESA was prepared by AES Due Diligence, Inc. (AES) for the project site. The purpose of the Phase I analysis was to evaluate the project site for potential Recognized Environmental Concerns (RECs) that may be present, off-site conditions that may impact the subject property, and/or conditions indicative of releases or threatened releases of hazardous substances on, at, in, or to the project site.

ASTM defines a Recognized Environmental Condition (REC) as "the presence or likely presence of an hazardous substance or petroleum products in, on, or at a property: 1) due to release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment."

The project site was evaluated for the presence of Recognized Environmental Condition's (REC), including Controlled Recognized Environmental Conditions (CREC) and Historic Recognized Environmental Conditions (HREC). The project site was also evaluated for Business Environmental Risks (BER) and *de minimis* conditions.

A Controlled Recognized Environmental Condition (CREC) is defined as "a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, of meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)."

A Historic Recognized Environmental Condition (HREC) is defined as "a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)."

A de minimis environmental condition "generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate government agencies." However, conditions determined to be de minimis are not a REC.

Business Environmental Risk (BER) is a risk, which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of the parcel of commercial real estate, not necessarily limited to those environmental issues investigated in this Phase I ESA. Business environmental risk issues may involve addressing one or more non-scope considerations.

The Phase I ESA was performed in general accordance with ASTM Designation E 1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and following the Scope of Work outlined in AES Due Diligence, Inc.'s proposal. AES Due Diligence, Inc. (AES) conducted on-site observations on October 31, 2019, interviewed site operations personnel and observed adjacent properties. Environmental Data Resources, Inc. (EDR) conducted database searches following ASTM guidelines. Such searches are generally limited to a radius of one mile from the subject site. Additionally, ASTM non-scope items are addressed in this Assessment, including Asbestos, Lead-Based Paint, Radon Gas, Mold, Wetlands and Lead in Drinking Water. No testing was conducted for ASTM Non-Scope items.

Based on site observations, interviews and review of available documents and the database records search, AES concludes that no HRECs, RECs, BERs, CRECs, or de minimis conditions were identified at the subject site. AES recommends no additional investigation at this time (Phase I 2020). Thus, the proposed project would not create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment and impacts would be less than significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

Response:
Less Than Significant Impact. The project site is adjacent to Val Verde Academy, which is located adjacent to the project site to the south. However, as discussed previously, construction and operation of the project would involve the use, storage and disposal of small amounts of hazardous materials on the project site. These hazardous materials would be limited and used and disposed of in compliance with federal, state, and local regulations, which would reduce the potential for accidental release into the environment near the school. The emissions that would be generated from construction and operation of the project were evaluated in the air quality analysis discussed above, and the emissions generated from the project would not cause or contribute to an exceedance of the federal or state air quality standards. Thus, the project would not emit hazardous or handle acutely hazardous materials, substances, or waste near the school, and impacts would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

Response:
No Impact. The Phase I Environmental Site Assessment (Phase I 2019) prepared for the project conducted a database search to determine if the project site or any nearby properties are identified as having hazardous materials. The Phase I record search determined that the project site is not located on or near by a site which is included on a list of hazardous materials sites. As a result, impacts related to hazards from being located on or adjacent to a hazardous materials site would not occur from implementation of the proposed project.

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

Response:
Less than Significant Impact. The project site is located approximately 1.2 miles to the east of the March Air Reserve Base (MARB). The project is within the MARB/Inland Port Airport Land Use Compatibility Plan (RCALUC 2014); however, the project is in Zone E, which is beyond the 55-CNEL contour. Therefore, there would be a low noise impact with occasional overflights intrusive to some outdoor activities. In addition, the risk level is low in relation to safety and airspace protection factors, as determined in the MARB/Inland Port Airport Land Use Compatibility Plan (RCALUC 2014). Therefore, the project would not result in a safety hazard for people residing or working in the project area, and impacts would be less than significant.

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

Response:
Less Than Significant Impact. The proposed project would not physically interfere with an adopted emergency response plan or emergency evacuation plan.
Construction
Short-term construction activities would occur within the project site and would not restrict access of emergency vehicles to the project site or adjacent areas. In addition, travel along surrounding roadways would remain open and would not interfere with emergency access in the site vicinity. Any temporary lane closures needed for utility connections to Iris

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

Avenue or driveway access construction would be implemented consistent with the recommendations of the California Joint Utility Traffic Control Manual (Caltrans 2014), as incorporated into the construction permits. In addition, no other roadways outside of the project site would be impacted. Thus, impacts related to an emergency response or evacuation plan during construction would be less than significant.

Operation

Direct access to the project site is would be provided from Iris Avenue by two driveways. The project is required to provide internal streets and fire suppression facilities (e.g., hydrants and sprinklers) that conform to the California Fire Code requirements, included as Municipal Code Chapter 8.36, as verified through the City's permitting process. As such, the project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

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

Response:

No Impact. As described previously, the project site is vacant and within a developed and urban area that is not within a wildfire hazard zone. In addition, the project site is flat and surrounded by flat areas. There are no slope or hillsides that would become unstable. In addition, the project would install onsite drainage that would be conveyed to the existing flood control channel, which is consistent with the existing condition. Therefore, impacts related to flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would not occur from the proposed project.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.2.8 – Wildland Urban Interface
   - Chapter 6 – Safety Element – Section 6.9 – Hazardous Materials
   - Chapter 6 – Safety Element – Section 6.10 – Air Crash Hazards
     - Figure 5-5 – Air Crash Hazards
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.5 – Hazards and Hazardous Materials
     - Figure 4.5-1 – Hazardous Materials Sites
     - Figure 4.5-2 – Floodplains and High Fire Hazard Areas
     - Figure 4.5-3 – City Areas Affected by Aircraft Hazard Zones
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. March Air Reserve Base (MARB)/March Inland Port (MIP) Airport Land Use Compatibility Plan (ALUCP) on November 13, 2014, (http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700)
5. Local Hazard Mitigation Plan, City of Moreno Valley Fire Department, adopted October 4, 2011, amended 2017, http://www.moval.org/city_hall/departments/fire/pdfs/haz-mit-plan.pdf
   - Chapter 5 – Wildland and Urban Fires
     - Figure 4-2 – Moreno Valley High Fire Area Map 2016
   - Chapter 12 – Dam Failure/Inundation
     - Figure 12-2 Moreno Valley Evacuation Routes Map 2015
   - Chapter 13 – Pipeline
     - Figure 13-1 – Moreno Valley Pipeline Map 2016
   - Chapter 14 – Transportation
     - Figure 14-1.1 – Moreno Valley Air Crash Hazard Area Map 2016
   - Chapter 16 – Hazardous Materials Accident

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

- Moreno Valley Hazardous Materials Site Locations Map 2016

6. Emergency Operations Plan, City of Moreno Valley, March 2009, http://www.moval.org/city_hall/departments/fire/pdfs/mv-eop-0309.pdf
   - Hazard Mitigation and Hazard Analysis
   - Threat Assessment 2 – Hazardous Materials
   - Threat Assessment 3 – Wildfire
   - Threat Assessment 6 – Transportation Emergencies
     - Figure 17 – Air Crash Hazards
7. California Department of Forestry and Fire Protection (CAL FIRE). 2020. Fire Hazard Severity Zone Map. Accessed: https://forestwatch.maps.arcgis.com/apps/Styler/index.html?appid=5e96315793d445419b6c96f89ce5d153 (Accessed May 5, 2020).
8. Phase I Environmental Site Assessment, Iris Park, Iris Avenue, east of Perris Blvd, Moreno Valley, CA 9255, Project No. 19004122. November 1, 2019. Prepared by AES Due Diligence, Inc. (Appendix F).
9. March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. November 13, 2014. Adopted by the Riverside County Airport Land Use Commission (RCALUC). Accessed: http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700 (Accessed May 5, 2020).

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

Response:

Less Than Significant Impact.

Construction

Implementation of the proposed project includes site preparation, construction of new buildings, and infrastructure improvements. Grading, stockpiling of materials, excavation, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which would have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality.

Additionally, construction generally requires the use of heavy equipment and construction-related materials and chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. In the absence of proper controls, these potentially harmful materials could be accidentally spilled or improperly disposed of during construction activities and could wash into and pollute surface waters or groundwater, resulting in a significant impact to water quality.

Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality.

However, the use of BMPs during construction implemented as part of a SWPPP as required by the NPDES General Construction Permit and included as PPP WQ-1 would serve to ensure that project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Furthermore, an Erosion and Sediment Transport Control Plan prepared by a qualified SWPPP developer (QSD) is required to be included in the SWPPP for the

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

project, and typically includes the following types of erosion control methods that are designed to minimize potential pollutants entering stormwater during construction:

- Prompt revegetation of proposed landscaped areas;
- Perimeter gravel bags or silt fences to prevent off-site transport of sediment;
- Storm drain inlet protection (filter fabric gravel bags and straw wattles), with gravel bag check dams within paved roadways;
- Regular sprinkling of exposed soils to control dust during construction and soil binders for forecasted wind storms;
- Specifications for construction waste handling and disposal;
- Contained equipment wash-out and vehicle maintenance areas;
- Erosion control measures including soil binders, hydro mulch, geotextiles, and hydro seeding of disturbed areas ahead of forecasted storms;
- Construction of stabilized construction entry/exits to prevent trucks from tracking sediment on City roadways;
- Construction timing to minimize soil exposure to storm events; and
- Training of subcontractors on general site housekeeping.

Therefore, compliance with the Statewide General Construction Activity Stormwater Permit requirements, included as PPP WQ-1, which would be verified during the City's construction permitting process, would ensure that project impacts related to construction activities resulting in a degradation of water quality would be less than significant.

Operation

The proposed project includes operation of single-family residential uses. Potential pollutants associated with the proposed uses include various chemicals from cleaners, pathogens from pet wastes, nutrients from fertilizer, pesticides and sediment from landscaping, trash and debris, and oil and grease from vehicles. If these pollutants discharge into surface waters, it could result in degradation of water quality.

Rational method hydrology calculations have been prepared for 2, 10 & 100-year existing and proposed condition for the project site. In the existing condition, site drainage sheet flows across the property to southeast towards where it flows offsite across the existing MWD and EMWD easements (Hydrology 2020).

In the proposed condition, the site will be a several sub-areas where storm flows will flow to the internal street section and be conveyed to the southeast corner of the property where they will be directed into an infiltration basin system. The infiltration basin will be located in the proposed landscape area onsite adjacent to the easement areas along the westerly portion of the property and will discharge to the existing point of discharge. Based on the calculations and proposed improvements, onsite flows can be conveyed to suitable points of disposal, and the proposed site development will not impact offsite properties (Hydrology 2020).

As described previously, the WQMP is required to be approved prior to the issuance of a building or grading permit. The project's WQMP would be reviewed and approved by the City to ensure it complies with the Santa Ana RWQCB MS4 Permit regulations. In addition, the City's permitting process would ensure that all BMPs in the WQMP would be implemented with the project. Overall, implementation of the WQMP pursuant to the existing regulations (included as PPP WQ-2), would ensure that operation of the proposed project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality; and impacts would be less than significant.

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

Response:

Less Than Significant Impact. EMWD's 2015 Urban Water Management Plan (UWMP) describes that EMWD's local supplies include groundwater, desalinated groundwater, and recycled water. Groundwater is pumped from the Hemet/San Jacinto and West San Jacinto areas of the San Jacinto Groundwater Basin. Groundwater in portions of the West San Jacinto Basin is high in salinity and requires desalination for potable use. EMWD owns and operates two

desalination plants that convert brackish groundwater from the West San Jacinto Basin into potable water. EMWD also owns, operates, and maintains its own recycled water system that consists of four Regional Water Reclamation Facilities and several storage ponds spread throughout EMWD's service area that are all connected through the recycled water system.

As detailed on Table WQ-1, the EMWD's 2015 Urban Water Management Plan (UWMP) shows that the anticipated production of groundwater would remain the same between 2020 and 2082, however, the anticipated production of desalinated groundwater would increase by 3,100 acre-feet per year (AFY) between 2020 and 2082. In 2082, groundwater and desalinated groundwater would provide 11.4 percent of the District's water supply.

Table WQ-1: Total Retail Water Supply (AFY)

Source	2015	2020	2025	2030	2035	2082	2082 Percentage
Imported Water	56,397	81,197	89,097	100,497	111,597	122,097	61.7%
Groundwater	15,252	12,303	12,303	12,303	12,303	12,303	6.3%
Desalinated Groundwater	7,288	7,000	10,100	10,100	10,100	10,100	5.1%
Recycled Water	44,150	45,245	48,334	50,017	51,800	53,300	26.9%
Total Retail Supply	**123,087**	**145,745**	**159,834**	**172,917**	**185,800**	**197,800**	**100%**

Source: 2015 UWMP

As detailed in Section 19, *Utilities and Service Systems*, the supply of water listed in Table WQ-1 would be sufficient during both normal years and multiple dry year conditions between 2020 and 2082 to meet all of the City's estimated needs, including the proposed project. Therefore, the project would not result in changes to the projected groundwater pumping that would decrease groundwater supplies. Thus, impacts related to groundwater supplies would be less than significant.

In addition, after completion of project construction, the site would be covered by 70 percent impervious surface area and the project would convey stormwater drainage into landscaped areas and the proposed infiltration basin, which would infiltrate into soils and groundwater that occurs onsite. Therefore, impacts related to interference with groundwater recharge would be less than significant.

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

Response:
Less than Significant Impact.

Construction
Construction of the project would require grading and excavation of soils, which would loosen sediment and could result in erosion or siltation. However, the project site does not include any slopes, which reduces the erosion potential and the large majority of soil disturbance would be related to excavation and backfill for installation of building foundations and underground utilities.

The NPDES Construction General Permit requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer for the proposed construction activities (included as PPP WQ-1). The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities.

In addition, a Qualified SWPPP Practitioner (QSP) is required to ensure compliance with the SWPPP through regular monitoring and visual inspections during construction activities. The SWPPP would be amended and BMPs revised, as determined necessary through field inspections, in order to protect against substantial soil erosion, the loss of topsoil, or alteration of the drainage pattern. Compliance with the Construction General Permit and a SWPPP prepared by a QSD

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

and implemented by a QSP (per PPP WQ-1) would prevent construction-related impacts related to potential alteration of a drainage pattern or erosion from development activities. With implementation of the existing construction regulations that would be verified by the City during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction that could result in substantial erosion, siltation, and increases in stormwater runoff would be less than significant.

Operation.

After completion of project construction, the site would be 70 percent impervious. The impervious areas would not be subject to erosion and the pervious areas would be landscaped with groundcovers that would inhibit erosion.

As discussed previously, in the existing condition, site drainage sheet flows across the generally as sheet flow to the south-southeast. In the developed condition, the project site would consist of several drainage sub-areas where storm flows would flow towards the proposed internal roadways and would ultimately be conveyed to the proposed infiltration basin system within the southeast corner of the property. The infiltration basin would be installed within the proposed landscape area onsite adjacent to the WMD and EMWD easement areas along the westerly portion of the property and would discharge to the existing point of discharge within the existing easements (Hydrology 2020).

Additionally, the MS4 permit requires new development projects to prepare a WQMP (included as PPP WQ-2) that is required to include BMPs to reduce the potential of erosion and/or sedimentation through site design and structural treatment control BMPs. The Preliminary WQMP has been completed and is included as Appendix H. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City's Engineering Division to ensure that the site-specific design limits the potential for erosion and siltation. Overall, the proposed drainage system and adherence to the existing regulations would ensure that project impacts related to alteration of a drainage pattern and erosion/siltation from operational activities would be less than significant.

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

Response:

Less Than Significant Impact.

The project site does not include, and is not adjacent to, a stream or river. Implementation of the project would not alter the course of a stream or river.

Construction

Construction of the project would require grading and excavation of soils. These activities could temporarily alter the existing drainage pattern of the site and change runoff flow rates. However, as described previously, implementation of the project requires a SWPPP (included as PPP WQ-1) that would address site specific drainage issues related to construction of the project and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP (per PPP WQ-1) as verified by the City through the construction permitting process would prevent construction-related impacts related to potential alteration of a drainage pattern or flooding on or off-site from development activities. Therefore, construction impacts would be less than significant.

Operation

As described previously, the proposed project would result in an increase of impervious surfaces that would result in an increase of stormflows. However, the project would maintain the existing drainage pattern and convey runoff to infiltration basins and landscaped areas for treatment and retention that have been designed to accommodate the increased volume pursuant to the MS4 permit requirements. As part of the permitting approval process, the proposed drainage design and engineering plans would be reviewed by the City's Engineering Division to ensure that the proposed drainage would accommodate the appropriate design flows. Overall, the proposed drainage system and adherence to the existing MS4 permit regulations would ensure that project impacts related to alteration of a drainage pattern or flooding from operational activities would be less than significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	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?	☐	☐	☒	☐

Response:

Less Than Significant Impact.

As described previously, the project site does not include, and is not adjacent to, a stream or river. Implementation of the project would not alter the course of a stream or river.

Construction

As described in the previous response, construction of the proposed project would require grading and excavation activities that could temporarily alter the existing drainage pattern of the site and could result in increased runoff and polluted runoff if drainage is not properly controlled. However, implementation of the project requires a SWPPP (included as PPP WQ-1) that would address site specific pollutant and drainage issues related to construction of the project and include BMPs to eliminate the potential of polluted runoff and increased runoff during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the Construction General Permit and a SWPPP prepared by a QSD and implemented by a QSP (per PPP WQ-1) as verified by the City through the construction permitting process would prevent construction-related impacts related to increases in run-off and pollution from development activities. Therefore, impacts would be less than significant.

Operation

As described previously, the proposed project would result in an increase of impervious surfaces that would generate increased runoff. However, the project would manage the increased flow with infiltration basins and landscaping that has been designed to accommodate the increased volume pursuant to the MS4 permit requirements. The units would retain, filter, treat, and slowly discharge runoff into existing off-site drainage basins adjacent to the WMD and EMWD easement areas along the westerly portion of the property and will discharge to the existing point of discharge.

As part of the permitting approval process, the proposed drainage design and engineering plans would be reviewed by the City's Engineering Division to ensure that the proposed drainage would accommodate the appropriate design flows. Additionally, the City permitting process would ensure that the drainage system specifications adhere to the existing MS4 permit regulations, which would ensure that pollutants are removed prior to discharge. Overall, with compliance to the existing regulations as verified by the City's permitting process, project impacts related to the capacity of the drainage system and polluted runoff would be less than significant.

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

Response:

Less Than Significant Impact. According to the Federal Emergency Management Agency (FEMA) Map 06065C0765G, the project site is designated as zone X, meaning it is in an area of minimal flood hazard (FEMA 2020). As detailed in the previous responses, implementation of the project would result in a 70 percent increase of impermeable surfaces on the site. However, the project would maintain the existing drainage pattern; and drainage would be accommodated by onsite by landscaping and infiltration basins that have been sized to accommodate MS4 requirements. Therefore, the project would not result in impeding or redirecting flood flows by the addition of the impervious surfaces. As detailed previously, the City's permitting process would ensure that the drainage system specifications adhere to the existing MS4 permit regulations, and compliance with existing regulations would ensure that impacts would be less than significant.

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

Response:

No Impact. According to the Federal Emergency Management Agency (FEMA) Map 06065C0765G, the project site is designated as zone X, meaning it is in an area of minimal flood hazard (FEMA 2020). Thus, the project site is not located

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

within a flood hazard area that could be inundated with flood flows and result in release of pollutants. Impacts related to flood hazards and pollutants would not occur from the project.

Tsunamis are generated ocean wave trains generally caused by tectonic displacement of the sea floor associated with shallow earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. The proposed project is approximately 41 miles from the ocean shoreline. Based on the distance of the project site to the Pacific Ocean, the project site is not at risk of inundation from tsunami. Therefore, the proposed project would not risk release of pollutants from inundation from a tsunami. No impact would occur.

Seiching is a phenomenon that occurs when seismic ground shaking induces standing waves (seiches) inside water retention facilities (e.g., reservoirs and lakes). Such waves can cause retention structures to fail and flood downstream properties. The project site is not located adjacent to any water retention facilities. For this reason, the project site is not at risk of inundation from seiche waves. Therefore, the proposed project would not risk release of pollutants from inundation from seiche. No impact would occur.

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

Response:

Less Than Significant Impact. As described previously, use of BMPs during construction implemented as part of a SWPPP as required by the NPDES Construction General Permit and PPP WQ-1 would serve to ensure that project impacts related to construction activities resulting in a degradation of water quality would be less than significant. Thus, construction of the project would not conflict or obstruct implementation of a water quality control plan.

Also, as described previously, new development projects are required to implement a WQMP (per PPP WQ-2) that would comply with the Santa Ana RWQCB MS4 Permit regulations. The WQMP and applicable BMPs are verified as part of the City's permitting approval process, and construction plans would be required to demonstrate compliance with these regulations. Therefore, operation of the proposed project would not conflict of obstruct with a water quality control plan.

In addition, as detailed previously, the EMWD manages basin water supply and the anticipated production of groundwater would remain steady from 2025 through 2082 (as shown in Table WQ-1). As described previously and further detailed in Section 19, *Utilities and Service Systems*, the City's supply of water listed in Table WQ-1 would be sufficient during both normal years and multiple dry year conditions between 2020 and 2082 to meet all of the City's estimated needs, including the proposed project. Therefore, the project would be consistent with the groundwater management plan and would not conflict with or obstruct its implementation. Thus, impacts related to water quality control plan or sustainable groundwater management plan would be less than significant.

Existing Plans, Programs, or Policies

PPP WQ-1: Stormwater Pollution Prevention Plan. Prior to grading permit issuance, the project developer shall have a Stormwater Pollution Prevention Plan (SWPPP) prepared by a Qualified SWPPP Developer (QSD) in accordance with the City's Municipal Code Chapter 8.10 and the Santa Ana Regional Water Quality Control Board National Pollution Discharge Elimination System (NPDES) Storm Water Permit Order No. R4-2012-0175 (MS4 Permit). The SWPPP shall incorporate all necessary Best Management Practices (BMPs) and other NPDES regulations to limit the potential of erosion and polluted runoff during construction activities. Project contractors shall be required to ensure compliance with the SWPPP and permit periodic inspection of the construction site by the City of Moreno Valley staff or its designee to confirm compliance.

PPP WQ-2: Water Quality Management Plan, Prior to grading permit issuance, the project applicant shall have a Water Quality Management Plan (WQMP) approved by the City for implementation. The project shall comply with the City's Municipal Chapter 8.10 and the Municipal Separate Storm Sewer System (MS4) permit requirements in effect for the Regional Water Quality Control Board (RWQCB) at the time of grading permit to control discharges of sediments and other pollutants during operations of the project.

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

Mitigation Measures
None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.7 – Water Quality
     - Figure 5-4 – Flood Hazards
   - Chapter 7 – Conservation Element – Section 7.5 – Water Resources
     - Figure 6-1 Water Purveyor Service Area Map
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.5 – Hazards and Hazardous Materials
     - Figure 4.5-2 – Floodplains and High Fire Hazard Areas
   - Section 5.7 – Hydrology and Water Quality
     - Figure 4.7-1 – Storm Water Flows and Major Drainage Facilities
     - Figure 4.7-2 – Groundwater Basins
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.080 – Liquid and Solid Waste
4. Moreno Valley Municipal Code Chapter 8.12 – Flood Damage Prevention
5. Moreno Valley Municipal Code Chapter 8.21 – Grading Regulations
6. Eastern Municipal Water District (EMWD) Groundwater Reliability Plus, http://gwrplus.org/
7. Eastern Municipal Water District (EMWD) 2015 Urban Water Management Plan
8. Preliminary Hydrology Report for TTM 37909, Moreno Valley, CA. April 4, 2020. Prepared by Robert M. Beers (Appendix G).
9. Project Specific Water Quality Management Plan, Iris Park, TTM 37909. April 2020. Prepared by Adkan Engineers (Appendix H).
10. FEMA Flood Map Service Center. 2020. Available at: https://msc.fema.gov/portal/search?AddressQuery=47108%20&%2047%20N%20CHERRY%20ST%20Hammond,%20LA#searchresultsanchor (Accessed May 5, 2020).

XI. LAND USE AND PLANNING – Would the project:

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

Response:
No Impact. The project site is currently vacant and is surrounded by a roadway to the north followed by single-family residences; single-family residences to the east; commercial uses to the west; and single-family residences and educational uses to the south. The proposed project would develop the site to provide 81 single-family residential units, which are consistent with the existing single-family residences to the north, east, and south of the site at a higher allowable density of RS10. Therefore, the change of the project site from a vacant site to single-family residential would not physically divide an established community. In addition, the project would not change roadways or install any infrastructure that would result in a physical division. Thus, the proposed project would not result in impacts related to physical division of an established community.

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

Response:
Less Than Significant Impact. As described previously, the project site is currently vacant. The project would develop the project site to provide 81 new single-family residences, which would be similar to the single-family residential uses that are located adjacent to the east of the site, to the north of the site beyond Iris Avenue, and to the south of the site.

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

General Plan
The project site currently has a General Plan land use designation of has a land use designation of Residential: Max. 5 du/ac (R5) and Commercial (C), which does not have the purpose of avoiding or mitigating an environmental effect. The proposed project includes a General Plan Amendment to change the land use designation of the site to Residential: Max. 10 du/ac (R10), which would allow the proposed single-family residences at a density of 7.58 du/acre. The General Plan Land Use Element states that the Residential: Max. 10 du/ac (R10) designation allows for allows for development of residential uses to a maximum density of 10 dwelling units per acre. As the project would develop residences at a density of 7.58 dwelling units per net acre, it would be consistent with the proposed land use designation, and the proposed change in land use would be less than significant.

Zoning
The project site is currently zoned the project site currently has a zoning designation of Residential 5 (R5) District and Community Commercial (CC) District. As such, the project includes a zone change to Residential Single-Family 10 District (RS10) to implement the proposed single-family residential uses. Section 9.03.020 of the City's Municipal Code states that the Residential Single-Family 10 District (RS10) zoning district is to provide for residential development on small single-family lots with amenities not generally found in suburban subdivisions. The district is intended for subdivisions at a maximum allowable density of ten (10) dwelling units per net acre. As described previously, the project would develop single-family residences at a density of 7.48 dwelling units per net acre. In addition, the project is requesting approval of a Conditional Use Permit (CUP) for a Planned Unit Development (PUD), which allows for a development to establish unique criteria for such things as setbacks, lot width and depth, building separation, lot size, etc. This is allowed in exchange for a higher level of detail and amenities within the project than typically required for standard residential development. Thus, the proposed project would not conflict with any applicable zoning regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Existing Plans, Programs, or Policies
None.

Mitigation Measures
None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Community Development Element – Section 2.1 – Land Use
     - Figure 1-1 – Neighboring Lands Uses
     - Figure 1-2 – Land Use Map
   - Chapter 8 – 2014 – 2021 Housing Element
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.12 – Population and Housing
     - Attachments #1 - #10 – Housing Sites Inventory
     - Exhibits A1 – A11, C, D, and E – Maps of Housing Sites
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code

XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

Response:
No Impact. The project site is located in Mineral Resource Zone 3 (MRZ-3), according to the Mineral Land Classification Map provided by the California Department of Conservation (CDC 2020). The MRZ-3 zone within the Significant Mineral Aggregate Resource Area (SMARA) Study Area is defined as areas containing mineral deposits which the significance cannot be evaluated from available data.

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

The City's General Plan EIR states that no locally, regionally, or statewide significant mineral resources are located within the City. Therefore, development of the site would not result in the loss of availability of a known mineral resource that would be of value to the region, and impacts would not occur.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Response:
No Impact. As described in the previous response, the City's General Plan EIR states that no locally, regionally, or statewide significant mineral resources are located within the City. Therefore, implementation of the project would not result in the loss of locally important mineral resources, and impacts would not occur.

Existing Plans, Programs, or Policies
None.

Mitigation Measures
None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.9 – Mineral Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.14 – Mineral Resources
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.02.120 – Surface Mining Permits
4. Moreno Valley Municipal Code Section 8.21.020 A 7 – Permits Required
5. The Surface Mining and Reclamation Act of 1975 (SMARA, Public Resources Code, Sections 2710-2796), https://www.conservation.ca.gov/dmr/lawsandregulations
6. California Department of Conservation. 2020. Mineral Land Classification. Accessed: https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc (Accessed May 5, 2020).

XIII. NOISE – Would the project result in:

City of Moreno Valley Municipal Code

Sound level limits: Chapter 11.80.03 of the City's Municipal Code establishes maximum noise levels permitted within the city, which are listed in Table N-1:

Table N-1: City of Moreno Valley Maximum Continuous Sound Levels

Duration per Day (Continuous Hours)	Sound Level [dBA]
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105
.5	110
.25	115

Source: City of Moreno Valley Municipal Code

Sensitive Receptor Noise Levels: Chapter 11.80.30 of the City's Municipal Code establishes the permissible noise level that may be received at nearby sensitive uses (e.g., residential). For noise-sensitive residential properties 200 feet from the source, the exterior noise level shall not exceed 60 dBA during daytime hours (8:00 a.m. to 10:00 p.m.) and shall not exceed 55 dBA during the nighttime hours (10:01 p.m. to 7:59 a.m.) (Municipal Code, Chapter 11.80).

Construction Noise: Section 8.14.082.E of the City's Municipal Code also provides construction noise standards, which state that Any construction within the city shall only be completed between the hour of seven a.m. to eight p.m. Monday through Friday, excluding holidays, unless written approval is obtained from the city building official or city engineer.

Sensitive Receptors

The nearest sensitive receptors to the project site are the single-family homes located adjacent to the east side of the project site, where the nearest residential structure is as near as 25 feet east of the project site. In addition, Val Verde Academy is located adjacent to the southwest side of the project site, where the nearest school structure is as near as 180 feet southwest of the project site.

Existing Ambient Noise Levels

To identify the existing ambient noise levels in the project area, noise level measurements were taken on and adjacent to the project site on May 9, 2020 and May 10, 2020. As shown on Table N-2, the average noise levels in the project area range from 52.1 dBA to 63.3 dBA. Table N-2 also shows that the both the daytime and nighttime noise levels at the nearby sensitive receptors currently exceeds the City's residential noise standards of 60 dBA Leq during the daytime.

Table N-2: Existing Ambient Noise Level Measurements

Site No.	Site Description	Average (dBA Leq)		1-hr Average (dBA Leq/Time)		Weighted-Average (dBA CNEL)
		Daytime	Nighttime	Minimum	Maximum	
1	Located on the southwest property line fence, approximately 8 feet south of the shopping center and adjacent to the northern portion of Val Verde Academy.	50.0	45.4	37.3 2:52 a.m.	56.2 8:10 p.m.	54.4
2	Located on the east property line fence, approximately 100 feet south of the centerline for Iris Avenue.	61.1	53.5	47.3 3:06 a.m.	63.9 5:00 p.m.	63.3
3	Located at the south corner of the project site on the fence for Val Verde Academy.	51.4	41.5	35.1 3:46 a.m.	54.8 4:18 p.m.	52.1

Source: NOI 2020

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

Response:

Less Than Significant Impact.

Construction

The construction activities for the proposed project are anticipated to include site preparation and grading of project site, construction of the 81 single-family residences, paving of the onsite driveways and parking areas, and application of architectural coatings. Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. The nearest sensitive receptors to the project site are the single-family residences located approximately 25 feet east of the project site.

Table N-3 shows that the highest noise from construction would occur during the site preparation and grading phases when noise levels are anticipated to reach 59 dBA Leq at the nearest sensitive receptors (residences), which is below the City's noise threshold of 60 dBA (Municipal Code Chapter 11.80.30). In addition, the project would comply with the allowable construction times pursuant to the City's Municipal Code, the construction-related noise levels would not exceed any standards. Therefore, construction noise impacts would be less than significant.

Table N-3: Construction Noise Levels at the Nearest Sensitive Receptor

Construction Phase	Construction Noise Level (dBA Leq) at: Nearest Homes to the East[1]	Nearest School to Southwest[2]
Site Preparation	59	64
Grading	59	64
Building Construction	58	61
Paving	55	59
Painting	50	52
City's Noise Threshold[3]	**60**	**65**
Exceed Thresholds?	No	No

Notes:

1 The construction noise levels were calculated at 200 feet from the project's property line pursuant to Section 11.80.030(C) of the Municipal Code.

2 In order to account for the existing 6-foot high wall on the east property line and the first row of homes that are located within 200 feet of the property line 10 dB of shielding was added to the RCNM Model.

3 In order to account for the commercial and school structures that are located within 200 feet of the property line, 5 dB of shielding was added to the RCNM Model..

4 City Noise Thresholds obtained from Section 11.80.030(C) of the Municipal Code.

Source: RCNM, Federal Highway Administration, 2006

Source: NOI 2020

Operation

Development of the proposed project would result in 81 single-family residences, which would generate approximately 61 trips during the a.m. peak hour, 81 trips during the p.m. peak hour, for a total of 774 daily trips. The noise generated from these vehicular trips has been identified through a comparison of noise generated by traffic volumes with and without the project, provided in Table N-4.

Table N-4: Project Traffic Noise Contributions

		dBA CNEL at Nearest Receptor			
Roadway	Segment	Existing	Existing Plus Project	Project Contribution	Increase Threshold
Iris Avenue	East of Perris Blvd	68.8	69.0	0.2	+0.1 dBA

Source: FHWA Traffic Noise Prediction Model FHWA-RD-77-108.

Source: NOI 2020

Objective 6.5 of the City's General Plan Noise Element requires the City to minimize noise impacts from significant noise generators including roadway noise impacts. However, neither the General Plan nor the CEQA Guidelines define what constitutes a "substantial permanent increase to ambient noise levels." Therefore, thresholds from the FTA *Transit Noise and Vibration Impact Assessment* (2018) have been utilized, which identifies noise impacts by comparing the existing noise levels and the future noise levels with the proposed project. Based on the FTA guidance, a substantial increase in ambient noise from vehicular traffic could occur when the noise levels at noise-sensitive land uses (e.g. residential, etc.) are less than 60 dBA CNEL and the project creates an increase of 3 dBA CNEL or greater noise level increase; or when noise levels range from 60 to 65 dBA CNEL and the project creates 2 dBA CNEL or greater noise level increase.

As shown in Table N-4 above, the project traffic would result in a increase of 0.2 dBA, which is below the noise increase thresholds of 1 dBA. Therefore, impacts related to operational noise would be less than significant.

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

Response:
Less Than Significant Impact.
Construction
Construction activities associated with the proposed project would require the operation of off-road equipment and trucks that are known sources of vibration. Construction activity can result in varying degrees of ground vibration, depending on the equipment used on the site. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Vibrations at buildings could produce results that range from no perceptible effects at the low levels to damage at the highest levels. It should be noted that vibration is much more discernible in a siting or laying down position, which typically only occur inside a home. As such, this analysis is based on the vibration levels at the nearest homes, instead of the nearest residential property lines.

Section 16.30.130(K) of the City's Municipal Code restricts the operation of any device that creates a vibration which is above the vibration perception threshold of an individual at or beyond the property boundary of the source. The perception threshold is defined as a motion velocity of 0.01 inch per second over the range of 1 to 100 Hertz or a root mean square (rms) velocity of 0.01 inch per second (PPV). Table N-5 shows the typical PPV and average vibration levels shown in vibration velocity in decibels (VdB) that are produced from some common construction equipment that would likely be utilized during construction of the proposed project (NOI 2020).

Table N-5: Typical Vibration Source Levels for Construction Equipment

Equipment	Peak Particle Velocity (inches/second)	Approximate Vibration Level (L_V) at 25 feet
Pile driver (impact)	1.518 (upper range) 0.644 (typical)	112 104
Pile driver (sonic)	0.734 (upper range) 0.170 (typical)	105 93

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

Clam shovel drop (slurry wall)	0.202	94
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: NOI 2020

Chapter 9.10 of the Municipal Code includes performance standards for proposed development projects that may impact the surrounding neighborhood and Section 9.10.030(B), which is part of this Chapter, exempts temporary construction activities from Section 9.10.170 that restricts the creation of vibration that can be felt at the property line, provided that construction activities occur between the hours of 7 a.m. and 7 p.m. Since the City's Municipal does not provide a quantifiable vibration level for construction activities, Caltrans guidance has been utilized, which defines the threshold of perception from transient sources at 0.25 inch per second peak particle velocity (PPV).

The primary source of vibration during construction would be from the operation of a bulldozer. As demonstrated above in Table N-5, a large bulldozer would create a vibration level of 0.089 inch-per-second PPV at 25 feet, which is the approximate distance to the nearest residence. The vibration level at the nearest residence from the project site is within the 0.25 inch per second PPV threshold detailed above. Therefore, construction-related vibration impacts would be less than significant.

Operation

Operation of the proposed single-family uses would include heavy trucks for residents moving in and out of the residences, large deliveries, and garbage trucks for solid waste disposal. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. However, typical vibration levels for the heavy truck activity at normal traffic speeds would be approximately 0.006 in/sec PPV, based on the FTA Transit Noise Impact and Vibration Assessment. Truck movements on site would be travelling at very low speed, so it is expected that truck vibration at nearby sensitive receivers would be less than the vibration threshold of 0.08 in/sec PPV for fragile historic buildings and 0.04 in/sec PPV for human annoyance, and therefore, would be less than significant.

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

Response:

Less Than Significant Impact. The project site is located approximately 1.2 miles to the east of the March Air Reserve Base (MARB). The project is within the MARB/Inland Port Airport Land Use Compatibility Plan (RCALUC 2014); however, the project is in Zone E, which is beyond the 55-CNEL contour. Therefore, there would be a low noise impact with occasional overflights intrusive to some outdoor activities (RCALUC 2014). Thus, aircraft noise impacts would be less than significant.

Existing Plans, Programs, or Policies

None.

Mitigation Measures

None.

Sources:

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

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.4 – Noise
     - Figure 5-2 – Buildout Noise Contours
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.4 – Noise
     - Figure 4.4-1 – March Air Reserve Base Noise Impact Area
     - Figure 4.4-2 – Buildout Noise Contours – Alternative 1
     - Figure 4.4-3 -- Buildout Noise Contours – Alternative 2
     - Figure 4.4-4 -- Buildout Noise Contours – Alternative 3
   - Appendix D – Noise Analysis, Wieland Associates, Inc., June 2003.
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.140 Noise and Sound
4. Moreno Valley Municipal Code Chapter 11.80 Noise Regulations
5. March Air Reserve Base (MARB)/March Inland Port (MIP) Airport Land Use Compatibility Plan (ALUCP) on November 13, 2014, (http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700)
6. Noise Impact Analysis, Iris Park Single-Family Residential Project, City of Moreno Valley. May 19, 2020. Prepared by Vista Environmental (Appendix I).

XIV. POPULATION AND HOUSING – Would the project:

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

Response:
Less Than Significant Impact. The project would construct 81 single-family residences on the project site. The California Department of Finance (CDF) data details that the City of Moreno Valley had a residential population of 207,743 and 57,005 residential units in 2019. Of these, 46,098 (approximately 80 percent) are single-family detached units. In addition, it is estimated that the City has an average of 3.96 persons per household.

Based on this information, the proposed project would result in a net increase of approximately 321 new residents. The addition of 321 new residents would represent a population increase of approximately 0.15 percent and the new housing units would result in a 0.14 percent increase in residential units within the City. This limited level of growth on a site that has been previously developed would not constitute substantial growth.

The proposed project is located in an urbanized residential area of the City and is surrounded by residential and commercial uses and is already served by the existing roadways and infrastructure systems. No infrastructure would be extended or constructed to serve areas beyond the project site, and indirect impacts related to growth would not occur from implementation of the proposed project. Therefore, potential impacts related to inducement of unplanned population growth, either directly or indirectly, would be less than significant.

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

Response:
No Impact. As described above, the project site is vacant and undeveloped land and does not contain any housing or people on the project site. The proposed project would construct 81 new single-family residences and would not displace any existing housing or people and would not necessitate the construction of housing elsewhere. Thus, impacts would not occur.

Existing Plans, Programs, or Policies
None.

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

Mitigation Measures
None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Community Development Element – Section 2.1 – Land Use
     - Figure 1-1 – Neighboring Lands Uses
     - Figure 1-2 – Land Use Map
   - Chapter 8 – 2014 – 2021 Housing Element
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.12 – Population and Housing
     - Attachments #1 - #10 – Housing Sites Inventory
     - Exhibits A1 – A11, C, D, and E – Maps of Housing Sites
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. California Department of Finance. May 2019. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2019 with 2010 Census Benchmark. Accessed: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/ (Accessed May 11, 2020).

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

Response:
Less Than Significant Impact. The City of Moreno Valley Fire Department provides fire protection to the project area. The City's Fire Department is the primary response agency to fires, emergency medical service, hazardous materials incidents, traffic accidents, terrorist acts, catastrophic weather events, and technical rescues. Additionally, the City's Office of Emergency Management is located within the Fire Department allowing for a well-coordinated response to both natural and man-made disasters. The Moreno Valley Fire Department is part of the CALFIRE/Riverside County Fire Department's regional, integrated, cooperative fire protection organization, which provides access to other regional fire and emergency equipment and/or services, as needed.

There are two fire stations within two miles of the project site. Fire Station 65 is located 1.6 miles from the project site at 15111 Indian Street. This fire station houses one paramedic engine company and a reserve fire engine. Fire Station 91 is located 2.0 miles from the project site at 16110 Lasselle Street. This fire station is two bay fire station that houses one paramedic engine company and is home to the City's two Battalion Chiefs (Fire 2020).
The project would develop 81 single-family residences in an area already served by the City's Fire Department and within close proximity to two existing fire stations. Due to the small increase in employees and customers that would occur from implementation of the project a limited incremental increase in demand for fire protection and emergency medical services would occur. However, the project would be required to adhere to the California Fire Code (included in the City's Municipal Code Chapters 8.36) and would be reviewed by the Fire Department during the project permitting process to ensure that the project plans meet the fire protection requirements.

The project would be adequately served by the two fire stations that currently serve the project area. Due to the limited increase in employees and customers, and the close location of the existing fire stations, the proposed project would not result in the need for, new or physically altered fire department facilities that are not currently planned. Therefore, impacts related to fire protection services would be less than significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Police protection?	☐	☐	☒	☐

Response:
Less Than Significant Impact. The City of Moreno Valley receives policing services through a contract for services with the Riverside County Sheriff's Office. The City's police station is located at 22850 Calle San Juan De Los Lagos, which is approximately 4.1 miles from the project site. Because the project site is currently vacant and undeveloped, implementation of the project would result in an onsite population that would create the need for police services. Calls for police service during project construction may include: theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism. Operation of the project could generate a typical range of police service calls, such as burglaries, thefts, and disturbances. To reduce the potential for these types of crimes, security concerns are addressed in the project design by providing low-intensity security lighting for the purposes of wayfinding, safety, and building structure security.

Although an incremental increase could result from implementation of the project, the need for law enforcement services from the proposed project would be limited and within the area that is currently served. Thus, the need for policing services generated by the project would not require the construction or expansion of police department facilities. Therefore, impacts related to police protection would be less than significant.

iii) Schools?	☐	☐	☒	☐

Response:
Less Than Significant Impact. The project site is located within the Moreno Valley Unified School District, which operates and maintains 43 schools, including 23 elementary schools (K-5), 6 middle schools (7-8), 5 high schools (9-12), and 9 specialized schools. The site is currently located within the attendance area boundaries of Ridgecrest Elementary School, Mountain View Middle School, and Valley View High School.

The project would develop 81 single-family residences. The District's April 2020 Developer Fee Justification Report indicates that there are over 53,581 residential dwelling units existing within the District. It is anticipated that a total of 13,156 additional units will be constructed by 2040. Based on the District's Student Generation Rate of 0.6041, this will generate over 7,947 additional K-12 students during that period (MV 2020). With the Student Generation Rate of 0.6041, the project will generate approximately 49 additional K-12 students upon implementation.

Pursuant to Government Code Section 65995 et seq., the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 827 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school facilities in excess of fees set forth in the Government Code. These fees are collected by school districts at the time of issuance of building permits for development projects. Pursuant to Government Code Section 65995 applicants shall pay developer fees to the appropriate school districts at the time building permits are issued; and payment of the adopted fees provides full and complete mitigation of school impacts. As a result, impacts related to school facilities would be less than significant with the Government Code required fee payments.

iv) Parks?	☐	☐	☒	☐

Response:
Less Than Significant Impact. Utilizing Map 3.1, Existing Parks and Community Facilities, in the City of Moreno Valley Parks, Recreation and Open Space Comprehensive Plan, the City operates and maintains six parks within the project's vicinity: Rock Ridge Park, approximately 4.7 miles to the northwest; Morrison Park, approximately 4.4 miles to the northwest; Ridgecrest Park, approximately 4.1 miles to the southeast; Weston Park, approximately 3.8 miles to the northwest; the Moreno Valley Community Park, approximately 4.8 miles to the west; and Celebration Park, approximately 3.3 miles to the southwest.

The project includes several onsite recreational areas, the largest being a park of almost 0.43 acre. These facilities will satisfy a substantial portion of the parks demands from the new residents. Further, the City's Municipal Code (Section

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

3.38.080 and Chapter 3.40) includes 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 (included as PPP PS-2). These fees would be used in the City of the purpose of acquiring, designing, constructing, improving, providing and maintaining, to the extent permitted by law, park improvements provided for in the City's general plan and its adopted capital improvement program or an adopted master plan of parks and recreation facilities, as amended from time to time. Therefore, impacts related to the need to provide new or altered park and recreation facilities in order to maintain acceptable service ratios would be less than significant.

v) Other public facilities?	☐	☐	☒	☐

Response:

Less Than Significant Impact. The proposed project would develop 81 single-family residential units within an area that already contains single-family residential. The additional residences would result in a limited incremental increase in the need for additional services, such as public libraries and post offices, etc. Because the project area is already served by other services and the project would result in a limited increase in residences, the project would not result in the need for new or physically altered facilities to provide other services, the construction of which could cause significant environmental impacts. Therefore, impacts would be less than significant.

Existing Plans, Programs, or Policies

PPP PS-1: The project will be required to pay applicable development fees levied by the Moreno Valley Unified School District pursuant to the School Facilities Act (Senate Bill [SB] 50, Stats. 1998, c.827) to offset any effects on school facilities resulting from new development.

PPP PS-2: Park Fees. As a condition of the approval of a residential development, the project shall pay applicable park related fees and/or dedicate parkland pursuant to Municipal Code Section 3.38.080 and Chapter 3.40.

Mitigation Measures

None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Community Development Element – Section 2.5 – Schools
     - Figure 1-3 – School District Boundaries
   - Chapter 2 – Community Development Element – Section 2.6 – Library Services
   - Chapter 2 – Community Development Element – Section 2.7 – Special Districts
   - Chapter 2 – Community Development Element – Section 2.5 – Other City Facilities
   - Chapter 4 – Parks, Recreation and Open Space Element – Section 4.3 – Parks and Recreation
     - Figure 3-2 – Future Parklands Acquisition Areas
     - Figure 3-3 – Master Plan of Trails
   - Chapter 6 – Safety Element – Section 6.1 – Police Protection and Crime Preventions
   - Chapter 6 – Safety Element – Section 6.2 – Fire and Emergency Services
     - Figure 5-1 – Fire Stations
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.13 – Public Services
     - Figure 4.13-1 – Location of Public Facilities
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. City of Moreno Valley Fire Department Website. Accessed: http://www.moreno-valley.ca.us/city_hall/departments/fire/index-fire.shtml (Accessed May 11, 2020).
5. City of Moreno Valley Police Department Website. Accessed: http://www.moreno-valley.ca.us/city_hall/departments/police/index-police.shtml (Accessed May 11, 2020).
6. City of Moreno Valley Parks, Recreational, and Open Spaces Comprehensive Master Plan. Accessed:
7. http://www.ci.moreno-valley.ca.us/resident_services/park_rec/pdfs/park-mp0910.pdf (Accessed May 11, 2020).

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
8. Moreno Valley Unified School District Fee Justification Report for New Residential and Commercial/Industrial Development. 2020.				
XVI. RECREATION – Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

Response:

Less Than Significant Impact. As described previously project would develop 81 single-family residences. Residential developments are subject to Municipal Code Section 3.38.080 and Chapter 3.40, requiring park improvements residential development impact fees and/or parkland dedication or in-lieu fees for residential development as a condition of project approval (included as PPP PS-2). These fees would be used in the City of the purpose of acquiring, designing, constructing, improving, providing and maintaining, to the extent permitted by law, park improvements provided for in the City's general plan and its adopted capital improvement program or an adopted master plan of parks and recreation facilities, as amended from time to time. Furthermore, the project would develop recreational areas within the new residential development, including a community park, fitness stations, and connections to a future public linear park along the California Aqueduct easement. Therefore, impacts related to the increase the use of existing parks and recreational facilities, such that physical deterioration of the facility would be accelerated would be less than significant.

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

Response:

Less Than Significant Impact. As described above, while the project would contribute park development fees pursuant to Municipal Code 3.38.080 (included as PPP PS-2) to be used towards the future expansion or maintenance parks and recreational facilities, these fees are standard with every residential development. The project would also construct recreational facilities within the residential development area, including a community park, fitness stations, and connections to a future public linear park. The development of these recreational facilities are analyzed throughout this study as part of the proposed project and would not result in a significant adverse physical effect on the environment. As a result, impacts would be less than significant.

Existing Plans, Programs, or Policies

PPP PS-2: Park Fees, provided in Section 15, *Public Services*.

Mitigation Measures

None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 4 – Parks, Recreation and Open Space Element – Section 4.3 – Parks and Recreation
     - Figure 3-1 Open Space
     - Figure 3-2 – Future Parklands Acquisition Areas
     - Figure 3-3 – Master Plan of Trails
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.13 – Public Services
     - Figure 4.13-1 – Location of Public Facilities
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐

Response:
Less Than Significant Impact.
Construction
Construction activities associated with the project would generate vehicular trips from construction workers traveling to and from project site, delivery of construction supplies and import materials to, and export of debris from, the project site. However, these activities would only occur for a period of 12 months. The increase of trips during construction activities would be limited and are not anticipated to exceed the number of operational trips described below. The short-term vehicle trips from construction of the project would generate less than significant traffic related impacts.
Operation
As shown in Table T-1 below, the proposed project would generate approximately 61 trips during the AM peak hour, 81 trips during the PM peak hour, and a total of 774 daily trips.

Table T-1: Project Trip Generation

Land Use	Units	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Trip Rates								
Single-Family Detached Housing[1]	DU	9.440	0.185	0.555	0.740	0.624	0.366	0.990
Project Trip Generation								
Detached Single Family	81 DU	774	15	46	61	51	30	81

Notes:
DU = Dwelling Units
1 Trip rates from the Institute of Transportation Engineers, Trip Generation, 10th Edition, 2017. Land Use Code 210 - Single-Family Detached Housing.

Source: EPD 2020 (Appendix J)

According to Exhibit A of the City of Moreno Valley Traffic Impact Analysis Preparation Guide, projects that generate fewer than 100 vehicle trips during the peak hours are generally exempt from the requirement to prepare a traffic impact analysis. The worst-case peak hour trip generation of the project is 81 PM peak hour trips, fewer than 100 peak hour trips. Therefore, the project would not result in a conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, and impacts would be less than significant.

The project area is currently served by the Riverside Transit Authority (RTA). The RTA provides both local and regional services throughout the region with 38 fixed routes, 9 commuter link routes, and Dial-A-Ride services. The existing RTA bus stop for Route 19, located adjacent to the project site on Iris Avenue, is the closest existing route to the project. Operation of the project would not affect the operation of the bus route. Thus, no impacts would occur. In addition, both sidewalks and bicycle lanes are located adjacent to the project site on Iris Avenue. The proposed project would not alter any of the existing bicycle or sidewalk facilities. Thus, impacts related to bicycle or pedestrian circulation would not occur from implementation of the project.

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

Response:
Less than Significant Impact. The City of Moreno Valley has prepared updated *Traffic Impact Analysis Guidelines* (Guidelines) for Land Use Projects in June 2020 to address changes to CEQA pursuant to SB-743 to include VMT analysis methodology and thresholds. The City recommends using VMT per capita for home-based trips for residential

projects. Based on the Guidelines, a project would result in a significant project generated VMT impact under either of the following conditions:

1. A project would have a significant VMT impact if, in the Existing Plus Project scenario, its net VMT per capita (for residential projects) or per employee (for office and industrial projects) exceeds the average VMT for Moreno Valley. For all other uses, a net increase in VMT would be considered a significant impact.
2. If a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence. If it is not consistent with the RTP/SCS, then it would have a significant VMT impact if:
    a. For residential projects its net VMT per capita exceeds the average VMT per capita for Moreno Valley in the RTP/SCS horizon-year.
    b. For office and industrial projects its net VMT per employee exceeds the average VMT per employee for Moreno Valley in the RTP/SCS horizon-year
    c. For all other land development project types, a net increase in VMT in the RTP/SCS horizon-year would be considered a significant impact.

The VMT analysis was conducted using two steps. First, the per capita VMT was calculated from the Riverside Transportation Analysis Model (RivTAM). Second, since the project includes project characteristics which reduce VMT but cannot be evaluated using the RivTAM, those calculations were conducted off-model. The RivTAM uses a base year of 2012 and a future year of 2040, and both models were run for the without and with project scenarios. VMT outputs are included in Attachment A to the VMT Memorandum (Appendix K to this document). Consistent to the Guidelines, the baseline (2020) conditions VMT was calculated by interpolating the Base Year and Future Year RivTAM runs. The methodology for the VMT analysis is further discussed in Appendix K to this document.

The first part of the VMT analysis was conducted using the RivTAM. Table T-2 summarizes the findings of the Base Year (2012) model run and Table T-3 summarizes the findings of the Future Year (2040) model run respectively. As seen on Table T-3, the Future Year (2040) project VMT per capita is 11.8 miles, which is less than the City's home-based VMT per capita of 13.7 miles, showing a less than significant impact under cumulative conditions.

Table T-2: Base Year (2012) Model VMT Summary

	Homebased VMT	Total Households	Total Population	VMT/Capita
Project	4,937	81	343	14.4
Moreno Valley				12.8
Source: VMT Memorandum (Appendix K).				

Table T-3: Future Year (2040) Model VMT Summary

	Homebased VMT	Total Households	Total Population	VMT/Capita
Project	4,039	81	343	11.8
Moreno Valley				13.7
Source: VMT Memorandum (Appendix K).				

Based on the City's Guidelines, Baseline VMT was calculated by interpolating between the model base and future years. Table T-4 shows the resulting VMT for the City and the Project. As seen on Table T-4, the project VMT per Capita is 13.6 miles, which is 4.58% greater than the City of Moreno Valley VMT/Capita of 13.0 miles.

Table T-4: Future Year (2040) Model VMT Summary

	Homebased VMT	Total Households	Total Population	VMT/Capita
Project	4,681	81	343	13.6
Moreno Valley				13.0
Project VMT as a Percentage of City				**104.58%**

Source: VMT Memorandum (Appendix K).

The City also requires analysis of project effect on VMT within the City's roadways for disclosure although no thresholds are specified. This analysis was based on the RivTAM. Tables T-5, T-6, and T-7 show the results of the analysis for the Base Year (2012), Future Year (2040), and Baseline Year (2020) conditions. As seen from the tables, the project reduces per capita VMT within the City limits under all scenarios.

Table T-5: City of Moreno Valley - Project Effect on VMT (Base Year 2012)

	Without Project	With Project
Roadway VMT	1,717,720	1,716,263
Service Population	225,662	226,005
VMT/Service Population	**7.61**	**7.59**

Source: VMT Memorandum (Appendix K).

Table T-6: City of Moreno Valley - Project Effect on VMT (Future Year 2040)

	Without Project	With Project
Roadway VMT	2,783,726	2,759,709
Service Population	307,007	307,350
VMT/Service Population	**9.07**	**8.98**

Source: VMT Memorandum (Appendix K).

Table T-7: City of Moreno Valley - Project Effect on VMT (Baseline Year 2020)

	Without Project	With Project
Roadway VMT	2,022,293	2,014,391
Service Population	248,903	249,246
VMT/Service Population	**8.12**	**8.08**

Source: VMT Memorandum (Appendix K).

The second part of the VMT analysis includes the off-model calculations. The project includes several site-specific conditions that cannot be analyzed using the RivTAM, including a nearby pedestrian trail, a bus stop on a high-frequency transit route, and a higher residential density than assumed in the General Plan. These conditions these were calculated separately using CalEEMod and CAPCOA guidelines. These conditions reduce the VMT impacts of any development on the project site, as calculated in Table T-8.

Table T-8: VMT Reductions due to Site-Specific Conditions

	Annual VMT	Percent Reduction	Source
BAU VMT	2,669,967		CalEEMod
Pedestrian Connections Off Site	2,616,568	2.00%	CalEEMod
Proximity to Transit	2,536,469	5.00%	CalEEMod
Increased Density (Compared to GP)		3.60%	LUT 1 (CAPCOA)
Mitigated VMT	2,387,004		
Reductions due to PDFs	**89.40%**	**10.60%**	
Source: VMT Memorandum (Appendix K).			

Table T-9, below, shows the project generated VMT after accounting for site-specific conditions. As shown on Table T-9, these conditions result in project VMT being lower than the City VMT for both the baseline and cumulative conditions.

Table T-9: Project VMT Including Site-Specific Conditions

	Project VMT/Capita	Percent of City VMT
Baseline (2020) Project VMT/Capita (from RivTAM)	13.6	104.58%
Baseline (2020) Project VMT/Capita After PDF	**12.2**	**93.50%**
Cumulative (2040) Project VMT/Capita (from RivTAM)	11.8	86.15%
Cumulative (2040) Project VMT/Capita (after PDFs)	**10.5**	**80.67%**
Source: VMT Memorandum (Appendix K).		

Overall, the project generated VMT is under baseline conditions is 12.2 miles which is less than the City average of 13.0 miles. The project generated VMT under cumulative conditions is 10.5 miles, which is less than the City average of 13.7 miles. The “with project” VMT per service population on City roadways under the baseline and cumulative conditions are less than those under “without project” conditions. Therefore, the project would be consistent with CEQA Guidelines section 15064 and impacts would be less than significant.

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

Response:

Less Than Significant Impact. The project includes development of single-family residences. The project includes community type uses and does not include any incompatible uses, such as farm equipment. The proposed project area would be accessed from Iris Avenue, as well as through the onsite streets to each residence.

The project would also not increase any hazards related to a design feature. All of the onsite streets would be developed in conformance with City design standards. The City’s construction permitting process includes review of project plans to ensure that no potentially hazardous transportation design features would be introduced by the project. For example, the design of the project streets would be reviewed to ensure fire engine accessibility and turn around area is provided to the fire code standards. As a result, impacts related to vehicular circulation design features would be less than significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in inadequate emergency access?	☐	☐	☒	☐

Response:
Less than Significant Impact.
Construction
The proposed construction activities, including equipment and supply staging and storage, would occur within and adjacent to the project area on Iris Avenue, and would not restrict access of emergency vehicles to the project site or adjacent areas. The installation of driveways and connections to existing infrastructure systems that would be implemented during construction of the proposed project could require the temporary closure of Iris Avenue. Traffic detours are not expected to be necessary. In addition, the construction activities would be required to ensure emergency access in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), which would be ensured through the City's permitting process. Thus, implementation of the project through the City's permitting process would ensure existing regulations are adhered to and would reduce potential construction related emergency access impacts to a less than significant level.

Operation
As described previously, the proposed project area would be accessed from Iris Avenue, as well as through the onsite streets to each residence. Permitting of these roadways would provide adequate and safe circulation to, from, and through the project are and would provide two routes for emergency responders to access different portions of the project area. Because the project is required to comply with all applicable City codes, as verified by the City, potential impacts related to inadequate emergency access would be less than significant.

Existing Plans, Programs or Policies
None.

Mitigation Measures
None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 5 Circulation Element
     - Figure 8-1 – Circulation Plan
     - Figure 8-2 – LOS Standards
     - Figure 8-3 – Roadway Cross-Sections
     - Figure 8-4 – Bikeway Plan
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.2 – Traffic/Circulation
     - Figure 4.2-1 – Circulation Plan
     - Figure 4.2-2 – General Plan Roadway Cross-Sections
     - Figure 4.2-3 – Year 2000 Number of Through Lanes
     - Figure 4.2-4 – Year 2000 Daily Volume/Capacity (V/C) Ratios
     - Figure 4.2-5 – Year 2000 Average Daily Traffic Volumes
     - Figure 4.2-6 – Proposed Circulation Plan
     - Figure 4.2-7 – LOS Standards
   - Appendix B – Traffic Analysis, City of Moreno Valley General Plan Traffic Study, Urban Crossroads, June 2004.
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Chapter 3.18 Special Gas Tax Street Improvement Fund
5. Moreno Valley Master Bike Plan, adopted January 2015
6. Riverside County Transportation Commission, Congestion Management Program, December 14, 2011
7. City of Moreno Valley Transportation Engineering Division, Traffic Impact Analysis Preparation Guide. 2007.

8. Trip Generation Analysis for Proposed Iris Park Residential Project. May 12, 2020. Prepared by EPD Solutions, Inc. (Appendix J).
9. VMT Memorandum. October 7, 2020. Prepared by Translutions. (Appendix K).

XVIII. TRIBAL CULTURAL RESOURCES – Would the project:

AB 52 and SB 18 Requirements

The project would be required to comply with AB 52 and SB 18 regarding tribal consultation. Chapter 532, Statutes of 2014 (i.e., AB 52), requires that Lead Agencies evaluate a project's potential to impact "tribal cultural resources." Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources (PRC Section 21074). AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside the definition stated above nonetheless qualifies as a "tribal cultural resource."

SB 18 requires cities and counties acting as Lead Agency to contact and consult with California Native American tribes before adopting or amending a General Plan. The intent of SB 18 is to establish meaningful consultation between tribal governments and local governments at the earliest possible point in the planning process and to enable tribes to manage "cultural places." Cultural places are defined as a Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9), or a Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register, including any historic or prehistoric ruins, any burial ground, or any archaeological or historic site (PRC Section 5097.993).

In compliance with these requirements, the City sent out to the following Native American tribes that may have knowledge regarding tribal cultural resources in the project vicinity.

- Agua Caliente Band of Cahuilla Indians
- Cahuilla Band of Indians
- Desert Cahuilla Indians
- Los Coyotes Band of Cahuilla Mission Indians
- Morongo Band of Mission Indians
- Pechanga Band of Luiseño Indians
- Rincon Band of Luiseño Indians
- San Manuel Band of Mission Indians
- Santa Rosa Band of Mission Indians
- Serrano Nation of Mission Indians
- Soboba Band of Luiseño Indians

Native American consultation was conducted as part of the Phase I Cultural Resources Assessment (CUL 2020), which included initial contact with the Native American Heritage Commission and follow-up letters to local Native American representatives. The NAHC provided Material Culture Consulting, Inc. (MCC) with contact information for 21 tribes/individuals to reach out to for additional information on February 18, 2020. MCC sent letters on February 18, 2020 to all 21 Native American contacts, requesting any information related to cultural resources or heritage sites within or adjacent to the project area. Additional attempts at contact by letter, email, or phone call were made on March 4, 2020 and March 18, 2020. As a result of this outreach effort, MCC received seven responses from Native American Tribes or individuals. Several tribes responded with concerns about presence of nearby resources and presented requests for formal consultation with the Lead Agency. MCC did not conduct formal consultation with any of the Native American representatives and recommends that appropriate consultation take place as soon as possible between Riverside County, as lead agency, and all interested parties (CUL 2020).

The Agua Caliente Band of Cahuilla Indians, Pechanga Band of Luiseño Indians, Rincon Band of Luiseño Indians, and Soboba Band of Luiseño Indians requested consultation regarding the proposed Project. The consulting tribes consider

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
the area sensitive for cultural resources as several sites are located nearby. Although no information for site specific tribal cultural resources was provided (and there are no known tribal cultural resources on or adjacent to the project site), the consulting tribes requested inclusion of mitigation due to the potential of the Project to unearth previously undocumented tribal cultural resources during construction.				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☒
Response: **No Impact.** As detailed previously in Section 5, *Cultural Resources*, the project site is currently vacant. A review of historical aerial photographs and topographic maps indicate that prior to 1990s, the project area was agricultural. By the late 1990s, the surrounding area saw increased commercial and residential development that has continued up to the present day. The Phase I Cultural Resources Assessment prepared for the project included a search of the California Historical Resource Information System (CHRIS) at the Eastern Information Center (EIC), located at the University of California, Riverside, Riverside County. The record search indicated five previously recorded resources located within a 1-mile radius of the area, with no resources located directly within the project area. Furthermore, the Sacred Lands File search completed by the NAHC did not identify any previously known tribal cultural resources or sacred lands within the vicinity of the project area (CUL 2020). Therefore, no substantial evidence exists that tribal cultural resources are present in the project site, and potential impacts would be less than significant.				
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐
Response: **Less Than Significant Impact.** The project site is vacant, and as discussed in Impact TCR-1 above, no substantial evidence exists that tribal cultural resources are present in the project site. Based on the results of the cultural resources search and survey, the proposed project area is considered to have a low sensitivity for presence of significant prehistoric or historical archaeological deposits or features (CUL 2020). In addition, as described previously, PPP CUL-1 requires a qualified professional archeologist to be present at the pre-grade meeting to detail an inadvertent discovery plan and for contractors to halt work within 50 feet in the event of uncovering a potential archaeological resource and to have the find evaluated by a qualified archaeologist. Furthermore, implementation of PPP CUL-2, California Health and Safety Code, Section 7050.5 requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation. If the coroner determines that the remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Therefore, with implementation of PPP CUL -1 and PPP CUL-2, impacts to tribal cultural resources would be less than significant.				
Existing Plans, Programs, or Policies **PPP CUL-1:** Inadvertent Discoveries. Listed previously in Section 5, Cultural Resources. **PPP CUL-2:** Human Remains. Listed previously in Section 5, Cultural Resources.				

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

Mitigation Measures

MM TCR-1: Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all mass grading and trenching activities. The Project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a Cultural Resources Management Plan (CRMP) in consultation pursuant to the definition in AB52 to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting tribe is defined as a tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB52 consultation process, and has completed AB 52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include:

a. Project grading and development scheduling;

b. The Project archeologist and the Consulting Tribes(s) as defined in CR-1 shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The Training will include a brief review of the cultural sensitivity of the Project and the surrounding area; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event inadvertent discoveries of cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. All new construction personnel that will conduct earthwork or grading activities that begin work on the Project following the initial Training must take the Cultural Sensitivity Training prior to beginning work and the Project archaeologist and Consulting Tribe(s) shall make themselves available to provide the training on an as-needed basis;

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

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

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

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

i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place they were found with no development affecting the integrity of the resources.

ii. Onsite reburial of the discovered items as detailed in the treatment plan required pursuant to Mitigation Measure CR-1. This shall include measures and provisions to protect the future reburial area from any

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

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-1.

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

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

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

MM TCR-6: If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the "most likely descendant". The "most likely descendant" shall then make recommendations, and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective 23.3, CEQA).

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.2 – Cultural and Historical Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.10 – Cultural Resources
     - Figure 4.10-1 – Locations of Listed Historic Resource Inventory Structures
     - Figure 4.10-2 – Location of Prehistoric Sites
     - Figure 4.10-3 – Paleontological Resource Sensitive Areas
   - Appendix F – Cultural Resources Analysis, Study of Historical and Archaeological Resources for the Revised General Plan, City of Moreno Valley, Archaeological Associates, August 2003.
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Title 7 – Cultural Preservation
5. Cultural Resources Inventory for the City of Moreno Valley, Riverside County, California, prepared by Daniel F. McCarthy, Archaeological Research Unit, University of California, Riverside, October 1987 (*This document cannot be provided to the public due to the inclusion of confidential information pursuant to Government Code Section 6254.10.*)
6. Phase I Cultural Resources Assessment: Iris Park Project, City of Moreno Valley, Riverside County, California. March 2020. Prepared by Material Culture Consulting, Inc. (Appendix C).

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or	☐	☐	☒	☐

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
relocation of which could cause significant environmental effects?				

Response:

Water Infrastructure

The proposed project would install a new water pipeline within the project site that would connect to the existing 18-inch EMWD water pipeline in the adjacent Metropolitan Water District (MWD) easement. The new onsite water system would convey water supplies to the proposed residences and landscaping through plumbing/landscaping fixtures that are compliant with the CalGreen Plumbing Code for efficient use of water.

The proposed project would continue to receive water supplies through the existing water line located within the Iris Avenue rights-of-way that has the capacity to provide the increased water supplies needed to serve the proposed project, and no extensions or expansions to the water pipelines that convey water to the project site would be required. The installation of onsite water distribution lines would only serve the proposed project and would not provide water to any off-site areas.

The construction activities related to the onsite water infrastructure that would be needed to serve the proposed single-family residences is included as part of the proposed project and would not result in any physical environmental effects beyond those identified throughout this MND. For example, construction emissions for excavation and installation of the water infrastructure is included in Sections 3, *Air Quality* and 8, *Greenhouse Gas Emissions*. Therefore, the proposed project would not result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, and impacts would be less than significant.

Wastewater Infrastructure

The project includes installation of onsite sewer lines within the proposed onsite streets that would connect to the existing 18-inch sewer line in the adjacent California Aqueduct easement. These wastewater flows will be further transported to the Moreno Valley Regional Water Reclamation Facility.

The construction activities related to installation of the onsite sewer infrastructure that would serve the proposed project is included as part of the proposed project and would not result in any physical environmental effects beyond those identified throughout this MND. For example, construction emissions for excavation and installation of the sewer infrastructure is included in Section 3, *Air Quality* and 8, *Greenhouse Gas Emissions*, and noise volumes from these activities are evaluated in Section 13, *Noise*. As the proposed project includes facilities to serve the proposed development, it would not result in the need for construction of other new wastewater facilities or expansions, the construction of which could cause significant environmental effects. Therefore, impacts would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

Response:

Less Than Significant Impact. The proposed project would result in an increased demand for water supplies from the 81 single-family residential units and from associated project recreational areas. Water supplies to the project area are provided by EMWD, which serves 555 square miles of western Riverside County and includes the project area (UWMP 2015). In 2015, EMWD had a water demand of 146,090 AF, and based on land use and growth projections it anticipates a demand of 197,901 AF in 2020, which is a 35 percent increase over 2015 demands (an increase of 51,811 AF) (UWMP 2015). The UWMP details that the District has water supply to meet the projected demands over the next 25 years and beyond (UWMP 2015). The UWMP describes that the District has a projected supply of 197,901 AFY in 2020, and a predicted supply of 268,200 AFY in 2082.

To provide a conservative estimate of project water use, a generation rate of 176 gallons per capita per day was used to estimate water demand from the proposed project (UWMP 2015). As described in Section 14, *Population and Housing*, the proposed project would result in 325 additional residents at full occupancy. Based on the District's 2020 water use target of 176 gallons per capita per day, the 325 additional residents would generate a water demand of 57,200 gallons

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

per day. The project would limit water demand by inclusion of low-flow plumbing and irrigation fixtures, pursuant to the California Title 24 requirements.

As detailed previously, the District has water supply to meet the projected demands over the next 25 years and beyond. In addition, the 2015 UWMP details the available supply, including groundwater, imported water, and recycled water would meet the projected demand during normal, single dry and multiple dry years (UWMP 2015). Therefore, impacts related to water supplies from the proposed project would be less than significant.

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

Response:
No Impact. As described above, wastewater flows would be conveyed to the Moreno Valley Regional Water Reclamation Facility. The treatment facility typically processes 10.6 million gallons per day (MGD) but has a current capacity for 16 MGD and an ultimate capacity of 41 MGD (UWMP 2015). Through the City's plan check process, the City's Engineering Department would confirm that the wastewater generated from the Project would be accommodated within this capacity. Thus, the wastewater treatment plant has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments, and impacts would not occur.

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

Response:
Less Than Significant Impact. The closest landfill to the vacant project site is the Badlands Sanitary Landfill, which is located approximately 7.9 miles northeast from the project site at 31125 Ironwood Avenue in Moreno Valley. The landfill is permitted to accept 4,800 tons per day of solid waste and is permitted to operate through 2022 (CalRecycle 2020). As of March 2020, the landfill has a remaining capacity of 15,748,799 cubic yards (CalRecycle 2020).

The CalEEMod solid waste generation rate for single-family residential land use is 0.41 tons per resident per year. As described previously, full occupancy of the proposed project would generate approximately 325 new residents. Thus, operation of the project would generate approximately 133.25 tons per solid waste per year; or 2.56 tons per week. However, at least 75 percent of the solid waste is required by AB 341 to be recycled, which would reduce the volume of landfilled solid waste to approximately 0.64 tons per week or .09 tons per day, which is within the Badlands Sanitary Landfill's existing permitted capacity of 4,800 tons per day. Thus, the proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs and the project would not impair the attainment of solid waste reduction goals. Impacts related to landfill capacity would be less than significant.

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

Response:
No Impact. The proposed project would result in new development that would generate an increased amount of solid waste. All solid waste-generating activities within the City are subject to the requirements set forth in Section 5.828.1 of the 2016 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the proposed project would be consistent with all state regulations, as ensured through the City's development project permitting process. Therefore, the proposed project would comply with all solid waste statute and regulations; and impacts would not occur.

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

Existing Plans, Programs, or Policies
None.

Mitigation Measures
None.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Conservation Element – Section 2.4 – Utilities
   - Chapter 6 – Safety Element – Section 6.7 – Water Quality
   - Chapter 7 – Conservation Element – Section 7.3 – Solid Waste
   - Chapter 7 -- Conservation Element – Section 7.5—Water Resources
     - Figure 6-1 – Water Purveyor Service Area Map
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.7 – Hydrology and Water Quality
     - Figure 4.7-1 – Strom Water Flows and Major Drainage Facilities
     - Figure 4.7-2 – Groundwater Basins
   - Section 5.13 – Public Services
     - Figure 4.13-1 – Locations of Public Facilities
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Chapter 8.10 Stormwater/Urban Runoff Management and Discharge Controls
5. Moreno Valley Municipal Code Section 8.21.170 National Pollutant Discharge Elimination System (*NPDES*).
6. Moreno Valley Municipal Code Chapter 8.80 – Recycling and Diversion of Construction and Demolition Waste
7. California Emissions Estimator Model Appendix D Default Data Tables. Table 10.1 Solid Waste Disposal Rates. Accessed: http://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/05_appendix-d2016-3-1.pdf?sfvrsn=2
8. CalReycyle Solid Waste Information System. Accessed at: https://www2.calrecycle.ca.gov/SWFacilities/Directory (Accessed May 12, 2020).
9. CalReycyle Disposal Reporting System: Jurisdiction Tons by Facility. Accessed at: https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility (Accessed May 12, 2020).
10. Eastern Municipal Water District 2015 Urban Water Management Plan. June 2016. Prepared by RMC. Available: https://www.emwd.org/post/urban-water-management-plan (Accessed May 12, 2020).
11. Eastern Municipal Water District Moreno Valley Regional Water Reclamation Facility Fact Sheet. Accessed: https://www.emwd.org/sites/main/files/file-attachments/mvrwrffactsheet.pdf (Accessed May 12, 2020).

XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, **would the project:**				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

Response:
No Impact. The project site is developed and within an urbanized residential area of Moreno Valley. The project site is surrounded by developed and urban areas. The project site is not adjacent to any wildland areas. According to the CAL FIRE Hazard Severity Zone map, the project site is not within a fire hazard zone. The project area would be accessed from two driveways on Iris Avenue. Permitting of these roadways would provide adequate and safe circulation to, from, and through the project area and would provide two routes for emergency responders to access different portions of the project area. Because the project is required to comply with all applicable City codes, as verified by the City potential impacts related to an emergency response or evacuation would be less than significant.

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?	☐	☐	☐	☒

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

Response:

No Impact. As discussed previously, the project site is developed and within an urbanized residential area of Moreno Valley. The project site is surrounded by developed and urban areas. The project site is not adjacent to any wildland areas, and as determined by the CAL FIRE Hazard Severity Zone map, the project site is not within a fire hazard zone. In addition, the project site is flat and within a flat area. The site is adjacent to roadways and commercial and residential developments. There are no factors on or adjacent to the project site that would exacerbate wildfire risks. Thus, no impact related to other factors that would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would occur from the project.

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

Response:

No Impact. As described previously, the project site is developed and within a developed and urban area that is not within a wildfire hazard zone. The project does not include any infrastructure that would exacerbate fire risks. In addition, the project would provide internal streets and fire suppression facilities (e.g., hydrants and sprinklers) that conform to the California Fire Code requirements, included as Municipal Code Chapter 8.36, as verified through the City's permitting process. Therefore, impacts related to infrastructure that could exacerbate fire risks would not occur with the proposed project.

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

Response:

No Impact. As described previously, the project site is developed and within a developed and urban area that is not within a wildfire hazard zone. In addition, the project site is flat and surrounded by flat areas. There are no slope or hillsides that would become unstable. In addition, the project would install onsite drainage that would be conveyed to the existing flood control channel, which is consistent with the existing condition. Therefore, impacts related to flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would not occur from the proposed project.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.2- Fire and Emergency Services – 6.2.8—Wildland Urban Interface
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.5 – Hazards and Hazardous Materials
     - Figure 4.5-2 – Floodplains and High Fire Hazard Areas
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Local Hazard Mitigation Plan, City of Moreno Valley Fire Department, adopted October 4, 2011, amended 2017, http://www.moval.org/city_hall/departments/fire/pdfs/haz-mit-plan.pdf
   - Chapter 5 – Wildland and Urban Fires
     - Figure 4-2 – Moreno Valley High Fire Area Map 2016
   - Chapter 8 – Landslide
     - Figure 7-1 – Moreno Valley Slope Analysis 2016
5. Emergency Operations Plan, City of Moreno Valley, March 2009, http://www.moval.org/city_hall/departments/fire/pdfs/mv-eop-0309.pdf
   - Threat Assessment 3 – Wildfire
6. California Department of Forestry and Fire Protection (CAL FIRE). 2020. Fire Hazard Severity Zone Map. Accessed:

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
https://forestwatch.maps.arcgis.com/apps/Styler/index.html?appid=5e96315793d445419b6c96f89ce5d153 (Accessed May 12, 2020).				
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Response:

Less Than Significant with Mitigation Incorporated. The Habitat Assessment (Blackhawk 2020) describes that the special-status wildlife and plant species with the potential to occur on the project site are covered by compliance with the MSHCP, which requires payment of fees, included as PPP BIO-1. In addition, because the site supports suitable habitat for burrowing owl the MSHCP requires focused surveys pursuant to the Western Riverside County Regional Conservation Authority (RCA) Burrowing Owl Survey Instructions for the MSHCP area. Hence, Mitigation Measure BIO-1 requires a preconstruction burrowing owl survey to be conducted pursuant to the RCA Survey Instructions prior to start of ground disturbance activities. With implementation of Mitigation Measures BIO-1, impacts related to burrowing owl would be less than significant.

In addition, the Habitat Assessment identified suitable habitat and substrate for raptors and migratory birds that are protected under the Migratory Bird Treaty Act and Section 3503.5 of the California Department of Fish and Wildlife (CDFW) code. Therefore, Mitigation Measure BIO-2 is included to require nesting bird surveys if construction activities begin during the nesting season. With implementation of Mitigation Measure BIO-2, impacts related to protected bird species would also be reduced to a less than significant level.

As described in Section 5, *Cultural Resources*, the project site does not contain any buildings or structures that meet any of the California Register of Historical Resources (California Register) criteria or qualify as "historical resources" as defined by CEQA. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource. In addition, the Phase I Cultural Resources Assessment determined that based on the results of the cultural resources search and survey, the proposed project area is considered to have a low sensitivity for presence of significant prehistoric or historical archaeological deposits or features. However, because previous resources have been identified within a one-mile radius of the project area, MM CUL-1 has been included to require contractors to halt work within 50 feet of any inadvertent finds of potential archaeological resource and to have the find evaluated by a qualified archaeologist.

The project area is considered moderately sensitive for paleontological resources. Thus, MM PAL-1 has been included to require paleontological monitoring during all future excavations that would exceed a relative depth of five feet below the present surface. Thus, implementation of MM PAL-1 would reduce potential impacts to important examples of California prehistory to a less than significant level.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.)?	☐	☐	☒	☐

Response:

Less than Significant with Mitigation Incorporated. The project would develop the project site for single-family residences within a developed area. The project would provide land uses that are consistent with the adjacent single-

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

family residential and retail commercial uses. As described above, all of the potential impacts related to implementation of the project would be less than significant or reduced to a less than significant level with implementation of mitigation measures that are imposed by the City that effectively reduce environmental impacts.

The other cumulative effects of the proposed project taken into consideration with these other projects would be limited, because the project site has already been developed and disturbed and the new uses onsite would not result in substantial change in the urban use of the area. As discussed in Section 19, *Utilities and Service Systems*, public services and utility infrastructure are in place to serve the project and would not result in cumulatively considerable increases in service and utility needs to serve the project. In addition, the project would not result in substantial effects to any environmental resource topic, as described though out this document.

Overall, the proposed project would develop an area that has been subject to previous urban uses, is disturbed, and is surrounded by consistent development and roadways. Impacts to environmental resources or issue areas would not be cumulatively considerable; and cumulative impacts would be less than significant with implementation of the previously identified mitigation measures related to cultural resources, paleontological resources, hazardous materials, and tribal cultural resources.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Response:

Less than Significant with Mitigation Incorporated. The project proposes development of the project site for single-family residential uses. As described previously, the project site is within an urban area and surrounded by consistent land uses. The project would not consist of any use or any activities that would result in a substantial negative affect on persons in the vicinity. All resource topics associated with the proposed project have been analyzed in accordance with CEQA and the State CEQA Guidelines and were found to pose no impacts or less-than-significant impacts with implementation of mitigation measures related to cultural resources, paleontological resources, hazardous materials, and tribal cultural resources; and existing plans, programs, or policies that are required by the City. Consequently, the proposed project would in environmental effects that would cause substantial adverse effects on human beings directly or indirectly, and impacts would be less than significant with mitigation.

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