



Chapter 6

Project Alternatives

The California Environmental Quality Act (CEQA) Guidelines Section 15126.6 requires that an Environmental Impact Report (EIR) compare the effects of a “reasonable range of alternatives” to the effects of a project. The CEQA Guidelines further specify that the alternatives selected should attain most of the basic project objectives and avoid or substantially lessen one or more significant effects of the project. The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency, and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines “feasible” to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

6.1 Selection of Alternatives

Chapter 4.0 of this PEIR provided a detailed analysis of 20 environmental issue areas for which the project, which consists of the 2021 General Plan Update (GPU), Housing Element Update, and Climate Action Plan (CAP), could have a significant effect on the environment. The project would result in significant and/or cumulative environmental impacts related to air quality, agricultural resources, biological resources, cultural and tribal cultural resources, noise, and transportation. In developing the alternatives to be addressed in this chapter, consideration was given regarding their ability to meet the basic objectives of the project and their potential to eliminate or substantially reduce those significant environmental impacts.

The following specific objectives support the underlying purpose of the project, assist the City as Lead Agency in developing a reasonable range of alternatives to evaluate in this EIR (EIR),

and will ultimately aid the Lead Agency in preparing findings and overriding considerations. The following specific objectives have been established for the project:

- Provide a flexible land use framework that can accommodate job growth in a variety of industries over time while enhancing quality of life in the community;
- Build a strong, diverse economy with well-paying jobs in the city for local residents, reducing the need for long commutes and achieving a better balance of jobs-to-housing;
- Ensure a sustainable, measured rate of growth and efficient delivery of public services;
- Create a destination Downtown Center that makes Moreno Valley a destination city with a modern, innovative brand and that will help establish Moreno Valley as a model community where people choose to live, work, and play;
- Focus new residential and commercial development in corridors to support more frequent and reliable transit service; promote walking and biking; and reduce vehicle miles travelled;
- Foster development of gateways at key entry points into the community that announce arrival with attractive architecture and inviting uses to build Moreno Valley's sense of place;
- Facilitate development of a range of housing options that provides for the needs of current and future residents, including people of all ages, abilities, and incomes levels;
- Accommodate the City's 2021-2029 Regional Housing Needs Allocation (RHNA) allocation;
- Reduce community-wide greenhouse gas emissions consistent with statewide targets;
- Foster vibrant gathering places for locals and visitors to shop, dine, do business, and have fun, providing a range of social interaction opportunities for youth, families, and seniors;
- Enhance neighborhood livability through promoting active lifestyles with indoor and outdoor recreational amenities and prioritizing clean air, water, fresh food, and community health; and
- Encourage mindful stewardship of water, energy, and other environmental resources, and explore technological advancements as a way to enhance current/future needs and lifestyles.

The alternatives addressed in this PEIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would feasibly accomplish most or all of the basic objectives of the project;
- The extent to which the alternative would avoid or substantially lessen any of the identified significant environmental effects of the project.

- The appropriateness of the alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice; and
- The requirement of the CEQA Guidelines to consider a “no project” alternative; and to identify an “environmentally superior” alternative in addition to the no project alternative (Section 15126.6[e]).

Based on the criteria described above, this PEIR considers the following project alternatives:

- No Project Alternative;
- Reduced Growth Alternative; and
- Redistributed Growth Alternative.

6.2 Comparison of Impacts

General descriptions of the characteristics of each alternative, along with a discussion of their ability to reduce significant environmental impacts associated with the project, are provided in the following subsections. Table 6-1 provides a side-by-side comparison of the potential impacts of the alternatives to the impacts of the project.

Environmental Issue Area	Project	No Project Alternative	Reduced Growth Alternative	Redistributed Growth Alternative
Aesthetics	LTS	Greater/LTS	Similar/LTS	Similar/LTS
Agriculture and Forestry Resources	SU	LTS/SU	LTS/SU	LTS/SU
Air Quality	SU	Greater/SU	LTS/SU	LTS/SU
Biological Resources	SU	LTS/SU	LTS/SU	LTS/SU
Cultural and Tribal Cultural Resources	SU	LTS/SU	LTS/SU	Similar/SU
Greenhouse Gas Emissions	LTS	Greater/SU	LTS/SU	LTS/SU
Land Use/Planning	LTS	Greater/SU	Similar/LTS	Similar/LTS
Noise	SU	Greater/SU	LTS/SU	LTS/SU
Transportation	SU	Greater/SU	LTS/SU	LTS/SU

LTS = less than significant; SU = significant and unavoidable

The following issue areas were found to result in less than significant impacts in this EIR and the impact of each of the alternatives would not be significantly different; thus, they are not discussed in further detail:

- Energy
- Geology/Soils
- Hazards & Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Population/Housing
- Public Services and Recreation
- Utilities/Service Systems
- Wildfire

6.3 No Project Alternative

6.3.1 Description

Under the No Project Alternative, the proposed amendments to the adopted General Plan, Housing Element Update, and adoption of the CAP would not occur. Growth in the city would continue to be guided by the existing land use plans and programs. Specifically, a summary of existing land uses is provided in Table 4.11-1, with existing land uses shown on Figure 4.11-1. Under the No Project Alternative, development would continue to occur through site-specific rezoning and General Plan amendment actions, rather than through a comprehensively planned approach. The planned densities needed to accommodate the region's housing and provide the required levels of affordability would not occur. Planning for mobility infrastructure would continue as it currently exists, without a comprehensive strategy intended to reduce reliance on vehicular travel and promote other forms of mobility.

6.3.2 Analysis

6.3.2.1 Agricultural Resources

The project would result in the conversion of agricultural uses within the Concept Areas (those areas where the GPU proposes land use changes as shown on Figure 3-1) to urban uses. Maximum impacts to mapped farmland with the Concept Areas is shown in Table 4.2-2. The loss of designated farmland, both directly and indirectly within the Concept Areas and throughout the Planning Area, would be considered a significant impact. Feasible mitigation that would meet the objectives of the project does not exist to mitigate direct and cumulative impacts to important farmland to a level less than significant, because the conservation of farmland would be inconsistent with the proposed 2021 GPU goals and updated land use map. Therefore, impacts to agricultural resources would be significant and unavoidable.

The No Project Alternative would maintain the existing General Plan policies and land use map. The existing agricultural policies are focused on retention of agricultural open space for economically viable agricultural options. However, agricultural operations have continued to be disincentivized and no longer reflect economic opportunities for the City since adoption of the existing 2006 General Plan. Farming uses in the Planning Area are limited to intermittent farming activities north of State Route 60 (SR-60) in the northeast portion of the City. Under the No Project Alternative, development would continue consistent with the existing 2006 General Plan land use plan and policies. The existing 2006 General Plan foresaw that agricultural operations may become less important to the City's economic success, and while swaths of Prime Farmland are mapped within the Planning Area, there is no agricultural land use designation on the existing 2006 General Plan land use map. It is conceivable that as land develops under the existing 2006 General Plan, more urban uses would replace agricultural operations. Like the project, no feasible mitigation would exist to reduce these impacts. Therefore, impacts related to agricultural resources would remain significant and unavoidable, and would be less than the project.

6.3.2.2 Air Quality

The project would not exceed the assumptions used to develop the Air Quality Management Plan (AQMP) and the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. The scale and extent of construction activities associated with buildout of the Planning Area could exceed the relevant South Coast Air Quality Management District (SCAQMD) thresholds for some projects, and impacts associated with criteria pollutants during construction were determined to be significant and unavoidable. The project would not expose sensitive receptors to substantial pollutant concentrations, and would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people.

The No Project Alternative would constitute buildout of the existing 2006 General Plan. As described in Section 4.3 above, buildout of the existing 2006 General Plan would generate 4,566,084 VMT. In comparison, this would be greater than buildout of the project, which would generate 4,524,038 VMT. Buildout of the existing 2006 General Plan would generate greater VMT because the existing land use plan does not focus future development and redevelopment within clusters of vacant and underutilized land, as under the 2021 GPU land use plan. Therefore, buildout of the existing 2006 General Plan would generate more VMT compared to buildout of the project, which in turn would result in greater vehicle emissions. As shown in Table 4.3-4, buildout of the existing 2006 General Plan would generate greater emissions when compared to buildout of the 2021 GPU. Section 4.3 determined that the project would have significant and unavoidable impacts associated with criteria pollutants during construction. Construction activities associated with buildout of the existing 2006 General Plan could similarly generate short-term criteria pollutant emissions that would exceed the SCAQMD's significance thresholds and cumulatively contribute to the nonattainment designations of the Basin. Therefore, impacts related to air quality would remain significant and unavoidable, and would be greater than the project due to the increase amount of VMT-generated emissions.

6.3.2.3 Biological Resources

Undeveloped lands located throughout the Planning Area are typically comprised of disturbed lands and non-native grasses with small pockets of riparian vegetation occurring within urban canyons as shown in Figure 4.4-1. Native habitats and species are largely limited to areas around the city where lands are in proximity to surrounding conserved natural areas including the San Jacinto Wildlife Area. Known locations of sensitive plants within the city are presented in Figure 4.4-2, and summarized in Table 4.4-2. Specifically, sensitive plants within the city are limited to the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)-covered species, southern California black walnut (*Juglans californica*) in the northeastern portion of the City and smooth tarplant (*Centromadia pungens* ssp. *laevis*), within the eastern portion of the city. Locations of sensitive wildlife observations within the city are primarily located to the southeast, adjacent to the Lake Perris State Recreation Area, as well as some areas along the eastern and northern boundaries of the City. Although the project has been designed to minimize impacts

to sensitive species by primarily focusing future development and redevelopment within the Concept Areas, buildout under the project would result in potentially significant direct and indirect impacts due to habitat removal within the Concept Areas and throughout the Planning Area. Future site-specific projects would be required to adhere to applicable federal, state and local regulations that provide protections for sensitive species as part of the discretionary approval process for individual development projects. Additionally, a mitigation framework is included to be implemented with the project. However, it is not possible at the program level of analysis to ensure that every impact could be fully mitigated. Therefore, impacts to sensitive habitat and species, and impacts to riparian and jurisdictional wetlands, are determined to remain significant and unavoidable.

Under the No Project Alternative, development would continue consistent with the existing 2006 General Plan land use plan and policies. Vacant lands and those supporting sensitive habitat could be developed consistent with the City's existing land use plan. It is conceivable that as land develops under the City's existing plan, impacts to on-site habitat and species would be removed, resulting in potentially significant impacts to biological resources. At the time of the processing of future site-specific projects, site-specific general biological resource surveys would be required to identify the presence of any sensitive biological resources, including any sensitive plant or wildlife species, and further identify the need for additional protocol/focused surveys for wetlands and/or other known sensitive species. Additionally, future site-specific projects would be required to avoid breeding season construction if there is the potential to remove habitat or mature trees known to support sensitive species of birds. While implementation of such measures would generally serve to reduce impacts to less than significant levels, no site-specific projects have been identified at this time, and it is not possible to ensure that future development could fully mitigate potentially significant impacts despite the applicable regulatory framework. Therefore, impacts to biological resources would remain significant and unavoidable, and would be less than the project.

6.3.2.4 Cultural and Tribal Cultural Resources

Review of the records search from Eastern Information Center (EIC) and recent aerial photographs identified 48 historic resources that are presented in Table 4.5-1. Of the 48 historic resources that were identified within the Planning Area, eight were determined to be significant (see Section 4.5.1.4.a). Additionally, a search of the EIC identified 255 archaeological resources located throughout the Planning Area. Nine of the identified archaeological resources have been previously recommended eligible for the listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). Forty resources have been recommended not eligible for the NRHP/CRHR. Four resources have been destroyed by construction and the remaining 202 resources have not been evaluated and should be considered potentially significant.

As shown in Figure 4.5-1, the proposed Concept Areas would avoid the majority of the known historic or potentially historic resources within the Planning Area. Nevertheless, the proposed Residential Density Change Concept Area located south of Sunnymead Boulevard and east of Heacock Street would overlap with the location of one resource identified as significant, and two resources recommended eligible for the NRHP. Future development and

redevelopment outside of the proposed Concept Areas consistent with the existing 2006 General Plan land use designations would also have the potential to impact known historic or potentially historic resources, including unrecorded historical resources that have not been evaluated or may become eligible for listing in the future. Furthermore, implementation of the project would have the potential to impact significant archeological and/or Tribal cultural resources which would be considered a significant impact. A mitigation framework is included to be implemented with the project; however, it is not possible to ensure at a program level of analysis that every impact could be fully mitigated. Therefore, impacts to cultural and tribal cultural resources would remain significant and unavoidable.

Under the No Project Alternative, development would continue consistent with the existing 2006 General Plan land use designations. The development of currently vacant land, and redevelopment of projects throughout the Planning Area would have the potential to impact known historic or potentially historic resources, including those resources that have not been evaluated or may become eligible for listing in the future. Furthermore, development within vacant lands may result in indirect impacts to the visual and setting integrity to significant historic resources. Like the proposed mitigation framework, future development under the No Project Alternative would be required to implement site-specific historic structural evaluations of on-site buildings that may qualify as historic resources. Additionally, future development would be required to prepare site-specific archaeological surveys and develop project-specific measures as necessary. While implementation of such mitigation measures would generally serve to reduce impacts to less than significant levels, no site-specific projects have been identified at this time, and it is not possible to ensure that every future site-specific project could fully mitigate potentially significant impacts despite the application of mitigation measures. Therefore, impacts to cultural and Tribal cultural resources under the No Project Alternative would remain significant and unavoidable, and would be less than the project.

6.3.2.5 Noise

Under the project, changes to land uses throughout the Concept Areas, coupled with buildout of the city, would result in the increase in ambient noise levels adjacent to a number of roadway segments (see Table 4.13-12) that would likely remain at levels that would expose existing noise-sensitive receptors to ambient noise levels that would be significant. Because the significant noise impacts would be to existing homes and other noise-sensitive uses in an already urbanized area, there is no feasible mitigation, and impacts would remain significant and unavoidable.

Noise/land use compatibility impacts would occur as shown in Figure 4.13-4. Specifically, significant land use compatibility impacts would result due to future vehicle traffic noise within the Downtown Center and Highway Office/Commercial Concept Areas, as well as within the areas targeted for increased residential density, including between Sunnymead Boulevard, and Cottonwood Avenue; Heacock Street, and Perris Boulevard; south of Ironwood Avenue and north of SR-60 along Moreno Beach Drive; and southwest of the intersection of Krameria Avenue and Perris Boulevard. Proposed 2021 GPU policies would be implemented to reduce significant noise impacts, including that all future development

located in areas where exterior noise levels exceed the land use compatibility standards as defined in the 2021 GPU Noise Element would require site-specific interior noise analyses demonstrating compliance with the interior noise standards of Title 24 and the proposed 2021 GPU. These requirements for site-specific noise analyses would be implemented through submission of a Title 24 Compliance Report to demonstrate interior noise levels of 45 community noise equivalent level (CNEL), ensuring that noise impacts associated with new development would be less than significant.

Construction-related noise and vibration impacts associated with any individual development under the project may occur near noise-sensitive receptors resulting in a significant impact. The project includes a mitigation framework focused on the reduction of construction and vibration-related noise impacts which would be implemented by future site-specific projects. However, while vibration related impacts would be reduced to less than significant levels, general construction noise impacts to existing homes and other noise-sensitive uses in an already urbanized area would remain significant and unavoidable.

The No Project Alternative would retain the existing 2006 General Plan, and development throughout the city would remain consistent with the existing land use map. The Planning Area is currently subject to typical urban noises such as noise generated by traffic, heavy machinery, and day-to-day outdoor activities. Existing ambient noise levels throughout the Planning Area range as high as 74.8 one-hour equivalent (L_{eq}). As shown in Figure 4.13-2, existing noise levels at areas located closest to the roadways exceed 60 CNEL. The No Project Alternative would generate a greater amount of VMT compared to the project, which could generate greater levels of ambient noise. Future site-specific projects would be required to adhere to regulatory standards, existing 2006 General Plan policies, and mitigation requiring site-specific noise analyses. However, it is not possible to ensure that every future site-specific project could fully mitigate potentially significant impacts despite the application of mitigation measures and adherence to regulatory standards. Therefore, impacts associated with noise under the No Project Alternative would remain significant and unavoidable, and would be greater than the project.

6.3.2.6 Transportation

Buildout of the existing 2006 General Plan would generate 4,566,084 VMT. In comparison, this would be greater than buildout of the project, which would generate 4,524,038 VMT. Buildout of the existing 2006 General Plan would generate greater VMT because the existing land use plan does focus future development and redevelopment within clusters of vacant and underutilized land, as under the 2021 GPU land use plan. Therefore, buildout of the existing 2006 General Plan would generate VMT compared to buildout of the project. Furthermore, buildout of the existing 2006 General Plan would not include roadway widening proposed under the project would improve traffic conditions, and therefore may result in congestion that could interfere with emergency access and response. Therefore, impacts related to transportation would remain significant and unavoidable, and would be greater than the project.

6.3.2.7 Issues Found Less than Significant in the EIR

As detailed in Section 6.2 above, impacts associated with a number of environmental topics were found to be less than significant in the EIR. For most of these issues, implementation of the No Project Alternative would also result in generally the same less than significant impact, with the exception of greenhouse gas (GHG) emissions, aesthetics, and land use and planning. Implementation of the No Project Alternative would not include implementation of a CAP and, therefore, would not provide new policy to guide the City toward GHG emission reductions. Absent implementation of a CAP and the associated policy framework, it is assumed that the City would not reduce GHG emissions to the same degree as projected under the project. Therefore, impacts related to GHG emissions under the No Project Alternative would be significant and unavoidable.

Impacts related to aesthetics under the No Project Alternative are anticipated to be greater than the project in the absence of the comprehensive goals and policies that define the character and visual quality of future development in the city. However, since existing General Plan policies would remain in place, impacts are assumed to be less than significant.

Impacts related to land use and planning under the No Project Alternative are anticipated to be greater than under the project. Under the No Project Alternative, the City would not implement various City planning initiatives such as creating new vibrant town centers. Additionally, the Housing Element Update would not be implemented, which would conflict with state requirement and would not achieve housing targets. Finally, the project would not implement a new Mobility Element and CAP to ensure compliance with SB 743 and state GHG reduction targets. The project would also support growth to meet 2040 SCAG projections. Therefore, impacts related to land use and planning under the No Project Alternative would be significant and unavoidable.

6.3.3 Conclusions

As shown in Table 6-1, the No Project Alternative would result in the same significant and unavoidable impacts associated with agricultural resources, air quality, biological resources, cultural and tribal cultural resources, noise, and transportation. However, due to the reduced intensity of employment opportunities and residential density that would occur under the existing 2006 General Plan, impacts related to agricultural resources, biological resources, and cultural and tribal cultural resources would be incrementally less compared to the project. Impacts related to air quality, noise, and transportation would be greater under the No Project Alternative because buildout of the existing 2006 General Plan would generate a greater amount of VMT. The No Project Alternative would also result in significant and unavoidable impacts related to GHG emissions and land use and planning that would be avoided with the project. Furthermore, the No Project Alternative would not meet any of the project objectives.

6.4 Reduced Growth Alternative

6.4.1 Description

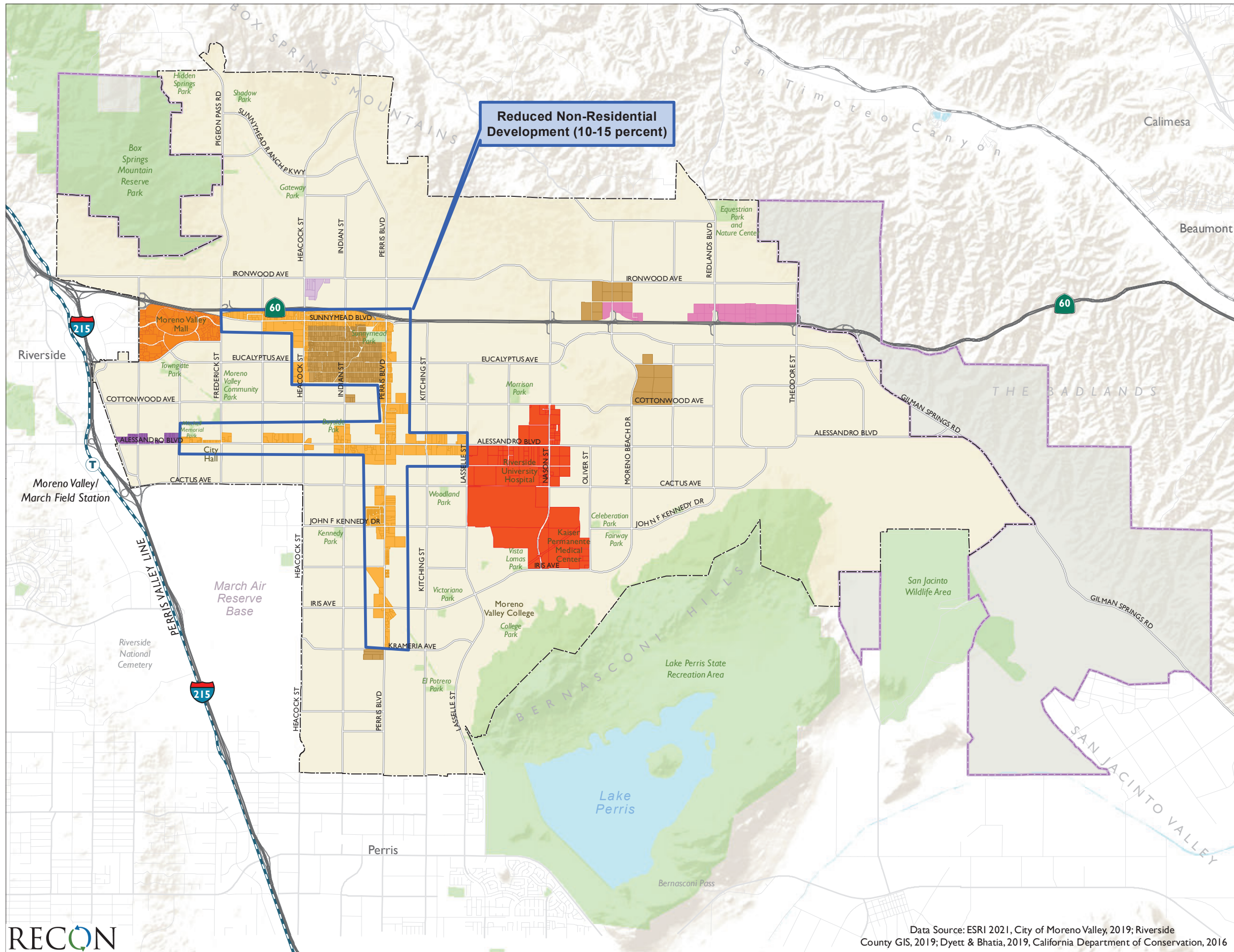
The Reduced Growth Alternative would revise the proposed land use map to reduce the amount of employment growth compared to the project (Figure 6-1). This alternative would reduce the maximum permitted floor area ratio (FAR) proposed within the Community Corridors along Sunnymead Boulevard, Alessandro Boulevard, Perris Boulevard, and Heacock Street. This would reduce the amount of non-residential development within these Community Corridors by approximately 10 to 15 percent compared to the project. This alternative would also remove the proposed Center Mixed Use within the District Specific Plan area, and reduce the footprint of the Downtown Center Concept Area by approximately 111 acres. Additionally, a portion of proposed Highway Office/Commercial Concept Area located north of SR-60 would not receive this new designation, and instead the existing office and residential land use designations from the existing 2006 General Plan would be retained.

6.4.2 Analysis

6.4.2.1 Agricultural Resources

Under the project, agriculturally designated land within the Concept Areas would be converted to urban uses. These conversions would consist primarily of land designated as Farmland of Local Importance within the Downtown Center, and Highway Office/Commercial Concept Area, as well as approximately 15 acres of Prime Farmland within the Highway Office/Commercial Concept Area. The loss of Prime Farmland within the Highway Office/Commercial Concept Area, as well as indirect loss throughout the Planning Area, would be considered significant and unavoidable.

The Reduced Growth Alternative would remove a portion of the Highway Office/Commercial Concept Area that is located on soils designated as Prime Farmland. However, this area, and others that are located on soils designated as Prime Farmland, could still be developed under their current land use designations established under the existing 2006 General Plan. While development would be less intense and could result in incrementally less conversion of existing Prime Farmland, the loss of agriculturally designated lands would be considered significant. There would be no feasible mitigation that would reduce the impact to a less than significant level. Therefore, impacts to agricultural resources under the Reduced Growth Alternative would remain significant and unavoidable, and would be less than the project.



- City of Moreno Valley
- Sphere of Influence
- General Plan Concept Areas**
- Mixed Use**
 - Downtown Center
 - Center Mixed Use
 - Corridor Mixed Use
- Commercial/Office/Industrial**
 - Highway Office/Commercial
 - Business Park/Light Industrial
 - Business Flex
- Residential**
 - Residential Density Changes

FIGURE 6-1
Reduced Growth Alternative

6.4.2.2 Air Quality

The project would not exceed the assumptions used to develop the AQMP, and the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. The project would not expose sensitive receptors to substantial pollutant concentrations, and would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people. The scale and extent of construction activities associated with buildout of the Planning Area could exceed the relevant SCAQMD thresholds for some projects, and impacts associated with criteria pollutants during construction were determined to be significant and unavoidable.

The Reduced Growth Alternative would reduce the amount of non-residential development within the proposed Community Corridors by approximately 10 to 15 percent compared to the project, and some portions of the Downtown Center and Highway Office/Commercial Concept Areas would retain their current land use designations. This would result in a reduction of development and VMT that would further ensure that this alternative would not exceed the assumptions used to develop the AQMP, and would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. Similarly, the reduction in development would reduce emissions even further than the project, and thereby further avoid exposure of sensitive receptors to substantial pollutant concentrations, and further avoid potential impacts associated with odors. However, the scale and extent of construction activities associated with buildout under this alternative could exceed the relevant SCAQMD thresholds for some projects, and impacts associated with criteria pollutants during construction. Therefore, impacts related to air quality under the Reduced Growth Alternative would remain significant and unavoidable, and would be less than the project.

6.4.2.3 Biological Resources

As shown in Figure 4.4-6, sensitive vegetation communities located within the Concept Areas include primarily grassland and coastal Sage Scrub, as well as a small area mapped as “water.” Additionally, riparian scrub is identified just outside the Downtown Center Concept Area. Development under the project would result in a loss of these habitats. While a mitigation framework is proposed, it is not possible to ensure that every impact could be fully mitigated at a program level of analysis. Therefore, the loss of sensitive habitat, both directly and indirectly, within the Concept Areas and throughout the Planning Area, would be considered significant and unavoidable.

The Reduced Growth Alternative would reduce the footprints of the Downtown Center and Highway Office/Commercial Concept Areas that has the potential to support sensitive species. However, these areas could still be developed under their current land use designations established under the existing 2006 General Plan. While development would be less intense and could result in an incrementally reduced impact to biological resources, impacts to sensitive species would be considered significant. Like the project, without specific development plans, there is no certainty that the implementation of mitigation measures

would reduce the impact to a level less than significant. Therefore, impacts to biological resources under the Reduced Growth Alternative would remain significant and unavoidable, and would be less than the project.

6.4.2.4 Cultural and Tribal Cultural Resources

Figure 4.5-1 presents the locations of known historic resources within the Planning Area, while Figure 4.5-2 presents the locations of archeologically sensitive areas. As previously stated, the significance levels of much of the identified archaeological resources located throughout the Planning Area have not been evaluated and should be considered potentially significant. Development under the project could result in a loss of known and currently unknown archeological and Tribal cultural resources. While a mitigation framework is proposed, at a program level of analysis it is not possible to ensure that every impact could be fully mitigated. Therefore, the potential loss of cultural and tribal cultural resources, both directly and indirectly, within the Concept Areas and throughout the Planning Area, would be considered significant and unavoidable.

The changes to the land use plan associated with the Reduced Growth Alternative would not avoid any overlap with known historic resources, and would slightly reduce the overlap of the Downtown Center with the Moreno Hills Complex archeologically sensitive area. Additionally, development within the reduced Concept Areas and other areas subject to current land use designations established under the existing 2006 General Plan would have the potential to impact unknown historical archaeological, and tribal cultural resources, which would be considered a significant impact. Like the project, without specific development plans, there is no certainty that the implementation of mitigation measures would reduce the impact to a level less than significant. Therefore, impacts to cultural and tribal cultural resources under the Reduced Growth Alternative would remain significant and unavoidable, and would be less than the project.

6.4.2.5 Noise

Under the project, the addition of proposed land use changes within the Concept Areas and residential density changes throughout the Planning Area would result in significant noise impacts due to increased ambient noise levels, noise/land use compatibility, and construction/vibration noise. While future development would be required to adhere to proposed 2021 GPU policies and implement mitigation measures, ambient noise and construction-related noise impacts would remain significant and unavoidable.

The Reduced Growth Alternative would reduce employment development opportunities within the Downtown Center, Corridor Mixed Use and Highway Office/Commercial Concept Areas, which currently experience noise levels greater than 65 CNEL. The portions of the Downtown Center and Highway Office/Commercial that would not receive the new designation could still be developed under their current land use designations established under the existing 2006 General Plan, and the Community Corridors would be developed with slightly less density. Construction related noise impacts under this alternative would be similar compared to the project. Additionally, new residential uses could result in noise/land use compatibility impacts similar to the project. However, the reduced growth

under this alternative would result in a reduction of VMT compared to the project. Therefore, impacts related to noise under the Reduced Growth Alternative would be significant and unavoidable, and would be less compared to the project.

6.4.2.6 Transportation

The Reduced Growth Alternative would reduce the amount of non-residential development within the proposed Community Corridors by approximately 10 to 15 percent compared to the project, and some portions of the Downtown Center and Highway Office/Commercial Concept Areas would retain their current land use designations. This would reduce VMT compared to the project. All other impacts would be similar to the project. Therefore, impacts related to transportation under the Reduced Growth Alternative would remain significant and unavoidable, and would be less compared to the project.

6.4.2.7 Issues Found Less than Significant in the EIR

As detailed in Section 6.2 above, impacts associated with a number of environmental topics were found to be less than significant in this EIR. While implementation of the Reduced Growth Alternative would shift land uses in certain areas of the city, it would still implement new 2021 GPU goals and policies, the Housing Element Update, and the CAP. All environmental topics found to be less than significant for the project in this EIR area are also anticipated to result in less than significant impacts under the Reduced Growth Alternative.

6.4.3 Conclusions

As shown in Table 6-1, the Reduced Growth Alternative would result in the same significant and unavoidable impacts associated with agricultural resources, air quality, biological resources, cultural and tribal cultural resources, noise, and transportation. Reduced growth and VMT would incrementally reduce air quality emissions compared to the project. Reduction of the footprints of the Downtown Center and Highway Office/Commercial would incrementally reduce impacts related to agricultural resources, biological resources, and cultural and tribal cultural resources compared to the project. Impacts related to noise and transportation would be less compared to the project due to the reduction in VMT.

The Reduced Growth Alternative would not meet as many primary project objectives compared to the project. The elimination of employment opportunities would not accommodate job growth, build a diverse economy, improved rate of economic growth, or focus commercial uses in corridors to the same degree as the project.

6.5 Redistributed Growth Alternative

6.5.1 Description

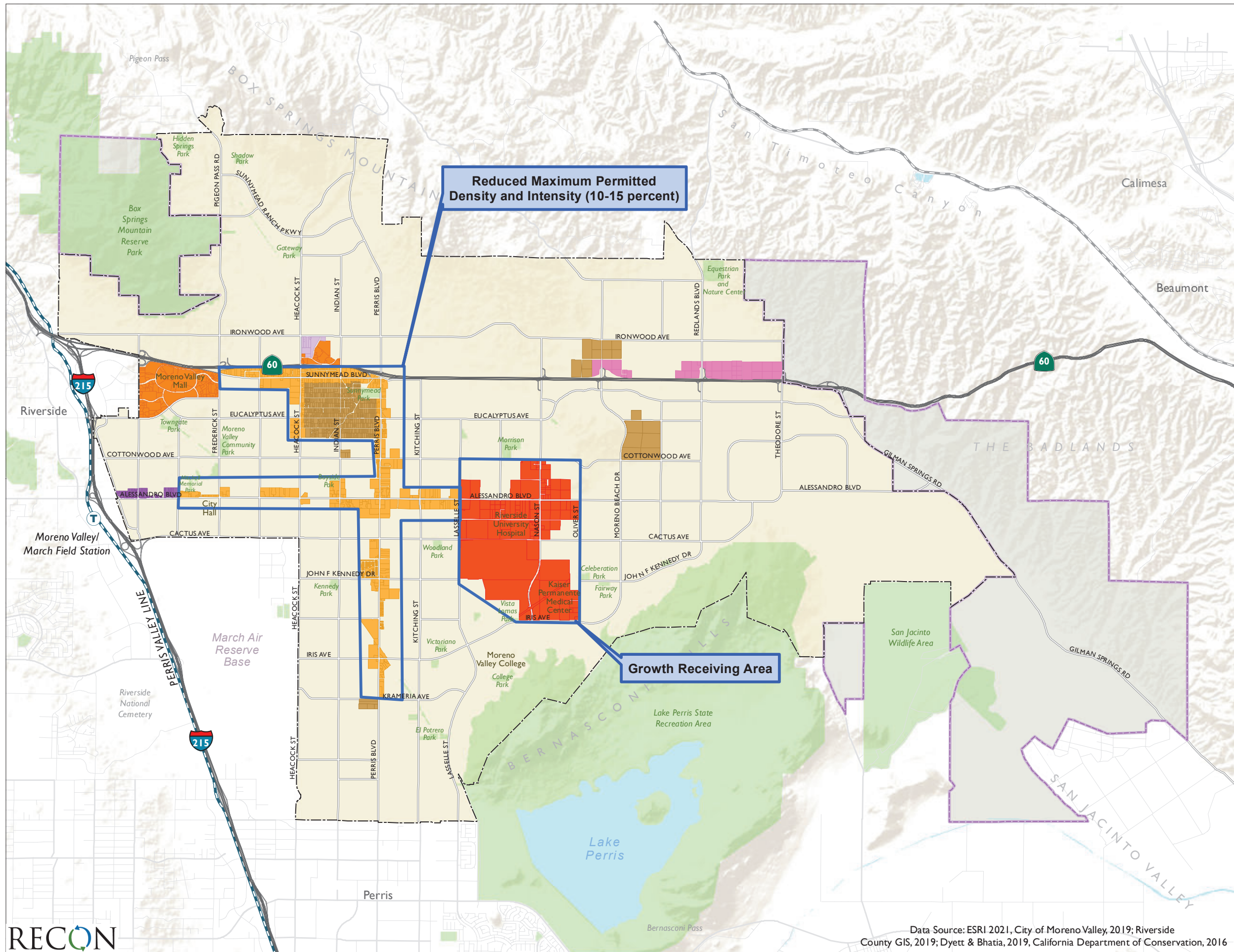
The Redistributed Growth Alternative would result in the same level of growth as the proposed plan, but would redistribute growth from the proposed Community Corridor Concept Areas to the Downtown Center Concept Area (Figure 6-2). This alternative would reduce the maximum permitted density and intensity in the Community Corridor Concept Areas, thereby reducing future development proposed along Sunnymead Boulevard, Alessandro Boulevard, Perris Boulevard, and Heacock Street by approximately 10 to 15 percent compared to the project. The reduced growth capacity from these areas would be redistributed to the Downtown Center Concept Area. This alternative would also remove a portion of the proposed Highway Office/Commercial Concept Area located north of SR-60 and the existing office and residential land use designations from the existing 2006 General Plan would be retained. Redistribution of land uses associated with this alternative would not alter the total amount of residential, commercial, and office land uses compared to the project.

6.5.2 Analysis

6.5.2.1 Agricultural Resources

Under the project, agriculturally designated land within the Concept Areas would be converted to urban uses. These conversions would consist primarily of land designated as Farmland of Local Importance within the Downtown Center and Highway Office/Commercial Concept Area, as well as approximately 15 acres of Prime Farmland within the Highway Office/Commercial Concept Area. The loss of Prime Farmland within the Highway Office/Commercial Concept Area, as well as indirect loss throughout the Planning Area, would be considered significant and unavoidable.

The transfer of density from the Community Corridors to the Downtown Center would not affect impacts related to agricultural resources because the Downtown Center is already identified for development. The Reduced Growth Alternative would remove a portion of the Highway Office/Commercial Concept Area that is located on soils designated as Prime Farmland. However, this area, and others that are located on soils designated as Prime Farmland, could still be developed under their current land use designations established under the existing 2006 General Plan. While development would be less intense and could result in incrementally less conversion of existing Prime Farmland, the loss of agriculturally designated lands would be considered significant. There would be no feasible mitigation that would reduce the impact to a less than significant level. Therefore, impacts to agricultural resources under the Redistributed Growth Alternative would remain significant and unavoidable, and would be less than the project.



- City of Moreno Valley
- Sphere of Influence
- General Plan Concept Areas**
- Mixed Use**
- Downtown Center
- Center Mixed Use
- Corridor Mixed Use
- Commercial/Office/Industrial**
- Highway Office/Commercial
- Business Park/Light Industrial
- Business Flex
- Residential**
- Residential Density Changes



FIGURE 6-2
Redistributed Growth Alternative

6.5.2.2 Air Quality

The project would not exceed the assumptions used to develop the AQMP, and the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. The project would not expose sensitive receptors to substantial pollutant concentrations, and would not result in emissions (such as those leading to odors) adversely affecting a substantial number of people. The scale and extent of construction activities associated with buildout of the Planning Area could exceed the relevant SCAQMD thresholds for some projects, and impacts associated with criteria pollutants during construction were determined to be significant and unavoidable.

The Redistributed Growth Alternative would reduce permitted density and intensity within the proposed Community Corridors by approximately 10 to 15 percent, and transfer this development to the Downtown Center. This would further improve the Downtown Center as a mixed-use activity centers that is pedestrian-friendly community center linked to the regional transit system, which in turn would reduce VMT compared to the project. This in turn would reduce air quality emissions, ensuring that this alternative would not exceed the assumptions used to develop the AQMP, and would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timeline attainment of air quality standards. Similarly, the reduced emissions compared to the project would further avoid exposure of sensitive receptors to substantial pollutant concentrations, and further avoid potential impacts associated with odors. However, the scale and extent of construction activities associated with buildout under this alternative could exceed the relevant SCAQMD thresholds for some projects, and impacts associated with criteria pollutants during construction. Therefore, impacts related to air quality under the Redistributed Growth Alternative would remain significant and unavoidable, and would be less compared to the project.

6.5.2.3 Biological Resources

Vegetation communities located within the Corridor Mixed Use and Highway Office/Commercial Concept Areas include developed/ disturbed and grassland (Highway Office/Commercial Concept Area). Development under the project would result in a loss of these habitats, as well as small swaths of Coastal sage scrub and riparian habitat within and adjacent to the Downtown Center Concept Area. While a mitigation framework is proposed, at a program level of analysis it is not possible to ensure that every impact could be fully mitigated. Therefore, the loss of sensitive habitat, both directly and indirectly, within the Concept Areas and throughout the Planning Area, would be considered significant and unavoidable.

The transfer of density from the Community Corridors to the Downtown Center would not affect impacts related to agricultural resources because the Downtown Center is already identified for development. The Reduced Growth Alternative would remove a portion of the Highway Office/Commercial Concept Area that has the potential to support sensitive species. However, this area could still be developed under their current land use designations

established under the existing 2006 General Plan. While development would be less intense and could result in an incrementally reduced impact to biological resources, impacts to sensitive species would be considered significant. Like the project, without specific development plans, there is no certainty that the implementation of mitigation measures would reduce the impact to a less than significant level. Therefore, impacts to biological resources, under the Redistributed Growth Alternative would remain significant and unavoidable, and would be less than the project.

6.5.2.4 Cultural and Tribal Cultural Resources

Figure 4.5-1 presents the locations of known historic resources within the Planning Area, while Figure 4.5-2 presents the locations of archeologically sensitive areas. Development under the project could result in a loss of known and currently unknown archeological and tribal cultural resources which is considered a significant impact. While a mitigation framework is proposed, at a program level of analysis it is not possible to ensure that every impact could be fully mitigated. Therefore, the potential loss of cultural and tribal cultural resources, both directly and indirectly, within the Concept Areas and throughout the Planning Area, would be significant and unavoidable.

The changes to the land use plan associated with the Redistributed Growth Alternative would not avoid any overlap with known historic resources or archaeologically sensitive areas. Additionally, development within the reduced Concept Areas and other areas subject to current land use designations established under the existing 2006 General Plan would have the potential to impact unknown historical, archaeological, and tribal cultural resources, which would be considered a significant impact. Like the project, without specific development plans, there is no certainty that the implementation of mitigation measures would reduce the impact to a level less than significant. Therefore, impacts to cultural and tribal cultural resources under the Redistributed Growth Alternative would remain significant and unavoidable, and would be similar to the project.

6.5.2.5 Noise

Under the project, the addition of proposed land use changes within the Concept Areas and residential density changes throughout the Planning Area would result in significant noise impacts due to increased ambient noise levels, noise/land use compatibility, and construction/vibration noise. While future development would be required to adhere to proposed 2021 GPU policies and implement mitigation measures, ambient noise and construction-related noise impacts would remain significant and unavoidable.

The Redistributed Growth Alternative would reduce permitted density and intensity within the proposed Community Corridors by approximately 10 to 15 percent, and transfer this development to the Downtown Center and transfer this growth to the Downtown Center Concept Area. This would in turn reduce VMT compared to the project, which could reduce ambient noise. All other impacts would be similar to the project. Therefore, impacts related to noise under the Redistributed Growth Alternative would remain significant and unavoidable, and would be less compared to the project.

6.5.2.6 Transportation

The Redistributed Growth Alternative would reduce permitted density and intensity within the proposed Community Corridors by approximately 10 to 15 percent, and transfer this development to the Downtown Center. This would further improve the Downtown Center as a mixed-use activity center that is pedestrian-friendly community center linked to the regional transit system, which in turn would reduce VMT compared to the project. All other impacts would be similar to the project. Therefore, impacts related to transportation under the Redistributed Growth Alternative would remain significant and unavoidable, and would be less compared to the project.

6.5.2.7 Issues Found Less than Significant in the EIR

As detailed in Section 6.2 above, impacts associated with a number of environmental topics were found to be less than significant for the project in this EIR. While implementation of the Redistributed Growth Alternative would shift land uses in certain areas of the city, it would still implement new 2021 GPU goals and policies, the Housing Element Update, and the CAP. All environmental topics found to be less than significant for the project in this EIR are also anticipated to result in less than significant impacts under the Redistributed Growth Alternative.

6.5.4 Conclusions

As shown in Table 6-1, the Redistributed Growth Alternative would result in the same significant and unavoidable impacts associated with air quality, agricultural resources, biological resources, cultural and tribal cultural resources, noise, and transportation. Reduction of the Highway Office/Commercial footprint would incrementally reduce impacts related to agricultural resources and biological resources compared to the project. Impacts related to cultural and tribal cultural resources would be the same because changes to the land use plan associated with the Redistributed Growth Alternative would not avoid any overlap with known historic resources or archaeologically sensitive areas. Impacts related to air quality, noise, and transportation would be less compared to the project due to the reduction in VMT.

The Redistributed Growth Alternative would meet most of the primary project objectives developed for the project. The redistribution of employment opportunities does not meet the objectives of creating high development corridors to the same degree as the project. Additionally, land within the Downtown Center is not housing ready, and would not be able to accommodate as many housing units needed to achieve RHNA targets within the eight-year Housing Element planning horizon. However, it would still provide all the economic benefits anticipated from the project, as well as meet the other objectives.

6.6 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify the environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives. The project itself may not be identified as the environmentally superior alternative.

The Redistributed Growth Alternative is the environmentally superior alternative because it would incrementally reduce significant impacts associated with air quality, agricultural resources, biological resources, noise, and transportation. Although impacts related to cultural and tribal cultural resources would remain the same as this project, this alternative would reduce most significant impacts, but not to below a level of significance, while still meeting most objectives of the project. However, land within the Downtown Center is not housing ready, and would take more time and investment to accommodate housing units needed to achieve RHNA targets compared to what could be achieved along the Community Corridors proposed under the project. Therefore, the Redistributed Growth Alternative is not recommended for adoption, since it would not likely achieve the same level of housing needed to satisfy the RHNA requirements of the project within the timeframe required.