CITY OF MORENO VALLEY

MITIGATED NEGATIVE DECLARATION FOR THE COTTONWOOD & EDGEMONT PROJECT

Master Plot Plan (PEN21-0325)
Plot Plan (PEN21-0326)
Tentative Parcel Map No. 38325 (PEN21-0327)

February 2023

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

Prepared By
T&B PLANNING, INC.
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Project Description:
The Cottonwood & Edgemont Project comprises a proposal for a Master Plot Plan (PEN21-0325), Plot Plan (PEN21-0326), and Tentative Parcel Map No. 38325 (PEN21-0327) to allow for the development of two (2) light industrial buildings with a total combined building floor area of 99,630 square feet (s.f.) on an approximately 7.94-gross-acre property (6.88 net acres). The Project would include cargo loading areas at each building (within an enclosed truck court with loading docks on the eastern sides of the proposed buildings), parking areas, landscaping, signage, and lighting.

Project Location:
The Project Site is located on the east side of Old 215 Frontage Road, approximately 500 feet south of Cottonwood Avenue in the City of Moreno Valley, Riverside County, California (Assessor Parcel Numbers [APNs]: 263-190-012, -014, -015, -016, -017, -018, -019, -036)

Project Proponent:
CDRE Holdings 21 LLC
523 Main Street
El Segundo, CA 90245

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

Mitigation Measures:

No.	Mitigation Measure
MM BR-1	As a condition of approval for all grading permits, vegetation clearing and ground disturbance shall be prohibited during the migratory bird nesting season (February 1 through September 15), unless a migratory bird nesting survey is completed in accordance with the following requirements: a. A migratory nesting bird survey of the project's impact footprint shall be conducted by a qualified biologist within (3) days prior to initiating vegetation clearing or ground disturbance. b. A copy of the migratory nesting bird survey results report shall be provided to the City of Moreno Valley Planning Division. If the survey identifies the presence of active nests, then the qualified biologist shall provide the City of Moreno Valley Planning Division with a copy of maps showing the location of all nests and an appropriate buffer zone around each nest sufficient to protect the nest from direct and indirect impact. The size and location of all buffer zones, if required, shall be subject to review and approval by the City of Moreno Valley Planning Division and shall be no less than a 300-foot radius around the nest for non-raptors and a 500-foot radius around the nest for raptors. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist and City Planning Division verify that the nests are no longer occupied and the juvenile birds can survive independently from the nests.
MM CR-1	Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all ground disturbing activities. The Project

No.	Mitigation Measure
	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 contractor and the City, shall develop a CRMP as defined in Mitigation Measure CR-3. The Project Archaeologist shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The archaeological monitor shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological resources are unearthed.
MM CR-3	The Project Archaeologist, in consultation with the contractor, and the City, shall develop a CRMP in consultation pursuant to the definition in AB52 to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting Tribe is defined as a Tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB52 consultation process, and has completed AB 52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include: a) Project description and location; b) Project grading and development scheduling; c) Roles and responsibilities of individuals on the Project; d) The pre-grading meeting and Cultural Resources Worker Sensitivity Training details; e) The protocols and stipulations that the contractor, City, Consulting Tribe (s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation; f) The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items; and g) Contact information of relevant individuals for the Project.
MM CR-4	In the event that Native American cultural resources are discovered during the course of ground disturbing activities (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries: a) One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Moreno Valley Planning Department: i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place they were found with no development affecting the integrity of the resources. ii. 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 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 Mitigation Measure CR-3 The location for the future reburial area shall be identified on a confidential exhibit on file with the City, and concurred to by the Consulting Native American Tribal Governments prior to certification of the environmental document.
MM CR-5	The City shall verify that the following note is included on the Grading Plan: “If any suspected archaeological resources are discovered during ground –disturbing activities and the Project Archaeologist or Native American Tribal Representatives are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Tribal Representatives to the site to assess the significance of the find."
MM CR-6	If potential historic or cultural resources are uncovered during excavation or construction activities at the project site that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, all ground disturbing

No.	Mitigation Measure
	activities in the affected area within 100 feet of the uncovered resource must cease immediately and a qualified person meeting the Secretary of the Interior's standards (36 CFR 61), Tribal 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. Further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional archeologist and Tribal Monitors, if needed. 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-3 before any further work commences in the affected area. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.
MM CR-7	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).
MM CR-8	It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 6254 (r)., parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).
MM CR-9	Prior to final inspection, the developer/permit holder shall prompt the Project Archeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside (UCR) and one (1) copy shall be submitted to the Consulting Tribe(s) Cultural Resources Department(s).
MM GEO-1	Prior to the issuance of a grading permit, the Project Applicant shall provide evidence to the City of Moreno Valley that a qualified paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.
MM GEO-2	The paleontological monitor shall conduct full-time monitoring during mass grading, trenching, and excavation operations in undisturbed, very old alluvial fan sediments that occur at depths between 1-5 feet below the existing ground surface on the Project Site. The paleontological monitor shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontological monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified paleontological personnel to have a low potential to contain or yield fossil resources.

No.	Mitigation Measure
MM GEO-3	Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the Western Science Museum in Hemet, California, is required for significant discoveries.
MM GEO-4	A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Moreno Valley prior to building final.

Attachments:

1. Initial Study
2. Mitigation Monitoring and Reporting Program

INITIAL STUDY (IS) FOR COTTONWOOD & EDGEMONT PROJECT

BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. **Project Case Number(s):** Master Plot Plan (PEN21-0325), Plot Plan (PEN21-0326), and Tentative Parcel Map (PEN21-0327)

2. **Project Title:** Cottonwood & Edgemont

3. **Public Comment Period:** February 9, 2023, to March 1, 2023

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

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

6. **Prepared By:** T&B Planning, Inc.
   3200 El Camino Real, Suite 100
   Irvine, CA, 92602
   Contact: David Ornelas

7. **Project Sponsor:**

Applicant/Developer	**Property Owner**
CDRE Holdings 21 LLC	CDRE Holdings 21 LLC
523 Main Street	523 Main Street
El Segundo, CA 90245	El Segundo, CA 90245

8. **Project Location:** The 7.94-gross-acre Project Site is located in the City of Moreno Valley, Riverside County, California. The Project Site is located on the east side of Old 215 Frontage Road, approximately 500 feet south of Cottonwood Avenue and approximately 620 feet north of Bay Avenue. Refer to Figure 1, *Regional Map*, Figure 2, *Vicinity Map*, and Figure 3, *USGS Topographic Map*. The Project Site is comprised of the following eight (8) Assessor Parcel Numbers (APNs): 263-190-012, -014, -015, -016, -017, -018, -019, -036.

9. **General Plan Designation:** Business Park (BP), which provides areas for manufacturing, research and development, warehousing, and distribution, as well as office and support commercial activities. Refer to Figure 4, *Existing General Plan Land Use Designation*.

10. **Specific Plan Name and Designation:** Not Applicable.

11. Existing Zoning: Business Park (BP), which provides for light industrial, research and development, office-based firms, and limited supportive commercial uses. Refer to Figure 5, *Existing Zoning*.

12. Surrounding Land Uses and Setting: See below. Also, refer to Figure 6, *Aerial Photograph* and Figure 7 through Figure 9, *Site Photographs*.

	Land Use	General Plan	Zoning
Project Site	**Undeveloped**	**BP**	**BP**
North	Undeveloped, Drainage Channel, Residential	BP Residential 3 (R3) Commercial	BP Residential 3 (R3) Community Commercial (CC)
South	Vacant, Residential	BP	BP
East	Residential, Church	BP	BP
West[1]	Warehouse Distribution, Business/Office Park	Business/Office Park (B/OP)	Business and Manufacturing (BMP)

1. Properties located west of Old 215 Frontage Road are within the City of Riverside

13. Description of the Site and Project:

Environmental Setting

The 7.94-gross-acre Project Site is vacant and contains end-dumped stockpiles of artificial fill soils adjacent to Edgemont Street, Old 215 Frontage Road, and in the central portion of the Project Site. Ornamental landscaping and concrete debris – likely the remnants of former slab foundations – are intermixed with the end dumped piles. The remaining portions of the Project Site consist of sparse weeds and disced soil.

The Project Site is relatively flat, with site elevations ranging from a highpoint of approximately 1,540 feet above mean sea level (amsl) at the southeast corner of the Site to a low point of approximately 1,526 feet amsl in the north portion of the Site. The Project Site generally drains from the south to the north, toward the Edgemont Channel located adjacent to the Site. (CASC, 2021a, p. 1)

The Project Site is underlain by fill material and older alluvial materials. The fill material occurs at depths between 1 and 5 feet and is associated with past development and weed abatement practices at the Site. The fill materials are comprised of silty sand, asphalt grindings, concrete debris, and plastic. The older alluvial material occurs at depths below 5 feet and consists of silty sand with a minor unit of well graded sand with silt. (LOR, 2021, p. 5)

Project Description

The Project provides for the development of the Project Site with two 49,815 sq. ft. light industrial buildings (total of 99,630 s.f.) and related improvements, including paved access and drive aisles, parking, landscaping, lighting, signage, stormwater drainage improvements, and utility connections. The proposed buildings would each include 4,000 s.f. of office space and 9 dock doors; the dock doors are provided on the east side of each building. The site plan for the Project is illustrated in Figure 10, *Project Site Plan*. The individual site plans for Buildings 1 and 2 are illustrated in Figure 11, *Site Plan – Building 1*, and Figure 12, *Site Plan – Building 2*, respectively. Proposed Master Plot Plan (PEN21-0325) and Plot Plan (PEN21-0326) provide the specific development plans for the two proposed buildings, as described on the following pages.

The Project also includes a Tentative Parcel Map (PEN21-0327) to merge the eight (8) existing APNs within the Project Site and create two (2) parcels. Building 1 would be constructed on proposed Parcel 1, which would encompass 3.71 net acres. Building 2

would be constructed on proposed Parcel 2, which would encompass 3.36 acres. The proposed Tentative Parcel Map also would vacate public right-of-way for Old 215 Frontage Road that is no longer needed by the City of Moreno Valley. The vacated public right-of-way segment would be approximately 17 feet wide and would run the entire length of the Project Site's frontage with Old 215 Frontage Road.

Circulation

Vehicular access to the Project would be provided by three (3) proposed driveways along Old 215 Frontage Road. The middle driveway would be accessible to only passenger vehicles and the northernmost and southernmost driveways would be accessible to both passenger vehicles and heavy trucks. All driveways would be restricted to right turn movements when entering/existing the Project Site. Sight distance at each Project driveway would be reviewed by the City at the time of preparation of final grading, landscape, and street improvement plans to ensure that standard California Department of Transportation (Caltrans) and City sight distances are met.

Parking and Loading

The Project provides a total of 104 parking stalls and a total of 26 truck trailer parking stalls. Each building would provide 38 standard parking stalls, one (1) electric vehicle (EV) van parking stall, two (2) Clean Air/Van Pool/EV, 7 future EV parking, one (1) accessible van parking stall, and three (3) standard accessible parking stalls. The auto parking stalls for Building 1 would be provided along the western and southern sides of Building 1 and the auto parking stalls for Building 2 would be provided along the western and northern sides of Building 2. The Project would exceed the City's parking requirements (96 auto parking stalls are required by the City's Planning and Zoning Code). Additionally, Building 1 would provide 17 truck trailer parking stalls and Building 2 would provide 9 truck trailer parking stalls. Bicycle parking spaces (racks) would be provided in conformance with the City's Municipal Code Section 9.11.060(B)(1), which requires bicycle parking spaces be provided at a rate equate to five (5) percent of the total parking spaces. Proposed bicycle parking would be provided adjacent to the office spaces of the proposed buildings, at the southwest corner of Building 1 (1 rack) and northwest corner of Building 2 (1 rack).

Architecture

The Project's architectural design for each proposed building is provided in Figure 14, *Conceptual Architectural Elevations – Building 1* and Figure 15, *Conceptual Architectural Elevations – Building 2*. Each building would have a maximum height of approximately 41 feet (measured from finished floor to the top of the parapets). Both buildings are proposed to be constructed with painted concrete tilt-up panels and low reflective, blue-glazed glass. Articulated building elements, including parapets with a varied roofline, wall recesses, awnings, and mullions are proposed as decorative elements. The exterior color palette for Buildings 1 and 2 are comprised of various neutral, earth-toned colors, including shades of white, beige, gray and dark brown with wood-like tile accents (see Figure 16, *Conceptual Material Board*, Figure 17, *Conceptual Colored Elevations – Building 1*, and Figure 18, *Conceptual Colored Elevations – Building 2*).

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

Landscaping

Figure 19, *Conceptual Landscape Plan*, depicts the proposed landscape design for the Project. Proposed landscaping would be ornamental in nature and would feature trees,

shrubs, and drought-tolerant accent plants in addition to a variety of groundcovers. Trees and groundcover would be concentrated along the Project Site's frontage with Old 215 Frontage Road and Edgemont Street and along the Project Site's northern and southern boundaries. Landscaping also is massed at driveways, around the buildings, and in and around automobile parking areas.

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

Project Improvements

Public Roadway Improvements

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

1. The Project Applicant would improve the Old 215 Frontage Road segment that abuts the Project Site to its ultimate full section as a Divided Arterial as follows:
    a. Construction of a 14-foot-wide vehicle travel lane on the west side of the street;
    b. Construction of an 18-foot-wide raised center median;
    c. Construction of a 34-foot-wide travel way (including shoulder) on the east side of the street;
    d. Construction of curb and gutter on the east side of the street; and
    e. Construction of a 12-foot-wide parkway that features a curb-adjacent sidewalk and a bioretention swale (the bioretention swale would straddle the property line and be partially located on the Project Site).

2. The Project Applicant would improve the western side of Edgemont Street along the Project Site's frontage to its ultimate half-section width as a Local Street as follows:
    a. Construction of an 18-foot-wide travel way on the west side of the street;
    b. Construction of curb and gutter; and
    c. Construction of a 12-foot-wide parkway that features a curb-adjacent sidewalk and a bioretention swale.

Water Infrastructure

Box Springs Mutual Water Company (BSMWC) would provide water service to the Project Site. As depicted on Figure 20, *Conceptual Utility Plan*, the Project would connect to a water line beneath Old 215 Frontage Road; numerous connection points are proposed for indoor, outdoor (i.e., landscape irrigation), and fire protection (i.e., fire suppression system, fire hydrant) services. Under existing conditions, the water line segment beneath Old 215 Frontage Road is sized at a 4-inch-diameter; however, the segment abutting the Project Site would be increased to a 12-inch-diameter as part of the Project (approximately 900 linear feet [LF]). All proposed water facilities would be designed and constructed in accordance with BSMWC standards.

The Project would include off-site improvements to the existing 8-inch waterline beneath Cottonwood Avenue; approximately 730 LF of the 8-inch waterline would be upsized to 12 inches.

Sanitary Sewer Service

Edgemont Community Services District (ECSD) would provide wastewater conveyance services to the Project Site. As shown on Figure 20, the Project would connect to an existing 15-inch diameter sewer line beneath Old 215 Frontage Road. All proposed wastewater facilities would be designed and constructed in accordance with ECSD standards.

Stormwater Drainage Infrastructure

The Project's stormwater drainage system would capture, treat, and convey flows generated on the Project Site, as well as flows generated within Old 215 Frontage Road and Edgemont Street. The components of the proposed stormwater drainage system are illustrated on Figure 20.

The stormwater drainage system on the Project Site would use a system of ribbon gutters to direct all stormwater flows generated on the Site to an underground detention basin on the east portion of the Project Site (within the truck court for Building 2). The proposed underground basin will direct flows to a proposed sump and pump which would convey flows to a modular wetland system for water quality treatment. After moving through the modular wetland system, treated stormwater runoff flows would discharge to an underground storm drain that would convey flows westerly across the Project Site and northerly off-site to a proposed new connection with the Edgemont Channel. The Project also entails the construction of a new outlet within the Edgemont Channel to receive Project flows. In instances where the underground detention basin reaches capacity, excess flows would bypass the modular wetland system and be routed directly to the Edgemont Channel. The Edgemont Channel is an existing concrete-lined storm drain channel that receives all runoff (as surface sheet flow) from the Project Site under existing conditions.

The Project also provides for the construction of a new public storm drain within the Old 215 Frontage Road segment that abuts the Project Site. The new storm drain is intended to convey storm water runoff generated within Old 215 Frontage Road. A drop inlet would be installed at the southern end of the proposed raised median within Old 215 Frontage Road; this would capture flows carried by the existing center median. The drop inlet would connect to a storm drain pipe that would travel north where it would connect to a new catch basin on the east side of Old 215 Frontage Road (adjacent to the northwest corner of the Project Site) to capture storm water runoff generated on the east side of the street. On the east side of the street, the Project provides for the construction of a bioswale, which would provide water quality treatment for street runoff as flows are conveyed northerly to the aforementioned catch basin. From the new catch basin, all runoff flows would be conveyed easterly and northerly by a new underground storm drain and would discharge to the Edgemont Channel. The Edgemont Channel receives all runoff (as surface sheet flow) from Old 215 under existing conditions.

Lastly, the Project provides for the construction of a new bioswale within the Edgemont Street segment that abuts the Project Site. The bioswale would be located on the west side of the street and provides water quality treatment for collected stormwater flows. The bioswale would connect to the new storm drain that is proposed on the Project Site, which would convey flows across the Site to the Edgemont Channel.

Dry Utilities

Implementation of the Project would result in the installation of conduit for communications cabling along the Project Site's frontage with Old 215 Frontage Road. Additionally, existing wooden power poles along the Project Site's frontage with Old 215 Frontage Road would be removed as part of Project construction and the overhead electric transmission lines suspended on these poles would be undergrounded. The removal of the power poles and

the undergrounding of the transmission lines would be performed in coordination with Moreno Valley Utility.

Construction Characteristics

Earthwork and Grading

Construction activities would occur over the entire Project Site. Construction activities also would occur off-site, within the public rights-of-way for Old 215 Frontage Road and Edgemont Street. The area that would be disturbed by Project construction is illustrated on Figure 21, *Project Physical Impact Footprint.*

The proposed grading plan for the Project Site is illustrated on Figure 22, *Conceptual Grading Plan*. The Project would result in approximately 16,500 cubic yards of cut and 12,400 cubic yards of fill. Based on the expected shrinkage and compaction of on-site soils, earthwork activities are expected to balance, and no import or export of soil materials would be required. Retaining walls are proposed along segments of the northern and southern boundaries of the Project Site.

Construction Activities

Based on the information provided by the Project Applicant, the Project is anticipated to be constructed over a period of approximately 193 workdays (8 months). Site preparation would occur first, followed by mass-grading and installation of underground infrastructure. Next, fine grading would occur, surface materials would be poured, and the proposed buildings would be erected, connected to the underground utility system, and painted. Lastly, landscaping, fencing, screen walls, lighting, signage, and other site improvements would be installed. For purposes of analysis in this IS/MND, construction is assumed to commence in February 2023 and finish in October 2023. The estimated Project construction schedule, organized by general construction stage, is summarized in Table 1, *Estimated Construction Schedule*.

Table 1 Estimated Construction Schedule

Construction Activity	Start Date	End Date	Days
Site Preparation	02/01/2023	02/28/2023	20
Grading	03/01/2023	03/31/2023	23
Building Construction	04/01/2023	09/29/2023	130
Paving	10/02/2023	10/13/2023	10
Architectural Coating	10/14/2023	10/27/2023	10

Source: (Urban Crossroads, 2022c, Table 3-1)

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

The makeup of the construction equipment fleet that is expected to be used for the Project, and which is utilized for purposes of analysis in this IS/MND, is summarized in Table 2, *Estimated Construction Equipment Fleet*.

Table 2 Estimated Construction Equipment Fleet

Construction Activity	Equipment	Amount	Hours Per Day
Site Preparation	Skip Loaders	1	8
	Tractors/Loaders/Backhoes	1	8
Grading	Blade	1	8
	Rubber Tired Dozers	1	8
	Scrapers	4	8
	Tractors/Loaders/Backhoes	1	8
Building Construction	Crane	1	8
	Forklifts	3	8
	Tractors/Loaders/Backhoes	2	8
	Welders	1	8
Paving	Blade	1	8
	Paving Equipment	1	8
	Rollers	2	8
	Skip Loaders	1	8
Architectural Coating	Air Compressors	1	8

Source: (Urban Crossroads, 2022c, Table 3-2)

Operational Characteristics

At the time IS/MND was prepared, the future occupant(s) of the Project is unknown. The Project Applicant expects that the proposed buildings would be utilized for warehousing/distribution land uses. The proposed buildings are designed with the potential to utilize up to 10 percent of their floor area for cold storage or refrigerated uses. The Project is expected to be operational 24 hours per day, seven days per week, with exterior loading and parking areas illuminated at night. Lighting would be subject to compliance with Moreno Valley Municipal Code Section 9.08.100, which states that all outdoor lighting associated with nonresidential uses shall be fully shielded and directed away from surrounding residential uses to reduce glare and light trespass and shall not exceed one-quarter foot-candle minimum maintained lighting measured from within five (5) feet of any property line.

The proposed warehouse buildings are designed such that business operations would be conducted within the enclosed building, except for traffic movement, parking, and the loading and unloading of tractor trailers at designated loading bays. As a practical matter, dock doors on industrial buildings are not occupied by a truck at all times of the day. There are typically more dock door positions on industrial buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies. In other words, trucks ideally dock in the position closest to where the goods to be carried by the truck are inside the building. As a result, many dock door positions are frequently inactive throughout the day. The Project is expected to use outdoor cargo handling equipment (e.g., yard trucks, hostlers, yard goats,

pallet jacks, forklifts) that is only powered by non-diesel engines (e.g., gasoline, natural gas, electric).

During operation, employees, visitors, and vehicles hauling goods will travel to and from the Project Site daily. Pursuant to State law, on-road diesel-fueled trucks that would service the Project are required to comply with various air quality and greenhouse gas emission standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions. Compliance with State law is mandatory and inspections of on-road diesel trucks subject to applicable State laws are conducted by the California Air Resources Board (CARB).

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

The City of Moreno Valley is required to consult with interested California Native American tribes regarding the Project pursuant to Assembly Bill 52 (AB 52). The City contacted California Native American tribes with traditional use areas that encompass or are in the vicinity of the Project Site. The Project did not received requests for consultation from Native American tribes.

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

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

16. Other Technical Studies Referenced in this Initial Study (Incorporated into this Initial Study by Reference and Provided as Appendices to this Initial Study):

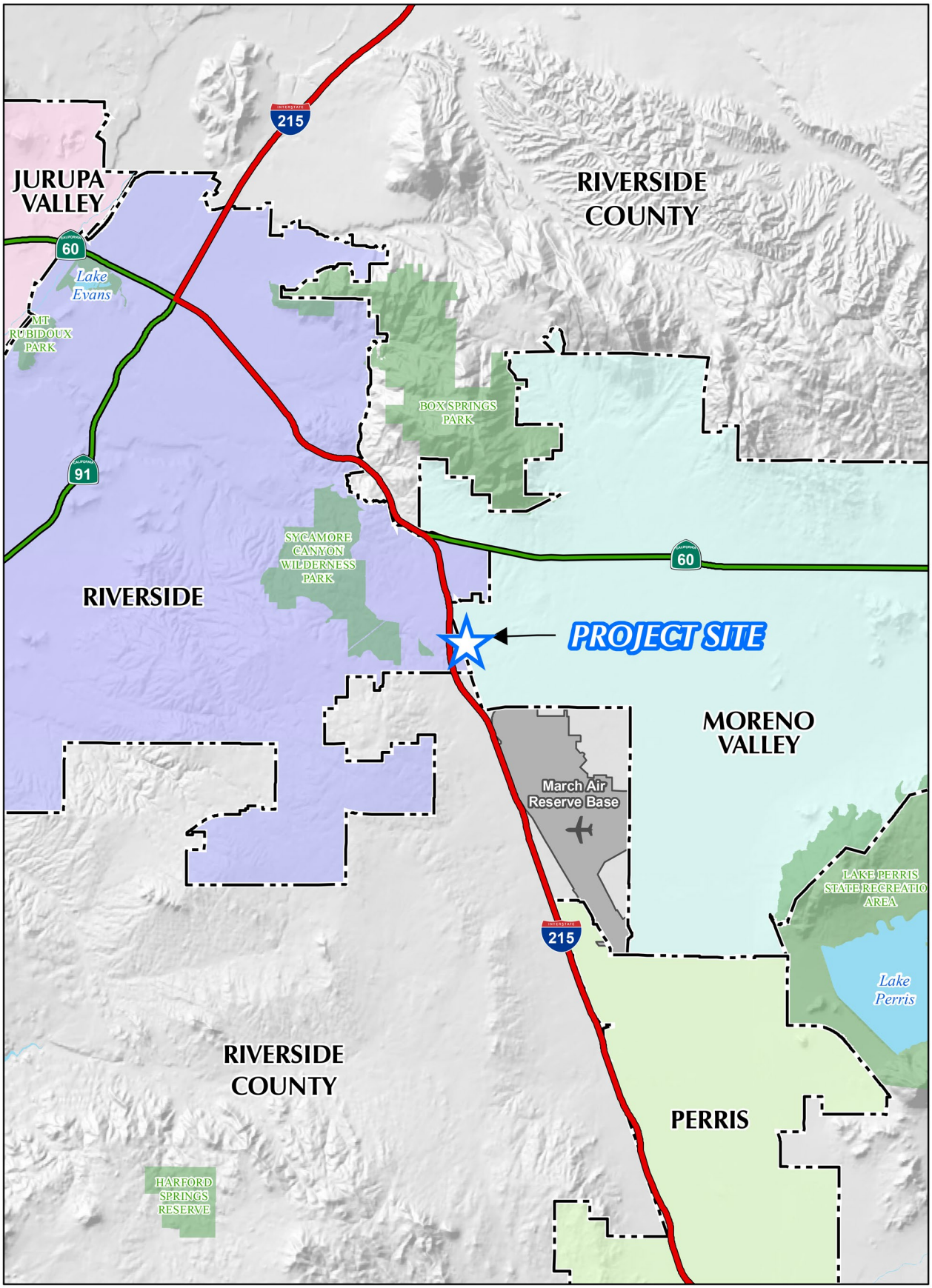
Technical Appendix A1:	*Cottonwood & Edgemont Warehouse Air Quality Impact Analysis*
Technical Appendix A2:	*Cottonwood & Edgemont Warehouse Health Risk Assessment*
Technical Appendix B:	*General Biological Resources Assessment for the Cottonwood and Edgemont Project*
Technical Appendix C:	*Phase I Cultural Resources Survey for the Cottonwood & Edgemont Project*
Technical Appendix D:	*Cottonwood & Edgemont Warehouse Energy Analysis*
Technical Appendix E:	*Preliminary Geotechnical and Infiltration Feasibility Investigation Proposed Industrial Development APNs 263-190-012, -014, -015, -016, -017, -019 and -036*
Technical Appendix F:	*Paleontological Assessment Cottonwood & Edgemont Project*
Technical Appendix G:	*Cottonwood & Edgemont Greenhouse Gas Analysis*
Technical Appendix H	*Phase I Environmental Site Assessment*
Technical Appendix I1:	*Preliminary Water Quality Management Plan – Old 215 Frontage Road*

Technical Appendix I2:	*Preliminary Drainage Analysis for APN 263-190-014-019,036 Old 215/Edgemont Street PEN21-0325/LST22-0007*
Technical Appendix J1:	*Cottonwood & Edgemont Warehouse Noise Impact Analysis*
Technical Appendix J2:	*Cottonwood & Edgemont Warehouse Off-Site Improvements Noise Assessment*
Technical Appendix K1:	*Cottonwood & Edgemont Warehouse Trip Generation Assessment*
Technical Appendix K2:	*Cottonwood and Edgemont Warehouse Vehicle Miles Traveled (VMT) Evaluation*
Technical Appendix K3:	*Cottonwood & Edgemont Warehouses (PEN21-0325) Traffic Analysis*

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 -	Home Owners' 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 -	Storm Water Pollution Prevention Plan
SWRCB -	State Water Resources Control Board
USFWS -	United States Fish and Wildlife
USGS -	United States Geologic Survey
VMT -	Vehicle Miles Traveled
VVUSD -	Valley Verde Unified School District
WQMP -	Water Quality Management Plan
WRCOG -	Western Riverside Council of Government

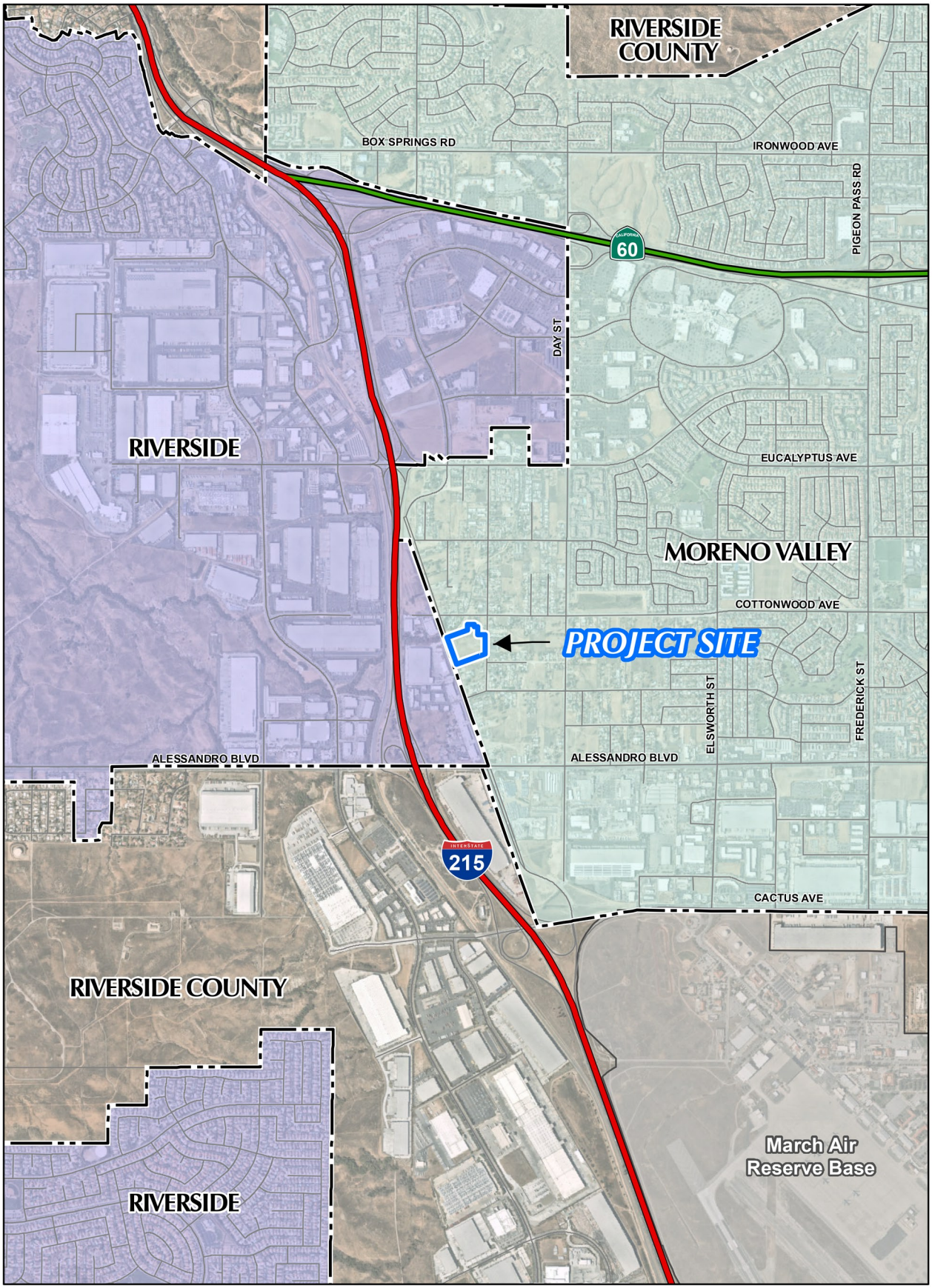


Source(s): ESRI, RCTLMA (2022)

Figure 1

0 0.5 1 2 Miles

Regional Map

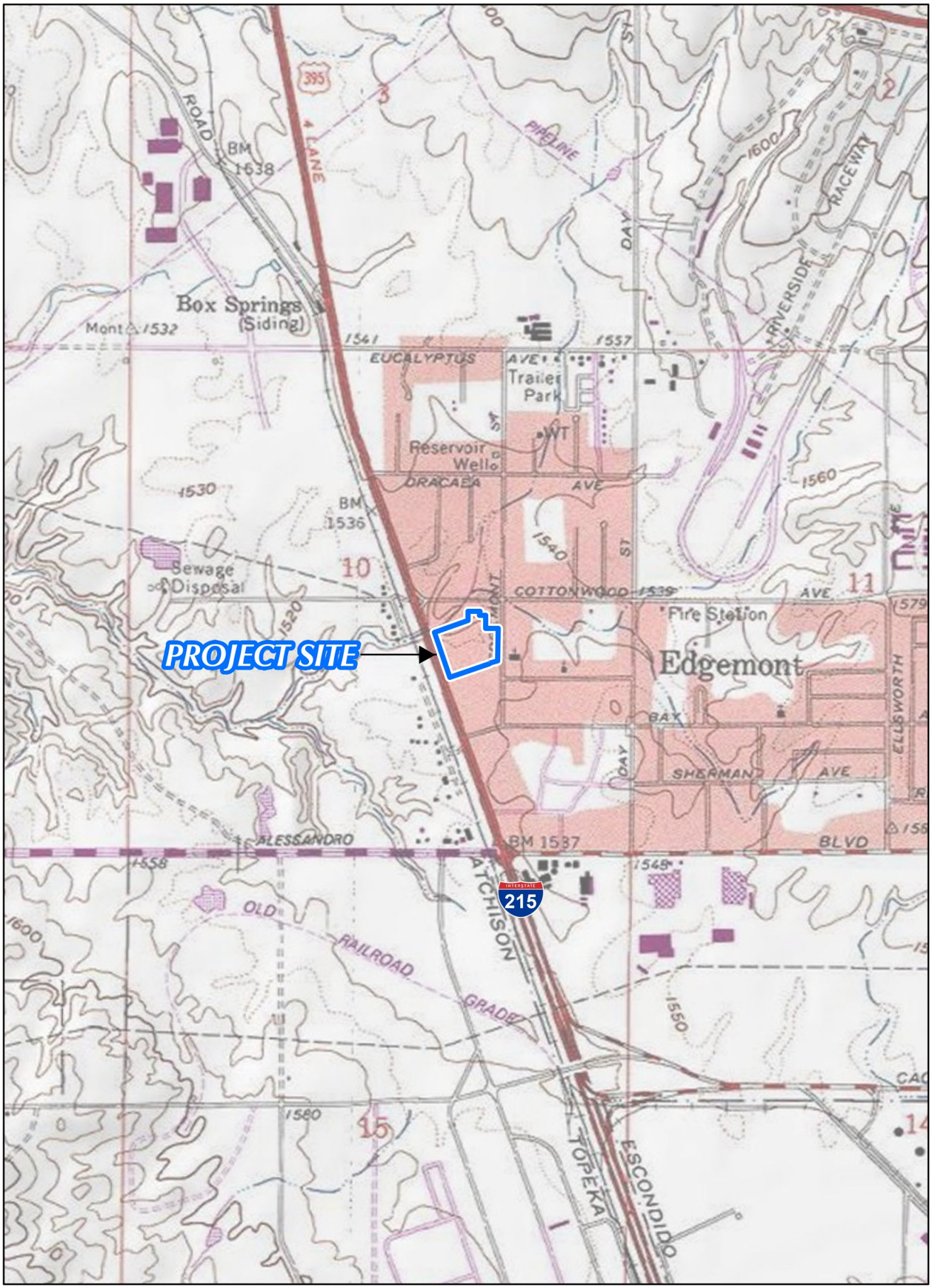


Source(s): ESRI, Nearmap Imagery (2022), RCTLMA (2022)

Figure 2

0 625 1,250 2,500 Feet

Vicinity Map

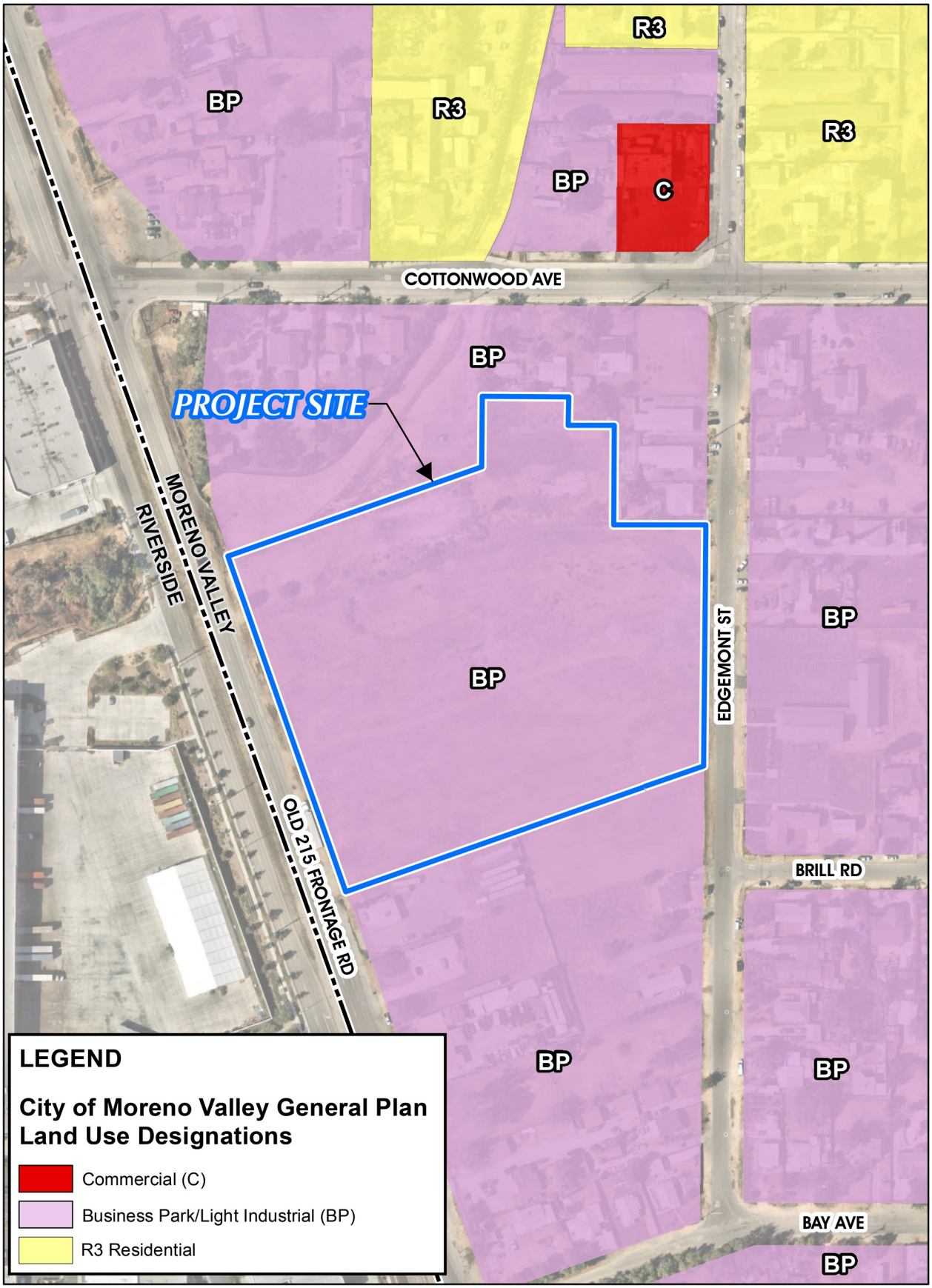


Source(s): USGS (2013)

Figure 3

0 375 750 1,500 Feet

USGS Topographic Map

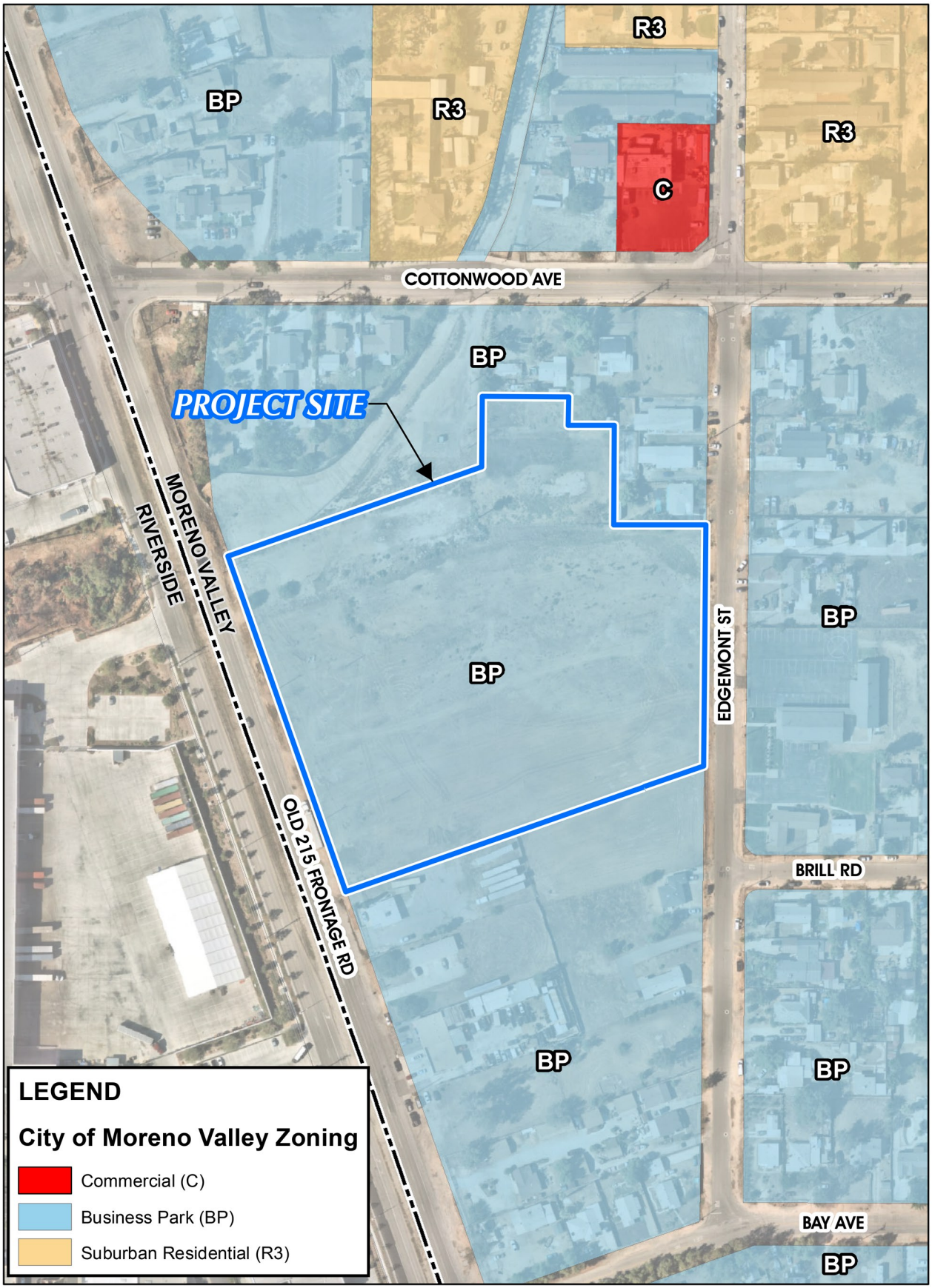


Source(s): City of Moreno Valley (2020), ESRI, Nearmap Imagery (2022), RCTLMA (2022)

Figure 4

0 50 100 200 Feet

Existing General Plan Land Use



Source(s): City of Moreno Valley (2021), ESRI, Nearmap Imagery (2022), RCTLMA (2022)

Figure 5

0 50 100 200 Feet

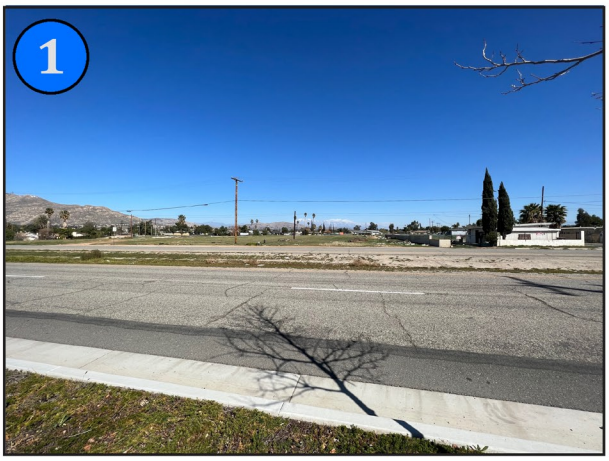
Existing Zoning

Source(s): ESRI, Nearmap Imagery (2022), RCTLMA (2022)

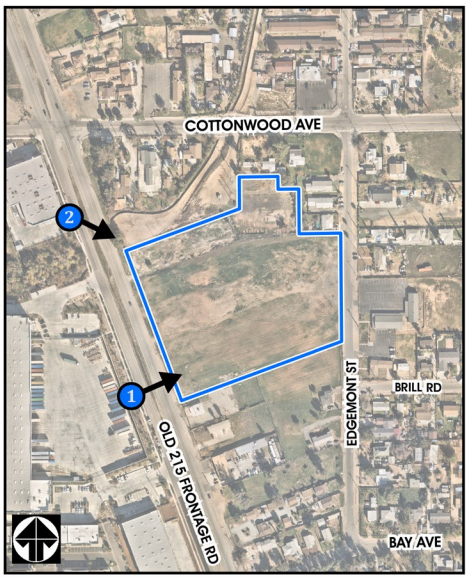
Figure 6

0 50 100 200
Feet

Aerial Photograph



View 1: Southwest of the Project Site along
Old 215 Frontage Rd. looking east.



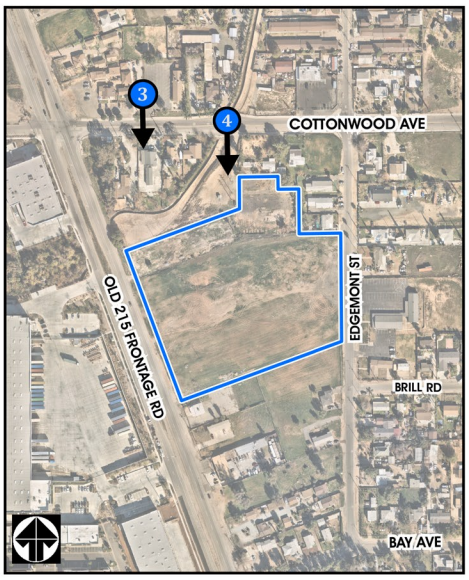
View 2: Northwest of the Project Site along
Old 215 Frontage Rd. looking southeast.

Figure 7

Not to Scale

Sit Photos - Views from the West

View 3: North of the Project Site along Cottonwood Ave. looking south.



View 4: North of the Project Site along Cottonwood Ave. looking south.

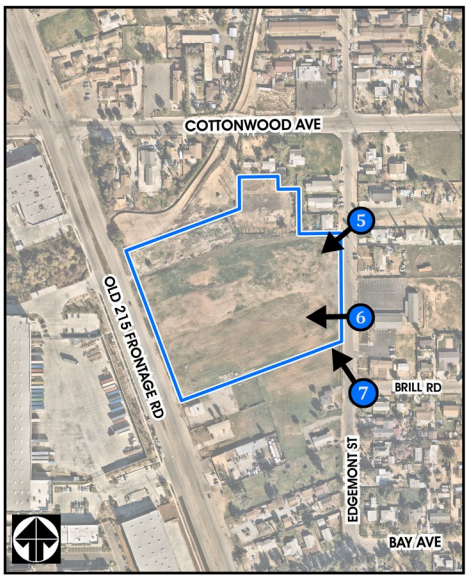
Figure 8

Not to Scale

Site Photos - Views from the North

View 5: Northeast of the Project Site along Edgemont St. looking southwest.

View 6: East of the Project Site along Edgemont St. looking west.

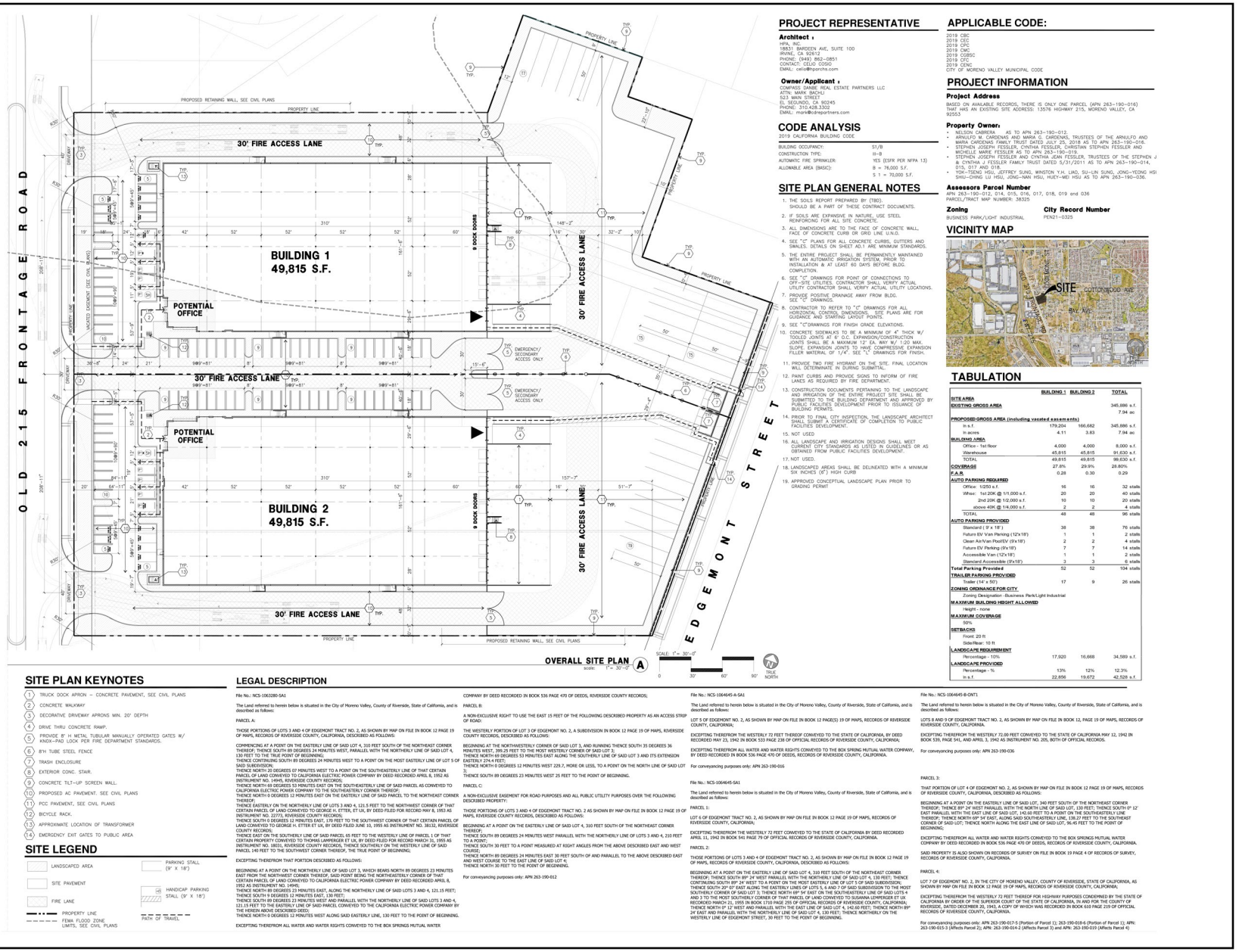


View 7: Southeast of the Project Site along Edgemont St. looking northwest.

Figure 9

Not to Scale

Site Photos - Views from the East



PROJECT REPRESENTATIVE

Architect :
HPA, INC.
18831 BARDEEN AVE, SUITE 100
IRVINE, CA 92612
PHONE: (949) 862-0851
CONTACT: CELIO COSIO
EMAIL: celio@hparchs.com

Owner/Applicant :
COMPASS DANBE REAL ESTATE PARTNERS LLC
ATTN: MARK BACHLI
523 MAIN STREET
EL SEGUNDO, CA 90245
PHONE: 310.428.3302
EMAIL: mark@cdrepartners.com

CODE ANALYSIS

2019 CALIFORNIA BUILDING CODE

BUILDING OCCUPANCY:	S1/B
CONSTRUCTION TYPE:	II-B
AUTOMATIC FIRE SPRINKLER:	YES (ESFR PER NFPA 13)
ALLOWABLE AREA (BASIC):	B = 76,000 S.F. S 1 = 70,000 S.F.

SITE PLAN GENERAL NOTES

1. THE SOILS REPORT PREPARED BY (TBD). SHOULD BE A PART OF THESE CONTRACT DOCUMENTS.
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES. DETAILS ON SHEET AD.1 ARE MINIMUM STANDARDS.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM. PRIOR TO INSTALLATION & AT LEAST 60 DAYS BEFORE BLDG. COMPLETION.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS.
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. SEE "C"DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY W/ 1:20 MAX. SLOPE. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". SEE "L" DRAWINGS FOR FINISH.
11. PROVIDE TWO FIRE HYDRANT ON THE SITE. FINAL LOCATION WILL DETERMINATE IN DURING SUBMITTAL.
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. NOT USED
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. NOT USED.
18. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB
19. APPROVED CONCEPTUAL LANDSCAPE PLAN PRIOR TO GRADING PERMIT

APPLICABLE CODE:

2019 CBC
2019 CEC
2019 CPC
2019 CMC
2019 CGBSC
2019 CFC
2019 CENC
CITY OF MORENO VALLEY MUNICIPAL CODE

PROJECT INFORMATION

Project Address

BASED ON AVAILABLE RECORDS, THERE IS ONLY ONE PARCEL (APN 263-190-016) THAT HAS AN EXISTING SITE ADDRESS: 13576 HIGHWAY 215, MORENO VALLEY, CA 92553

Property Owner:

- NELSON CABRERA AS TO APN 263-190-012.
- ARNULFO M. CARDENAS AND MARIA G. CARDENAS, TRUSTEES OF THE ARNULFO AND MARIA CARDENAS FAMILY TRUST DATED JULY 25, 2018 AS TO APN 263-190-018.
- STEPHEN JOSEPH FESSLER, CYNTHIA FESSLER, CHRISTIAN STEPHEN FESSLER AND MICHELLE MARIE FESSLER AS TO APN 263-190-019.
- STEPHEN JOSEPH FESSLER AND CYNTHIA JEAN FESSLER, TRUSTEES OF THE STEPHEN J & CYNTHIA J FESSLER FAMILY TRUST DATED 5/31/2011 AS TO APN 263-190-014, 015, 017 AND 018.
- YOK-TSENG HSU, JEFFREY SUNG, WINSTON Y.H. LIAO, SU-LIN SUNG, JONG-YEONG HSI SHIU-CHING LU HSU, JONG-NAN HSU, HUEY-MEI HSU AS TO APN 263-190-036.

Assessors Parcel Number

APN 263-190-012, 014, 015, 016, 017, 018, 019 and 036
PARCEL/TRACT MAP NUMBER: 38325

Zoning	City Record Number
BUSINESS PARK/LIGHT INDUSTRIAL	PEN21-0325

VICINITY MAP

TABULATION

	BUILDING 1	BUILDING 2	TOTAL
SITE AREA			
EXISTING GROSS AREA			345,886 s.f. 7.94 ac
PROPOSED GROSS AREA (including vacated easements)			
In s.f.	179,204	166,682	345,886 s.f.
In acres	4.11	3.83	7.94 ac
BUILDING AREA			
Office - 1st floor	4,000	4,000	8,000 s.f.
Warehouse	45,815	45,815	91,630 s.f.
TOTAL	49,815	49,815	99,630 s.f.
COVERAGE	27.8%	29.9%	28.80%
F.A.R.	0.28	0.30	0.29
AUTO PARKING REQUIRED			
Office: 1/250 s.f.	16	16	32 stalls
Whse: 1st 20K @ 1/1,000 s.f.	20	20	40 stalls
2nd 20K @ 1/2,000 s.f.	10	10	20 stalls
above 40K @ 1/4,000 s.f.	2	2	4 stalls
TOTAL	48	48	96 stalls
AUTO PARKING PROVIDED			
Standard (9' x 18')	38	38	76 stalls
Future EV Van Parking (12'x18')	1	1	2 stalls
Clean Air/Van Pool/EV (9'x18')	2	2	4 stalls
Future EV Parking (9'x18')	7	7	14 stalls
Accessible Van (12'x18')	1	1	2 stalls
Standard Accessible (9'x18')	3	3	6 stalls
Total Parking Provided	52	52	104 stalls
TRAILER PARKING PROVIDED			
Trailer (14' x 50')	17	9	26 stalls
ZONING ORDINANCE FOR CITY			
Zoning Designation - Business Park/Light Industrial			
MAXIMUM BUILDING HEIGHT ALLOWED			
Height - none			
MAXIMUM COVERAGE			
50%			
SETBACKS			
Front: 20 ft			
Side/Rear: 10 ft			
LANDSCAPE REQUIREMENT			
Percentage - 10%	17,920	16,668	34,589 s.f.
LANDSCAPE PROVIDED			
Percentage - %	13%	12%	12.3%
In s.f.	22,856	19,672	42,528 s.f.

SITE PLAN KEYNOTES

1. TRUCK DOCK APRON – CONCRETE PAVEMENT, SEE CIVIL PLANS
2. CONCRETE WALKWAY
3. DECORATIVE DRIVEWAY APRONS MIN. 20' DEPTH
4. DRIVE THRU CONCRETE RAMP.
5. PROVIDE 8' H. METAL TUBULAR MANUALLY OPERATED GATES W/ KNOX-PAD LOCK PER FIRE DEPARTMENT STANDARDS.
6. 8'H TUBE STEEL FENCE
7. TRASH ENCLOSURE
8. EXTERIOR CONC. STAIR.
9. CONCRETE TILT-UP SCREEN WALL.
10. PROPOSED AC PAVEMENT. SEE CIVIL PLANS
11. PCC PAVEMENT, SEE CIVIL PLANS
12. BICYCLE RACK.
13. APPROXIMATE LOCATION OF TRANSFORMER
14. EMERGENCY EXIT GATES TO PUBLIC AREA

SITE LEGEND

- LANDSCAPED AREA
- SITE PAVEMENT
- FIRE LANE
- PROPERTY LINE
- FEMA FLOOD ZONE LIMITS, SEE CIVIL PLANS
- PARKING STALL (9' X 18')
- HANDICAP PARKING STALL (9' X 18')
- PATH OF TRAVEL

LEGAL DESCRIPTION

File No.: NCS-1063280-SA1

The Land referred to herein below is situated in the City of Moreno Valley, County of Riverside, State of California, and is described as follows:

PARCEL A:

THOSE PORTIONS OF LOTS 3 AND 4 OF EDGEMONT TRACT NO. 2, AS SHOWN BY MAP ON FILE IN BOOK 12 PAGE 19 OF MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA, DESCRIBED AS FOLLOWS:

COMMENCING AT A POINT ON THE EASTERLY LINE OF SAID LOT 4, 310 FEET SOUTH OF THE NORTHEAST CORNER THEREOF; THENCE SOUTH 89 DEGREES 24 MINUTES WEST, PARALLEL WITH THE NORTHERLY LINE OF SAID LOT 4, 130 FEET TO THE TRUE POINT OF BEGINNING;
THENCE CONTINUING SOUTH 89 DEGREES 24 MINUTES WEST TO A POINT ON THE MOST EASTERLY LINE OF LOT 5 OF SAID SUBDIVISION;
THENCE NORTH 20 DEGREES 07 MINUTES WEST TO A POINT ON THE SOUTHEASTERLY LINE OF THAT CERTAIN PARCEL OF LAND CONVEYED TO CALIFORNIA ELECTRIC POWER COMPANY BY DEED RECORDED APRIL 8, 1952 AS INSTRUMENT NO. 14945, RIVERSIDE COUNTY RECORDS;
THENCE NORTH 69 DEGREES 53 MINUTES EAST ON THE SOUTHEASTERLY LINE OF SAID PARCEL AS CONVEYED TO CALIFORNIA ELECTRIC POWER COMPANY TO THE SOUTHEASTERLY CORNER THEREOF;
THENCE NORTH 0 DEGREES 12 MINUTES EAST ON THE EASTERLY LINE OF SAID PARCEL TO THE NORTHEAST CORNER THEREOF;
THENCE EASTERLY ON THE NORTHERLY LINE OF LOTS 3 AND 4, 121.5 FEET TO THE NORTHWEST CORNER OF THAT CERTAIN PARCEL OF LAND CONVEYED TO GEORGE H. ETTER, ET UX, BY DEED FILED FOR RECORD MAY 8, 1953 AS INSTRUMENT NO. 22773, RIVERSIDE COUNTY RECORDS;
THENCE SOUTH 0 DEGREES 12 MINUTES EAST, 170 FEET TO THE SOUTHWEST CORNER OF THAT CERTAIN PARCEL OF LAND CONVEYED TO GEORGE H. ETTER ET UX, BY DEED FILED JUNE 10, 1955 AS INSTRUMENT NO. 38132, RIVERSIDE COUNTY RECORDS;
THENCE EAST ON THE SOUTHERLY LINE OF SAID PARCEL 65 FEET TO THE WESTERLY LINE OF PARCEL 1 OF THAT CERTAIN PROPERTY CONVEYED TO THOMAS LAMPERGER ET UX, BY DEED FILED FOR RECORD MARCH 31, 1955 AS INSTRUMENT NO. 18031, RIVERSIDE COUNTY RECORDS, THENCE SOUTHERLY ON THE WESTERLY LINE OF SAID PARCEL 140 FEET TO THE SOUTHWEST CORNER THEREOF, THE TRUE POINT OF BEGINNING.

EXCEPTING THEREFROM THAT PORTION DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE NORTHERLY LINE OF SAID LOT 3, WHICH BEARS NORTH 89 DEGREES 23 MINUTES EAST FROM THE NORTHWEST CORNER THEREOF, SAID POINT BEING THE NORTHEASTERLY CORNER OF THAT CERTAIN PARCEL OF LAND CONVEYED TO CALIFORNIA ELECTRIC POWER COMPANY BY DEED RECORDED APRIL 8, 1952 AS INSTRUMENT NO. 14945;
THENCE NORTH 89 DEGREES 23 MINUTES EAST, ALONG THE NORTHERLY LINE OF SAID LOTS 3 AND 4, 121.15 FEET;
THENCE SOUTH 0 DEGREES 12 MINUTES EAST, 130 FEET;
THENCE SOUTH 89 DEGREES 23 MINUTES WEST AND PARALLEL WITH THE NORTHERLY LINE OF SAID LOTS 3 AND 4, 121.15 FEET TO THE EASTERLY LINE OF SAID PARCEL CONVEYED TO THE CALIFORNIA ELECTRIC POWER COMPANY BY THE HEREIN ABOVE DESCRIBED DEED;
THENCE NORTH 0 DEGREES 12 MINUTES WEST ALONG SAID EASTERLY LINE, 130 FEET TO THE POINT OF BEGINNING.

EXCEPTING THEREFROM ALL WATER AND WATER RIGHTS CONVEYED TO THE BOX SPRINGS MUTUAL WATER COMPANY BY DEED RECORDED IN BOOK 536 PAGE 470 OF DEEDS, RIVERSIDE COUNTY RECORDS;

PARCEL B:

A NON-EXCLUSIVE RIGHT TO USE THE EAST 15 FEET OF THE FOLLOWING DESCRIBED PROPERTY AS AN ACCESS STRIP OF ROAD:

THE WESTERLY PORTION OF LOT 3 OF EDGEMONT NO. 2, A SUBDIVISION IN BOOK 12 PAGE 19 OF MAPS, RIVERSIDE COUNTY RECORDS, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWESTERLY CORNER OF SAID LOT 3, AND RUNNING THENCE SOUTH 35 DEGREES 36 MINUTES WEST, 399.25 FEET TO THE MOST WESTERLY CORNER OF SAID LOT 3;
THENCE NORTH 69 DEGREES 53 MINUTES EAST ALONG THE SOUTHERLY LINE OF SAID LOT 3 AND ITS EXTENSION EASTERLY 274.4 FEET;
THENCE NORTH 0 DEGREES 12 MINUTES WEST 229.7, MORE OR LESS, TO A POINT ON THE NORTH LINE OF SAID LOT 3;
THENCE SOUTH 89 DEGREES 23 MINUTES WEST 25 FEET TO THE POINT OF BEGINNING.

PARCEL C:

A NON-EXCLUSIVE EASEMENT FOR ROAD PURPOSES AND ALL PUBLIC UTILITY PURPOSES OVER THE FOLLOWING DESCRIBED PROPERTY:

THOSE PORTIONS OF LOTS 3 AND 4 OF EDGEMONT TRACT NO. 2 AS SHOWN BY MAP ON FILE IN BOOK 12 PAGE 19 OF MAPS, RIVERSIDE COUNTY RECORDS, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE EASTERLY LINE OF SAID LOT 4, 310 FEET SOUTH OF THE NORTHEAST CORNER THEREOF;
THENCE SOUTH 89 DEGREES 24 MINUTES WEST PARALLEL WITH THE NORTHERLY LINE OF LOTS 3 AND 4, 210 FEET TO A POINT;
THENCE SOUTH 30 FEET TO A POINT MEASURED AT RIGHT ANGLES FROM THE ABOVE DESCRIBED EAST AND WEST COURSE;
THENCE NORTH 89 DEGREES 24 MINUTES EAST 30 FEET SOUTH OF AND PARALLEL TO THE ABOVE DESCRIBED EAST AND WEST COURSE TO THE EAST LINE OF SAID LOT 4;
THENCE NORTH 30 FEET TO THE POINT OF BEGINNING.

For conveyancing purposes only: APN 263-190-012

File No.: NCS-1064645-A-SA1

The Land referred to herein below is situated in the City of Moreno Valley, County of Riverside, State of California, and is described as follows:

LOT 5 OF EDGEMONT NO. 2, AS SHOWN BY MAP ON FILE IN BOOK 12 PAGE(S) 19 OF MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA;

EXCEPTING THEREFROM THE WESTERLY 72 FEET THEREOF CONVEYED TO THE STATE OF CALIFORNIA, BY DEED RECORDED MAY 23, 1942 IN BOOK 533 PAGE 238 OF OFFICIAL RECORDS OF RIVERSIDE COUNTY, CALIFORNIA;

EXCEPTING THEREFROM ALL WATER AND WATER RIGHTS CONVEYED TO THE BOX SPRING MUTUAL WATER COMPANY, BY DEED RECORDED IN BOOK 536 PAGE 470 OF DEEDS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

For conveyancing purposes only: APN 263-190-016

File No.: NCS-1064645-SA1

The Land referred to herein below is situated in the City of Moreno Valley, County of Riverside, State of California, and is described as follows:

PARCEL 1:

LOT 6 OF EDGEMONT TRACT NO. 2, AS SHOWN BY MAP ON FILE IN BOOK 12 PAGE 19 OF MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA;

EXCEPTING THEREFROM THE WESTERLY 72 FEET CONVEYED TO THE STATE OF CALIFORNIA BY DEED RECORDED APRIL 11, 1942 IN BOOK 541 PAGE 79 OF OFFICIAL RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

PARCEL 2:

THOSE PORTIONS OF LOTS 3 AND 4 OF EDGEMONT TRACT NO. 2, AS SHOWN BY MAP ON FILE IN BOOK 12 PAGE 19 OF MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE EASTERLY LINE OF SAID LOT 4, 310 FEET SOUTH OF THE NORTHEAST CORNER THEREOF; THENCE SOUTH 89° 24' WEST PARALLEL WITH THE NORTHERLY LINE OF SAID LOT 4, 130 FEET; THENCE CONTINUING SOUTH 89° 24' WEST TO A POINT ON THE MOST EASTERLY LINE OF LOT 5 OF SAID SUBDIVISION; THENCE SOUTH 20° 07' EAST ALONG THE EASTERLY LINES OF LOTS 5, 6 AND 7 OF SAID SUBDIVISION TO THE MOST SOUTHERLY CORNER OF SAID LOT 7; THENCE NORTH 69° 54' EAST ON THE SOUTHEASTERLY LINE OF SAID LOTS 4 AND 3 TO THE MOST SOUTHERLY CORNER OF THAT PARCEL OF LAND CONVEYED TO SUSANNA LEMPERGER ET UX RECORDED MARCH 31, 1955 IN BOOK 1710 PAGE 255 OF OFFICIAL RECORDS OF RIVERSIDE COUNTY, CALIFORNIA; THENCE NORTH 0° 12' WEST AND PARALLEL WITH THE EAST LINE OF SAID LOT 4, 142.60 FEET; THENCE NORTH 89° 24' EAST AND PARALLEL WITH THE NORTHERLY LINE OF SAID LOT 4, 130 FEET; THENCE NORTHERLY ON THE WESTERLY LINE OF EDGEMONT STREET, 30 FEET TO THE POINT OF BEGINNING.

File No.: NCS-1064645-B-ONT1

The Land referred to herein below is situated in the City of Moreno Valley, County of Riverside, State of California, and is described as follows:

LOTS 8 AND 9 OF EDGEMONT TRACT NO. 2, AS SHOWN BY MAP ON FILE IN BOOK 12, PAGE 19 OF MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

EXCEPTING THEREFROM THE WESTERLY 72.00 FEET CONVEYED TO THE STATE OF CALIFORNIA MAY 12, 1942 IN BOOK 539, PAGE 541, AND APRIL 3, 1942 AS INSTRUMENT NO. 205, BOTH OF OFFICIAL RECORDS.

For conveyancing purposes only: APN 263-190-036

PARCEL 3:

THAT PORTION OF LOT 4 OF EDGEMONT NO. 2, AS SHOWN BY MAP ON FILE IN BOOK 12 PAGE 19 OF MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA, DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE EASTERLY LINE OF SAID LOT, 340 FEET SOUTH OF THE NORTHEAST CORNER THEREOF; THENCE 89° 24' WEST PARALLEL WITH THE NORTH LINE OF SAID LOT, 130 FEET; THENCE SOUTH 0° 12' EAST PARALLEL WITH THE EAST LINE OF SAID LOT, 142.60 FEET TO A POINT ON THE SOUTHEASTERLY LINE THEREOF; THENCE NORTH 69° 54' EAST, ALONG SAID SOUTHEASTERLY LINE, 139.27 FEET TO THE SOUTHEAST CORNER OF SAID LOT; THENCE NORTH ALONG THE EAST LINE OF SAID LOT, 96.45 FEET TO THE POINT OF BEGINNING;

EXCEPTING THEREFROM ALL WATER AND WATER RIGHTS CONVEYED TO THE BOX SPRINGS MUTUAL WATER COMPANY BY DEED RECORDED IN BOOK 536 PAGE 470 OF DEEDS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

SAID PROPERTY IS ALSO SHOWN ON RECORDS OF SURVEY ON FILE IN BOOK 19 PAGE 4 OF RECORDS OF SURVEY, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

PARCEL 4:

LOT 7 OF EDGEMONT NO. 2, IN THE CITY OF MORENO VALLEY, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AS SHOWN BY MAP ON FILE IN BOOK 12 PAGE 19 OF MAPS, RECORDS OF RIVERSIDE COUNTY, CALIFORNIA;

EXCEPTING THEREFROM THE WESTERLY 72 FEET THEREOF FOR HIGHWAY PURPOSES CONDEMNED BY THE STATE OF CALIFORNIA BY ORDER OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, IN AND FOR THE COUNTY OF RIVERSIDE, DATED DECEMBER 20, 1943, A COPY OF WHICH WAS RECORDED IN BOOK 610 PAGE 219 OF OFFICIAL RECORDS OF RIVERSIDE COUNTY, CALIFORNIA.

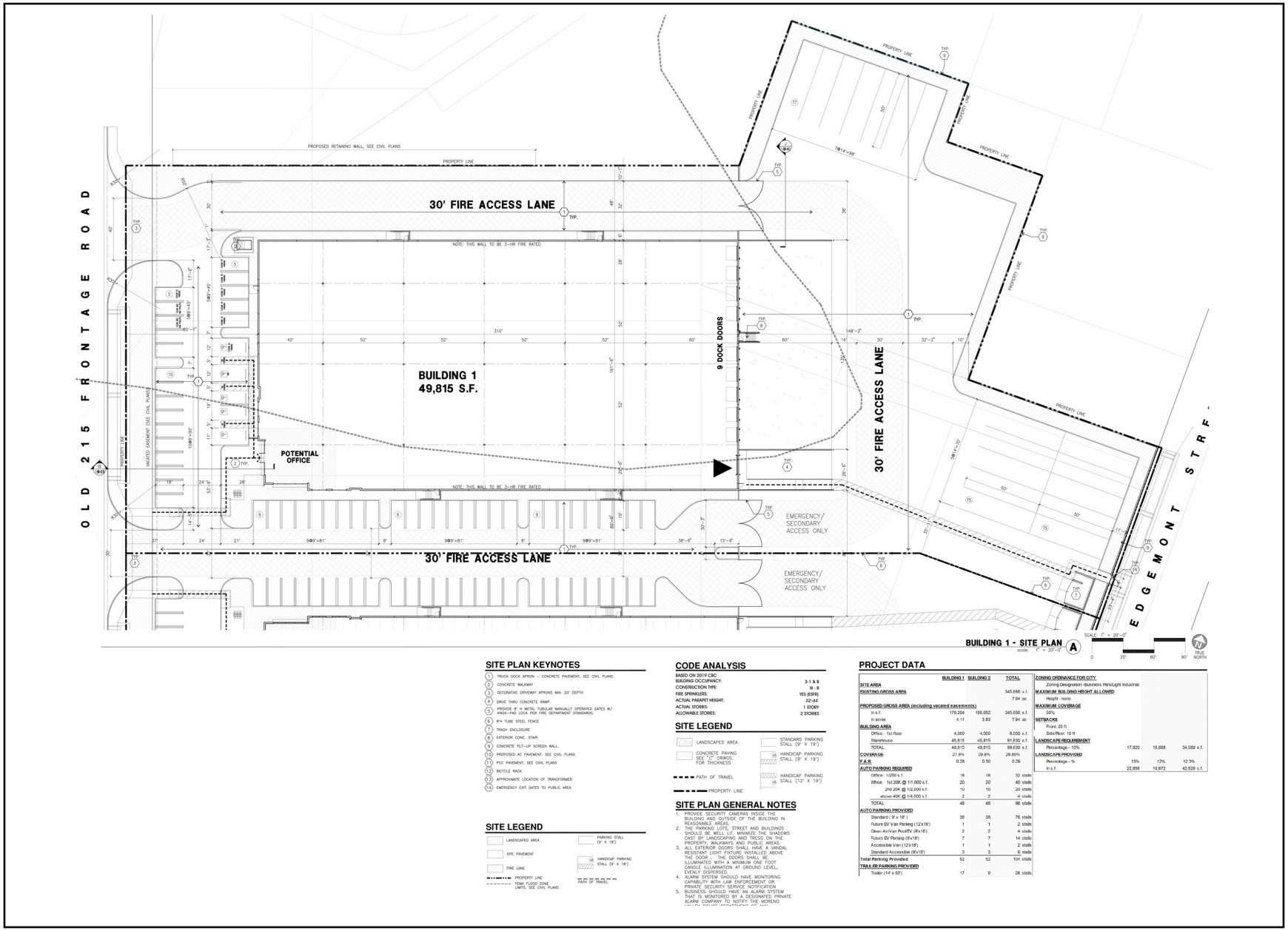
For conveyancing purposes only: APN 263-190-017-5 (Portion of Parcel 1); 263-190-018-6 (Portion of Parcel 1); APN: 263-190-015-3 (Affects Parcel 2); APN: 263-190-014-2 (Affects Parcel 3) and APN: 263-190-019 (Affects Parcel 4)

Source(s): HPA (03-18-2022)

Figure 10

Not to Scale

Project Site Plan

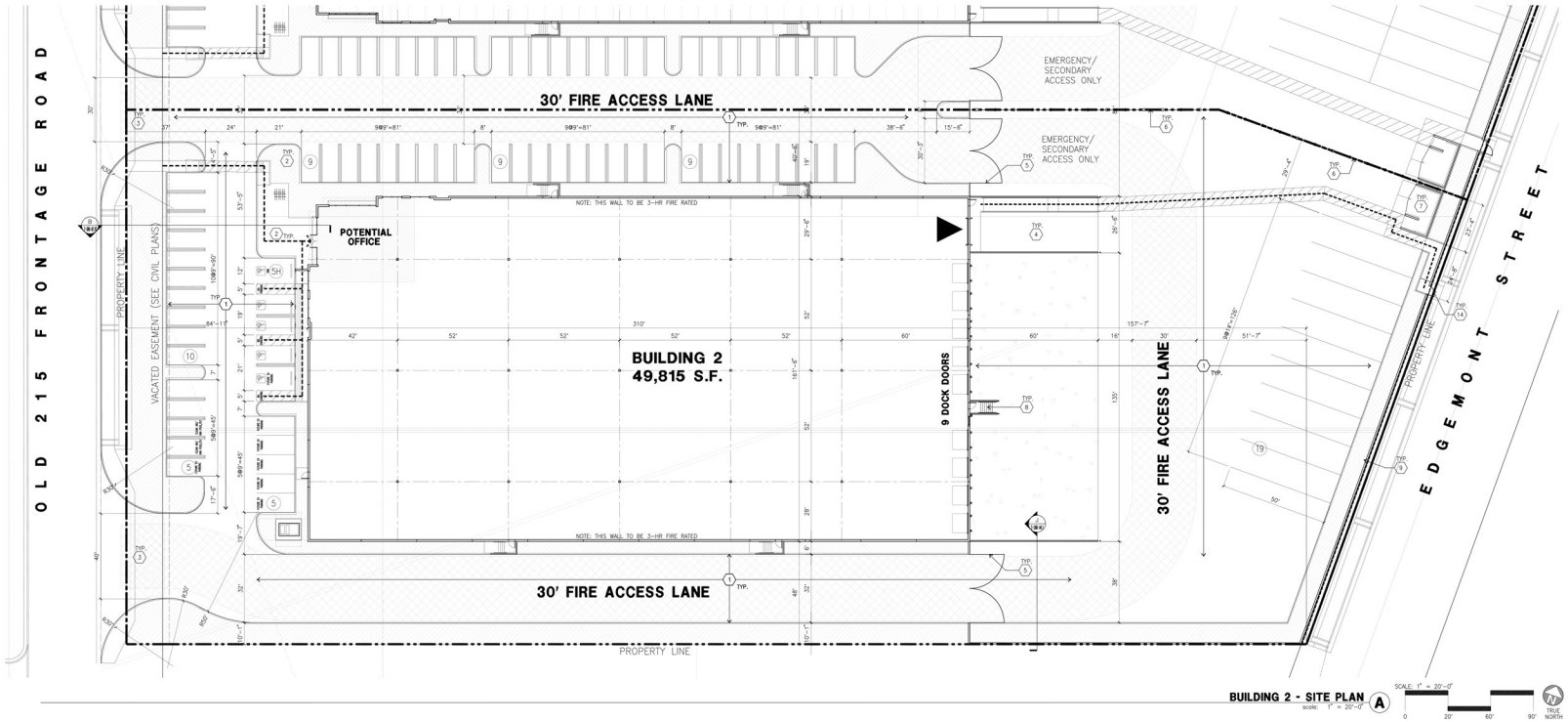


Source(s): HPA (03-18-2022)

Figure 11

Not to Scale

Site Plan - Building 1



SITE PLAN KEYNOTES

1. TRUCK DOCK APRON – CONCRETE PAVEMENT, SEE CIVIL PLANS
2. CONCRETE WALKWAY
3. DECORATIVE DRIVEWAY APRONS MIN. 20' DEPTH
4. DRIVE THRU CONCRETE RAMP.
5. PROVIDE 8' H METAL TUBULAR MANUALLY OPERATED GATES W/ KNOX-PAD LOCK PER FIRE DEPARTMENT STANDARDS.
6. 8'H TUBE STEEL FENCE
7. TRASH ENCLOSURE
8. EXTERIOR CONC. STAIR.
9. CONCRETE TILT-UP SCREEN WALL.
10. PROPOSED AC PAVEMENT, SEE CIVIL PLANS
11. PCC PAVEMENT, SEE CIVIL PLANS
12. BICYCLE RACK.
13. APPROXIMATE LOCATION OF TRANSFORMER
14. EMERGENCY EXIT GATES TO PUBLIC AREA

SITE LEGEND

- LANDSCAPED AREA
- SITE PAVEMENT
- FIRE LANE
- PROPERTY LINE
- FEMA FLOOD ZONE LIMITS, SEE CIVIL PLANS
- PARKING STALL (9' X 18')
- HANDICAP PARKING STALL (9' X 18')
- PATH OF TRAVEL

CODE ANALYSIS

BASED ON 2019 CBC	
BUILDING OCCUPANCY:	S-1 & B
CONSTRUCTION TYPE:	III - B
FIRE SPRINKLERS:	YES (ESFR)
ACTUAL PARAPET HEIGHT:	32'-44'
ACTUAL STORIES:	1 STORY
ALLOWABLE STORIES:	2 STORIES

SITE LEGEND

- LANDSCAPED AREA
- CONCRETE PAVING SEE "C" DRWGS. FOR THICKNESS
- PATH OF TRAVEL
- PROPERTY LINE
- STANDARD PARKING STALL (9' X 19')
- HANDICAP PARKING STALL (9' X 19')
- HANDICAP PARKING STALL (12' X 19')

SITE PLAN GENERAL NOTES

1. PROVIDE SECURITY CAMERAS INSIDE THE BUILDING AND OUTSIDE OF THE BUILDING IN REASONABLE AREAS.
2. THE PARKING LOTS, STREET AND BUILDINGS SHOULD BE WELL LIT, MINIMIZE THE SHADOWS CAST BY LANDSCAPING AND TRESS ON THE PROPERTY, WALKWAYS AND PUBLIC AREAS.
3. ALL EXTERIOR DOORS SHALL HAVE A VANDAL RESISTANT LIGHT FIXTURE INSTALLED ABOVE THE DOOR . THE DOORS SHALL BE ILLUMINATED WITH A MINIMUM ONE FOOT CANDLE ILLUMINATION AT GROUND LEVEL, EVENLY DISPERSED.
4. ALARM SYSTEM SHOULD HAVE MONITORING CAPABILITY WITH LAW ENFORCEMENT OR PRIVATE SECURITY SERVICE NOTIFICATION
5. BUSINESS SHOULD HAVE AN ALARM SYSTEM THAT IS MONITORED BY A DESIGNATED PRIVATE ALARM COMPANY TO NOTIFY THE MORENO

PROJECT DATA

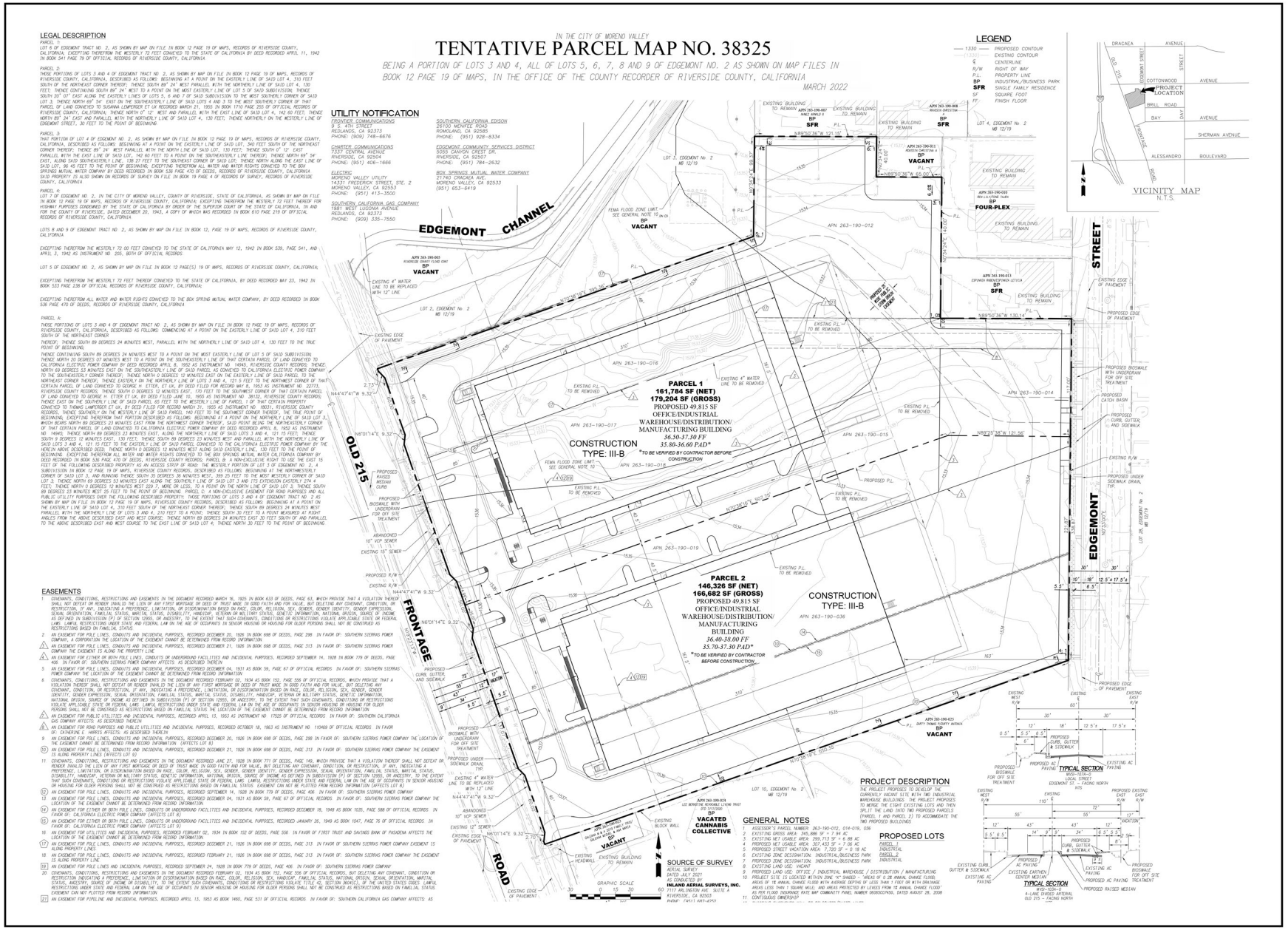
	BUILDING 1	BUILDING 2	TOTAL
SITE AREA			
EXISTING GROSS AREA			345,886 s.f.
			7.94 ac
PROPOSED GROSS AREA (including vacated easements)			
In s.f.	179,204	166,682	345,886 s.f.
In acres	4.11	3.83	7.94 ac
BUILDING AREA			
Office - 1st floor	4,000	4,000	8,000 s.f.
Warehouse	45,815	45,815	91,630 s.f.
TOTAL	49,815	49,815	99,630 s.f.
COVERAGE	27.8%	29.9%	28.80%
F.A.R.	0.28	0.30	0.29
AUTO PARKING REQUIRED			
Office: 1/250 s.f.	16	16	32 stalls
Whse: 1st 20K @ 1/1,000 s.f.	20	20	40 stalls
2nd 20K @ 1/2,000 s.f.	10	10	20 stalls
above 40K @ 1/4,000 s.f.	2	2	4 stalls
TOTAL	48	48	96 stalls
AUTO PARKING PROVIDED			
Standard (9' x 18')	38	38	76 stalls
Future EV Van Parking (12'x18')	1	1	2 stalls
Clean Air/Van Pool/EV (9'x18')	2	2	4 stalls
Future EV Parking (9'x18')	7	7	14 stalls
Accessible Van (12'x18')	1	1	2 stalls
Standard Accessible (9'x18')	3	3	6 stalls
Total Parking Provided	52	52	104 stalls
TRAILER PARKING PROVIDED			
Trailer (14' x 50')	17	9	26 stalls
ZONING ORDINANCE FOR CITY			
Zoning Designation -Business Park/Light Industrial			
MAXIMUM BUILDING HEIGHT ALLOWED			
Height - none			
MAXIMUM COVERAGE			
60%			
SETBACKS			
Front: 20 ft			
Side/Rear: 10 ft			
LANDSCAPE REQUIREMENT			
Percentage - 10%	17,920	16,668	34,589 s.f.
LANDSCAPE PROVIDED			
Percentage - %	13%	12%	12.3%
In s.f.	22,856	19,672	42,528 s.f.

Source(s): HPA (03-18-2022)

Figure 12

Not to Scale

Site Plan - Building 2

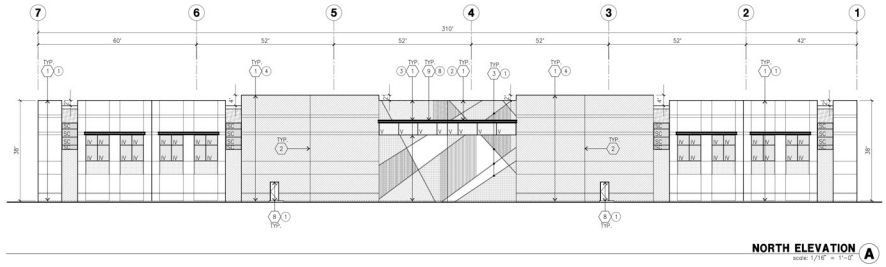


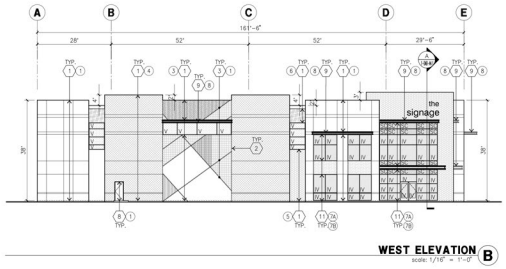
Source(s): CASC Engineering and Consulting (March 2022)

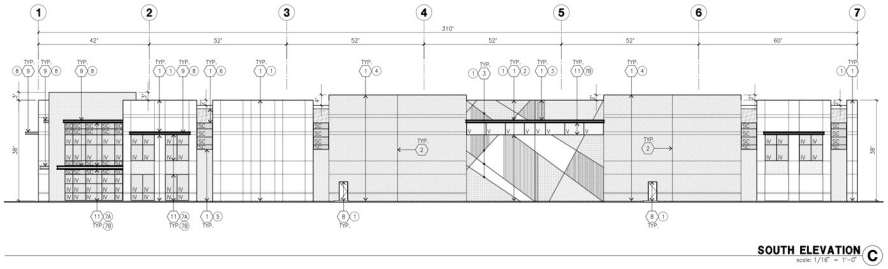
Figure 13

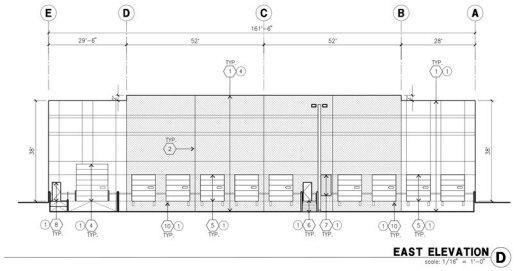
Not to Scale

Tentative Parcel Map No. 38325









KEYNOTES - ELEVATIONS

1. CONCRETE TILT-UP PANEL(PAINTED). FINISH GRADE VARIES. SEE "C" DRAWINGS. WATERPROOF ALL WALLS WHERE GRADE IS HIGHER AND EXPOSED TO THE WEATHER ONE SIDE. WATERPROOFING TO BE PROTECTED WITH PROTECTION BOARD AND A MIN. OF 6" OF GRAVEL. PROVIDE TRENCH DRAIN AT BOTTOM AND DAYLIGHT TO CURB OR TAKE TO STORM DRAIN. NOT REQUIRED AT DOCK HIGH CONDITION OR AT RAMP WALLS.
2. PANEL JOINT.
3. PANEL REVEAL. ALL REVEALS TO HAVE A MAX. OF 3/8" CHAMFER. REVEAL COLOR TO MATCH ADJACENT BUILDING FIELD COLOR. U.N.O.
4. OVERHEAD DOOR @ DRIVE THRU. SEE DOOR SCHEDULE. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND.
5. OVERHEAD DOOR @ DOCK HIGH. SEE DOOR SCHEDULE. PROVIDE COMPLETE WEATHER-STRIPPING PROTECTION ALL AROUND.
6. CONCRETE STAIR, LANDING AND GUARDRAIL W/ METAL PIPE HANDRAIL. PROVIDE NON SKID NOSING TO MEET ADA REQUIREMENTS. PROVIDE CONTRASTING COLORED 3" WIDE WARNING STRIPE INTEGRAL TO CONCRETE AT TOP LANDING AND BOTTOM TREAD PER ADA REQUIREMENTS.
7. METAL LOUVER, PAINT TO MATCH BUILDING COLOR.
8. HOLLOW METAL DOORS. PROVIDE COMPLETE WEATHER STRIPING ALL AROUND DOOR. PROVIDE FOR RAIN DIVERTER ABOVE DOOR.
9. METAL CANOPY.
10. DOCK BUMPER
11. ALUMINUM STOREFRONT FRAMING WITH TEMPERED GLAZING AT ALL DOORS, SIDELITES ADJACENT TO DOORS AND GLAZING WITH BOTTOMS LESS THAN 18" ABOVE FINISH FLOOR ELEVATION.
12. PROVIDE ILLUMINATED ADDRESS NUMBERS PER CITY/FIRE DEPARTMENT STANDARDS.

COLOR SCHEDULE - ELEVATIONS

1	CONCRETE TILT-UP PANEL	PAINT BRAND	SHERWIN WILLIAMS COLOR: SW 7005 PURE WHITE
2	CONCRETE TILT-UP PANEL	PAINT BRAND	SHERWIN WILLIAMS COLOR: SW 7071 GRAY SCREEN
3	CONCRETE TILT-UP PANEL	PAINT BRAND	SHERWIN WILLIAMS COLOR: SW 7072 ONLINE
4	CONCRETE TILT-UP PANEL	PAINT BRAND	SHERWIN WILLIAMS COLOR: SW 7073 NETWORK GRAY
5	CONCRETE TILT-UP PANEL	PAINT BRAND	SANDWASH CONCRETE FINISH PAINTED IN SHERWIN WILLIAMS COLOR: SW 7067 CITYSCAPE
6	CONCRETE TILT-UP PANEL	PAINT BRAND	SHERWIN WILLIAMS COLOR: SW 7075 WEB GRAY
7A	MULLIONS	COLOR	ALUMINUM BLACK ANODIZED MULLIONS
7B	GLAZING	COLOR	BLUE REFLECTIVE GLAZING
8	METAL CANOPY	PAINT BRAND	SHERWIN WILLIAMS PRO-INDUSTRIAL WATERBASED B53-1150 SEMI-GLOSS COLOR: SW 7069 IRON ORE
9	CONCRETE TILT-UP PANEL	FINISHES	TRESPA PURA NFC SIDING FLUSH SIDING/MATT FINISH 3020mm x 186mm x 8mm COLOR: Pu02 CLASSIC OAK

GLAZING LEGEND

NOTE: ALL EXTERIOR AND INTERIOR GLAZING SHALL BE TEMPERED.

IV — INSULATED VISION GLASS

SC — SPANDREL GLASS WITH CONCRETE BEHIND

V — SINGLE LITE VISION GLASS

IV : INSULATED VISION GLASS
1/4" PPG SOLARCOOL GRAYLITE + 1/4" SOLARBAN 60 CLEAR
1" INSULATED GLASS UNIT WITH 1/2" AIRSPACE AND 1/4" LITES
U: 0.29 SHGC: 0.1, VLT: 5%
MINIMUM VT TO BE 0.42 PER 2016 CEC TABLE 140.3-B

SC : SPANDREL WITH CONCRETE BEHIND
1/4" SOLARCOOL GRAYLITE WITH HARMONY GRAY OPACICOAT PAINTED ON REFLECTIVE. INSTALLED ON CONCRETE.

V : VISION GLASS
1/4" SOLARCOOL GRAYLITE II.

GENERAL NOTES - ELEVATIONS

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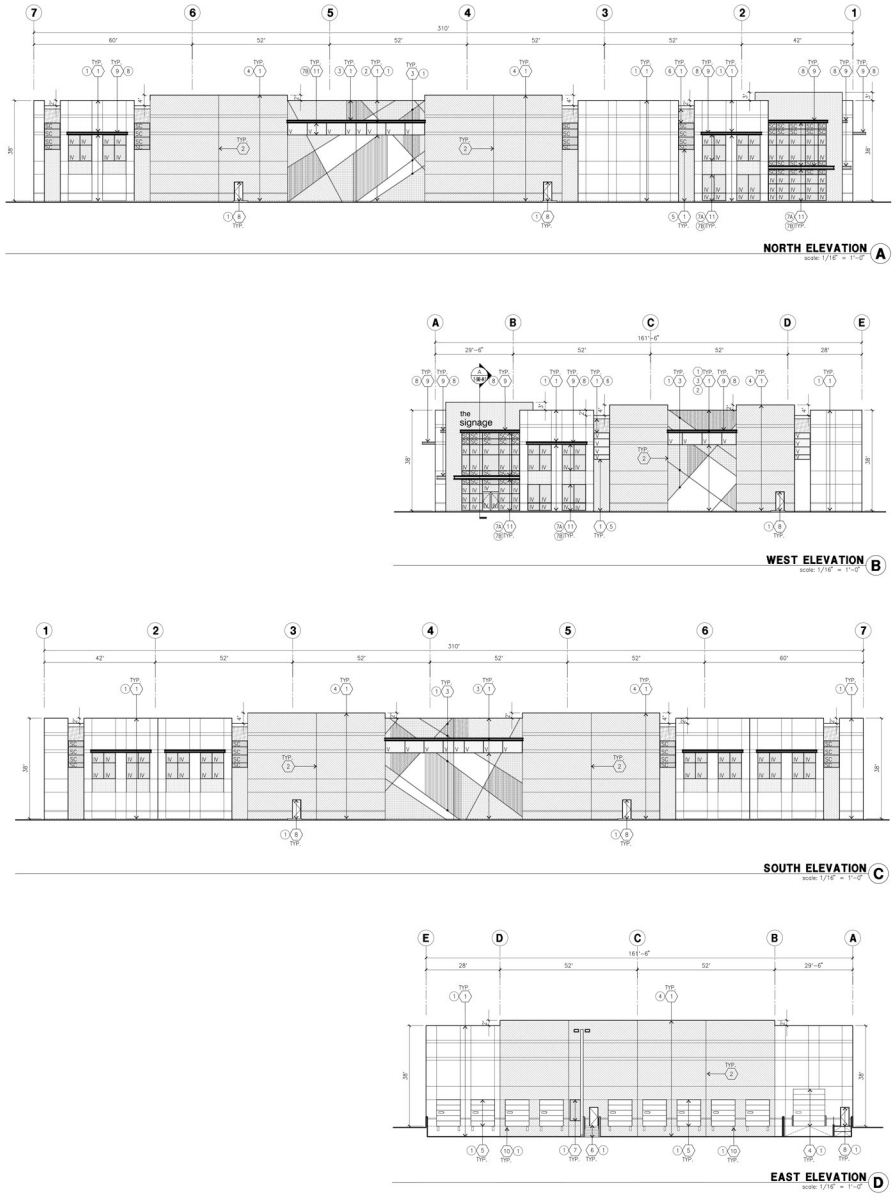
B. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
C. T.O.P. EL.= TOP OF PARAPET ELEVATION.
D. F.F. = FINISH FLOOR ELEVATION.
E. STOREFRONT CONSTRUCTION, GLASS, METAL ATTACHMENTS AND LINTELS SHALL BE DESIGNED TO RESIST 90 MPH, EXPOSURE "C" WINDS. CONTRACTOR SHALL SUBMIT SHOP DRAWINGS PRIOR TO INSTALLATION.
F. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
G. BACK SIDE OF PARAPETS TO HAVE SMOOTH FINISH AND BE PAINTED WITH ELASTOMERIC PAINT.
H. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH.
J. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
K. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON

Source(s): HPA (03-18-2022)

Figure 14

Not to Scale

Conceptual Architectural Elevations - Building 1



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7A	MULLIONS	COLOR	ALUMINUM BLACK ANODIZED MULLIONS
7B	GLAZING	COLOR	BLUE REFLECTIVE GLAZING
8	METAL CANOPY	PAINT BRAND	SHERWIN WILLIAMS PRO-INDUSTRIAL WATERBASED B53-1150 SEMI-GLOSS COLOR: SW 7069 IRON ORE
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NOTE: ALL EXTERIOR AND INTERIOR GLAZING SHALL BE TEMPERED.

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V : VISION GLASS
1/4" SOLARCOOL GRAYLITE II.

GENERAL NOTES - ELEVATIONS

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B. ALL PAINT FINISHES ARE TO BE FLAT UNLESS NOTED OTHERWISE.
C. T.O.P. EL.= TOP OF PARAPET ELEVATION.
D. F.F. = FINISH FLOOR ELEVATION.
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F. CONTRACTOR SHALL FULLY PAINT ONE CONCRETE PANEL W/ SELECTED COLORS. ARCHITECT AND OWNER SHALL APPROVE PRIOR TO PAINTING REMAINDER OF BUILDING.
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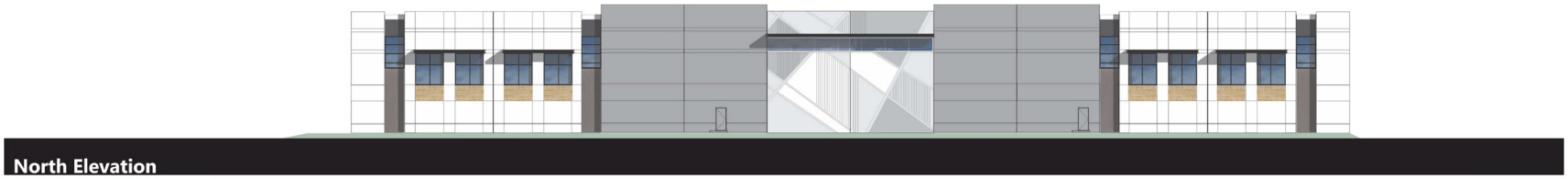
H. FOR SPANDREL GLAZING, ALLOW SPACE BEHIND SPANDREL TO BREATH.
J. USE ADHESIVE BACK WOOD STRIPS FOR ALL REVEAL FORMS.
K. THE FIRST COAT OF PAINT TO BE ROLLED-ON AND THE SECOND COAT TO BE SPRAYED-ON

Source(s): HPA (03-18-2022)

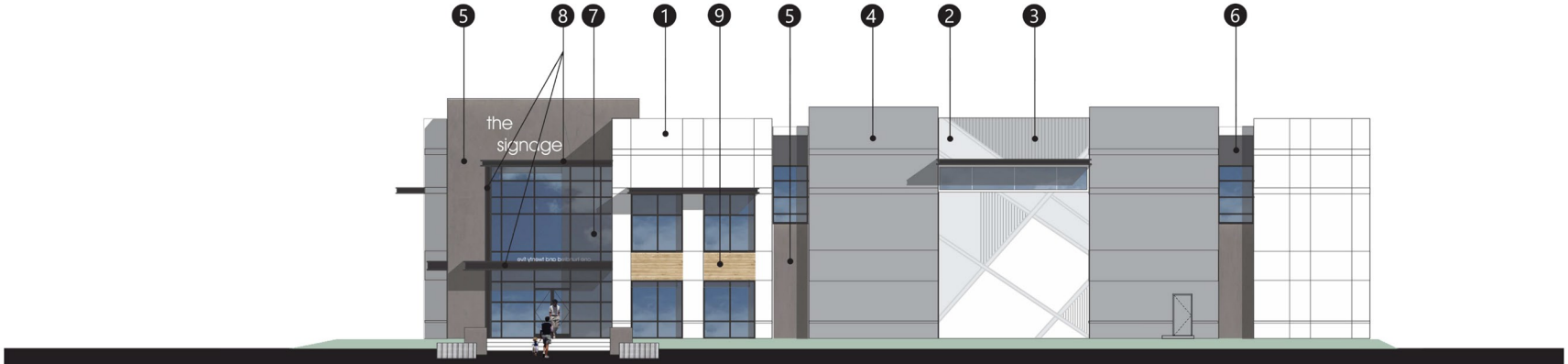
Figure 15

Not to Scale

Conceptual Architectural Elevations - Building 2



North Elevation



Old 215 Fontage Road - West Elevation

Source(s): HPA (03-18-2022)

Figure 16

Not to Scale

Conceptual Material Board

Source(s): HPA (03-18-2022)

Figure 17

Not to Scale

Conceptual Colored Elevations - Building 1

Source(s): HPA (03-18-2022)

Figure 18

Not to Scale

Conceptual Colored Elevations - Building 2

PLANTING LEGEND

TREES

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Cercidium 'Desert Museum' Blue Palo Verde	48" Box	6	L	Multi
	Chilopsis linearis Desert Willow	36" Box	2	L	Multi
	Chitalpa tashkentensis Chitalpa	24" Box	10	L	Standard
	Lagerstroemia i 'Muskogee' Crape Myrtle	24" Box	16	M	Multi
	Rhus lancea African Sumac	24" Box	59	L	Standard
	Tristania conferta Brisbane Box	15 Gal	37	M	Standard

SHRUBS

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	Callistemon 'Little John' Dwarf Bottle Brush	5 Gal	104	M	
	Ligustrum j. Texanum Texas Privet	5 Gal	410	M	
	Pennisetum orientale Oriental Fountain Grass	5 Gal	177	M	
	Salvia greggii Autumn Sage	5 Gal	352	M	

GROUNDCOVER

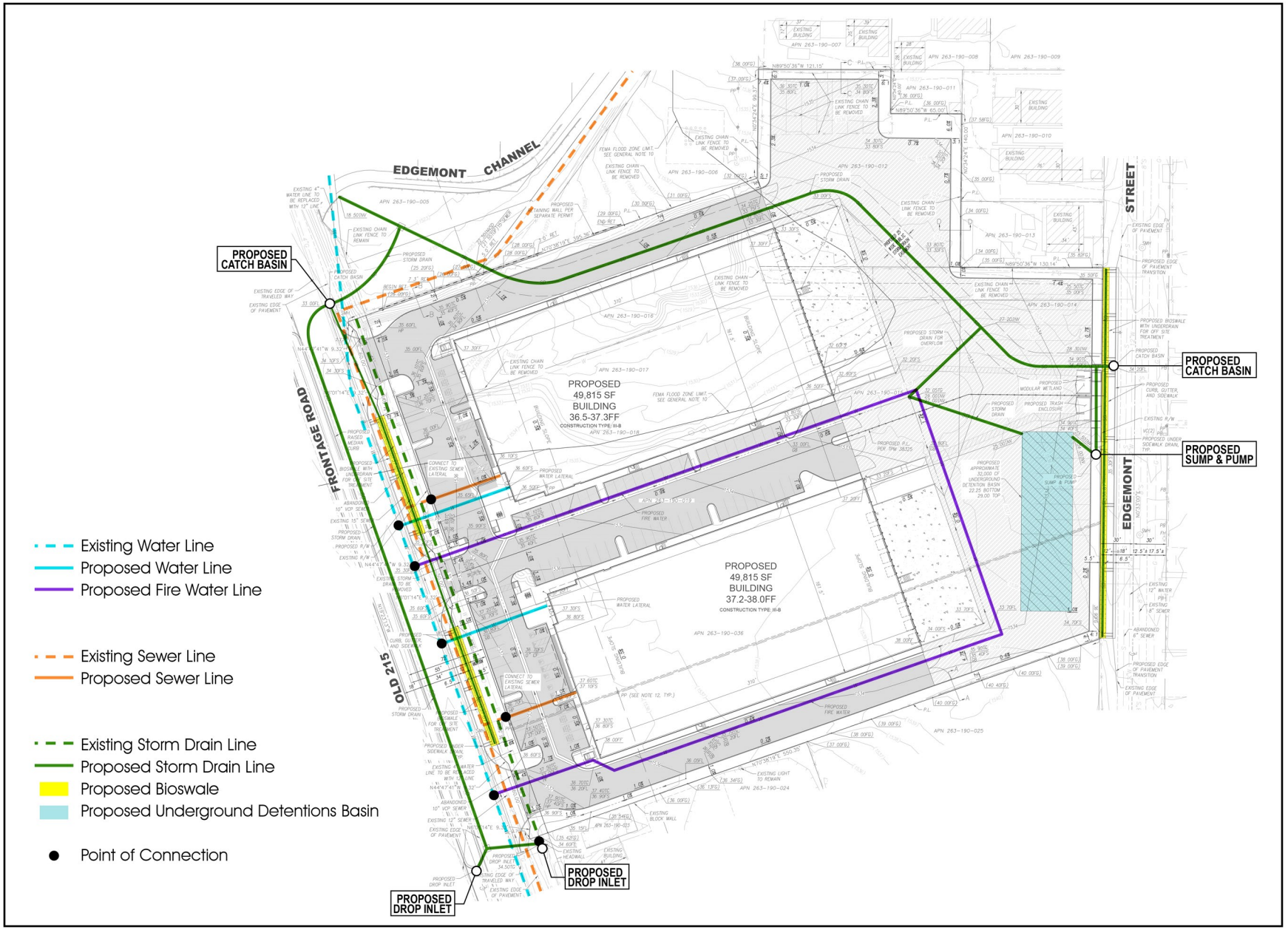
SYMBOL	BOTANICAL/COMMON NAME	SIZE	SPACING	WUCOLS	REMARKS
	Lonicera j. 'Halliana' Hall's Honeysuckle	1 Gal	48" O.C.	L	
	Rosa 'Flower Carpet' -Red Red Flower Carpet Rose	1 Gal	30" O.C.	L	
	Rosmarinus o. 'Huntington Carpet' Prostrate Rosemary	1 Gal	48" O.C.	L	
	Trachelospermum jasminoides Star Jasmine	1 Gal	24" O.C.	M	

Source(s): Hunter Landscape (03-18-2022)

Figure 19

Not to Scale

Conceptual Landscape Plan

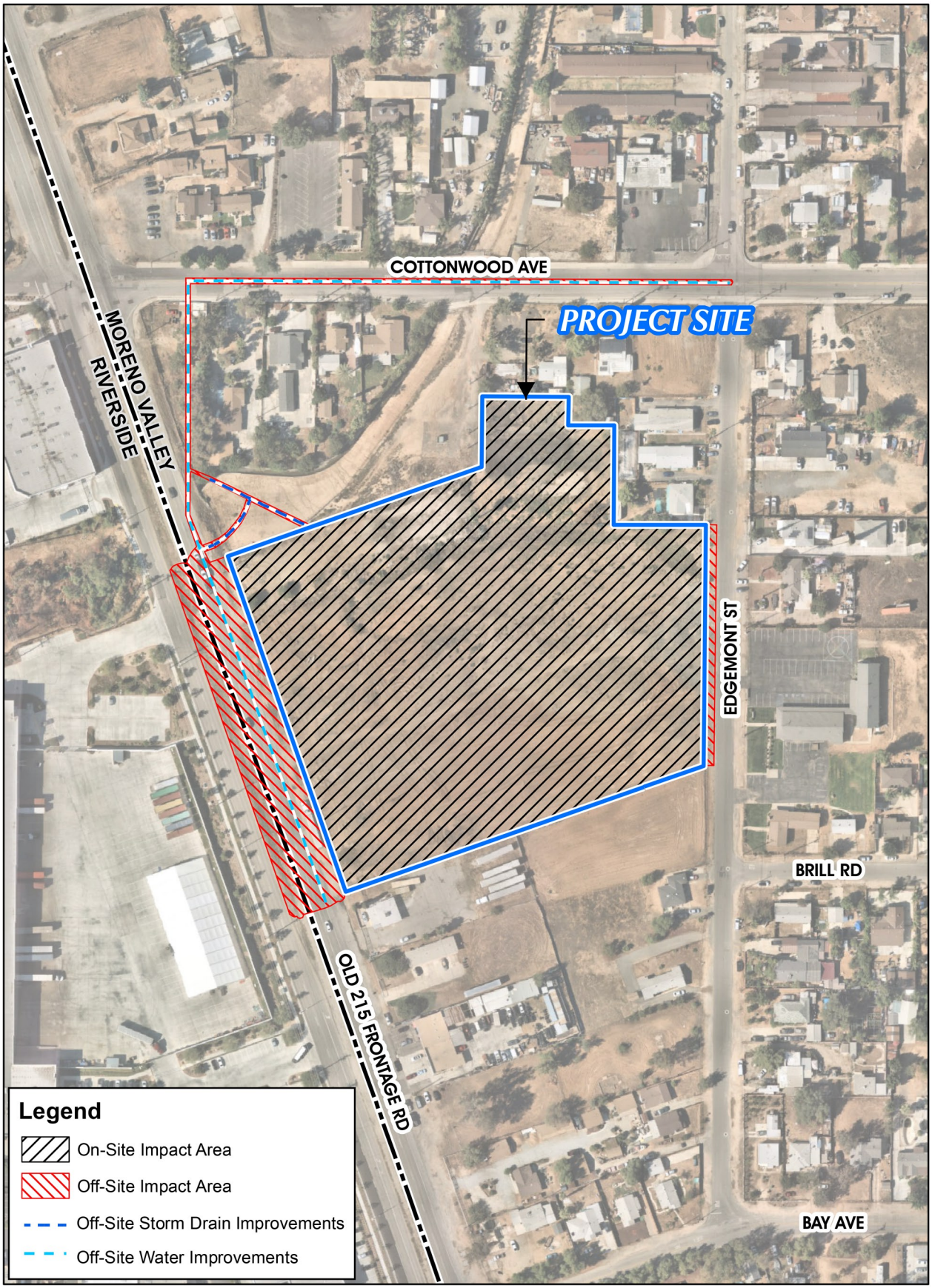


Source(s): CASC Engineering and Consulting (March 2022)

Figure 20

Not to Scale

Conceptual Utility Plan

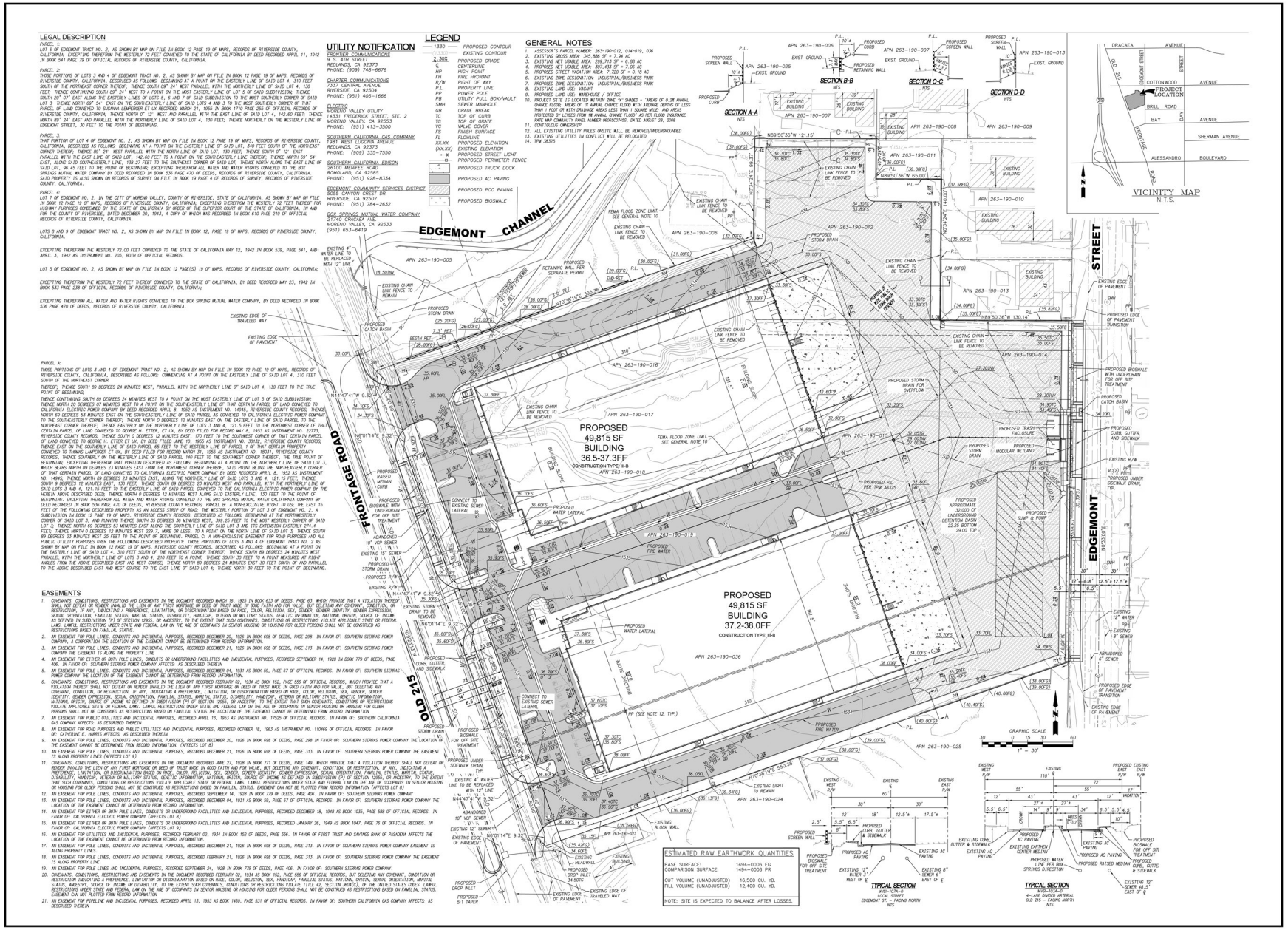


Source(s): ESRI, Nearmap Imagery (2022), RCTLMA (2022)

Figure 21

0 50 100 200 Feet

Project Physical Impact Footprint



Source(s): CASC Engineering and Consulting (06-30-2022)

Figure 22

Not to Scale

Conceptual Grading Plan

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

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

DETERMINATION (To be completed by the Lead Agency):

On the basis of this initial evaluation:

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

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

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

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

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

Signature _____ Date 2/8/2023

Julia Descoteaux
Printed Name

City of Moreno Valley
For

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

   a) Earlier Analyses Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

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

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

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

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

Response: According to the City's General Plan, scenic vistas are uninterrupted views of expanses of open land; scenic resources within the City of Moreno Valley are identified as Box Springs Mountains, Bernasconi Hills, Moreno Peak, the Badlands, San Jacinto Valley, Mystic Lake, San Bernardino Mountain, San Gabriel Mountain, and San Jacinto Mountains (City of Moreno Valley, 2021a, p. 10-10). According to General Plan Map ORSC-3, *Scenic Resources and Ridgelines*, the Project Site is not within or adjacent to a designated scenic resource or within a view corridor for any of the designated scenic resources in the City (City of Moreno Valley, 2021a, Map OSRC-3).

Due to intervening development and their distance and orientation in relation to the Project Site, prominent, distinct views of the Badlands, San Jacinto Valley, Mystic Lake, Moreno Peak, and Bernasconi Hills are not available from public viewing areas abutting the Project Site. Scenic resources visible (at least partially) from public viewing areas abutting the Project Site include Box Spring Mountains (2.4 miles north), San Bernardino Mountain (19 miles northeast), San Gabriel Mountain (26 miles northwest), and San Jacinto Mountain (35 miles southeast). Currently, views of the Box Springs Mountains to the north are partially obstructed from Old 215 Frontage Road and Edgemont Street by intervening development and off-site plant materials (i.e., trees). Distant views of the San Gabriel Mountain (looking northwest), San Bernardino Mountain, and San Jacinto Mountain (looking generally east) are provided from Old 215 Frontage Road; however, views to these landforms are obscured by intervening development, off-site plant materials and atmospheric haze. Distant views of the San Gabriel Mountain, San Bernardino Mountain, and San Jacinto Mountain are not provided from Edgemont Street due to intervening development and off-site plants. Currently, public viewing areas abutting the Project Site do not provide uninterrupted view of expanses of open land.

The Project would result in the construction of two approximately 41-foot-tall buildings and the installation of ornamental landscaping – including masses of trees along the subject property boundaries – on the Project Site. Due to the Project Site's orientation and the placement of the proposed buildings and landscaping, the Project is not anticipated to substantially obstruct or obscure views of Box Springs Mountain from Old 215 Frontage Road or Edgemont Street. Based on the foregoing analysis, the Project is not anticipated to result in a substantial adverse effect on a scenic vista. Impacts would be less than significant.

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

Response: The Project Site does not contain any scenic resources, including trees, rock outcroppings or historic buildings, and the Site is not within or adjacent to an officially designated State scenic highway corridor (Caltrans, 2022). Accordingly, no impact would occur.

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

Response: The Project Site is located within the Riverside-San Bernardino urban area, as defined by U.S. Census Bureau, and determined as part of the 2010 Census (USCB, 2022). Therefore, the Project would be considered to result in a significant adverse impact under this threshold only if the Project design would conflict with applicable zoning and other regulations governing scenic quality.

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

Implementation of the Project would result in the conversion of the Site from vacant, undeveloped land to developed land with two warehouse buildings with associated improvements including parking lots, drive aisles, utility infrastructure, ornamental landscaping, exterior lighting, and signage. The Project's design, including site layout, architecture, and landscaping is discussed and illustrated in detail in the *Project Description* this Initial Study. As previously described, the Project's architecture incorporates a neutral color palette that would not be visually offensive and also incorporates accent elements, such as colored glass and decorative building elements at the building's office entries for visual interest. Additionally, the Project's landscape plan incorporates low-water-need plant species that can maintain vibrancy during drought conditions. As a condition of approval, the Project Applicant would be required to maintain the proposed building, landscaping and improvements in a state of good repair. The proposed visual features of the Project would ensure a high-quality aesthetic for the site. As part of their standard discretionary permit review process, the City of Moreno Valley reviewed the Project's design proposal in detail and determined that no component of the Project would conflict with applicable design regulations within the City's Zoning and Development Code governing scenic quality. No impact would occur.

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

Response: Under existing conditions, the Project Site contains no sources of artificial lighting; however, street lights are present along Old 215 Frontage Road and outdoor light fixtures from the surrounding residential uses are present.

The Project would introduce new light sources to the Project Site as necessary for security, safety, and wayfinding. The Project's lighting elements would include building-mounted fixtures (security lighting and upward/downward facing decorative lighting oriented toward the building) and pole-mounted fixtures in the Project's truck docking areas and at the Project's driveway entries along Old 215 Frontage Road. The Project would be required to adhere to lighting requirements as set forth in the City of Moreno Valley Municipal Code Sections 9.10.110 and 9.16.280. The Municipal Code lighting standards govern the placement and design of outdoor lighting fixtures to ensure adequate lighting for public safety while also minimizing light pollution and glare and precluding public nuisances (e.g., blinking/flashing lights, unusually high intensity, or needlessly bright lighting). The City would confirm compliance with applicable lighting requirements during future review of building permit applications/plans. Mandatory compliance with the Municipal Code would ensure that the Project would not introduce any permanent design features that would adversely affect day or nighttime views in the area.

Glare is caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on intensity and direction of sunlight. Proposed exterior building materials primarily include concrete, painted metal, and tempered glass. While window glazing has a potential to result in minor glare effects, such effects would not adversely affect daytime views of surrounding properties, including motorists along adjacent roadways, because the glass proposed for the Project would be low-reflective and set back from the roadway at a distance and proposed landscaping would provide a buffer between all proposed glass surfaces and the public right of way.

For the reasons given above, implementation of the Project would not result in a significant source of light or glare that would adversely affect daytime or nighttime views. Accordingly, impacts would be less than significant.

Sources:

1. Moreno Valley General Plan 2040
   - Chapter 10 – Open Space and Resource Conservation
     - Map OSRC-3 –Scenic Resources and Ridgelines
2. California Department of Transportation (Caltrans) State Scenic Highway Map Viewer, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
3. United States Census Bureau (UCSB) 2010 Census Urban and Rural Classification and Urban Area Criteria, https://www.census.gov/programs-surveys/geography/guidance/geo-areas/urban-rural/2010-urban-rural.html 4. U.S. Census Bureau Urbanized Area Reference Maps, https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua75340_riverside--san_bernardino_ca/DC10UA75340.pdf 5. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code • Section 9.10.110 – Performance Standards, Light and Glare • Chapter 9.16 – Design Guidelines				
II. AGRICULTURE AND FOREST RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest protocols adopted by the California Air Resources Board. **Would the project:**				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
Response: According to the California Department of Conservation (CDC), the entire Project Site is classified as "Urban and Built-Up Land." (CDC, 2018) Additionally, under existing conditions, the Project Site is vacant and undeveloped; no agricultural production occurs on-site. Therefore, the implementation of the Project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur.				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
Response: The Project Site is zoned for an industrial land use (i.e., Business Park, BP) and is not zoned for an agricultural use (City of Moreno Valley, 2021b). Additionally, there are no lands abutting the Project Site that are zoned for an agricultural use (ibid.). Additionally, as disclosed in the City's General Plan EIR, there are no land within the City – inclusive of the Project Site – that are actively under a Williamson Act Contract (City of Moreno Valley, 2021c, Figure 4.2-1). Therefore, the Project would not conflict with existing zoning for agricultural use or Williamson Act Contract. No impact would occur.				
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
Response: The Project Site is not zoned as forest land, timberland, or Timberland Production, nor is it surrounded by forest land, timberland, or Timberland Production land (City of Moreno Valley, 2021b). Therefore, the Project has no potential to conflict with any areas currently zoned as forest, timberland, or Timberland Production and would not result in the rezoning of any such lands. As such, no impact would occur.				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

Response: The Project Site and surrounding areas contain urbanized uses and do not consist of forest land. Therefore, the Project would not result in the loss of forest land or result in the conversion of forest land to non-forest use. Accordingly, no impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Response: "Farmland" is defined in Section II (a) of Appendix G of the State CEQA Guidelines as "Prime Farmland," "Unique Farmland" or "Farmland of Statewide Importance" ("Farmland"). As disclosed above under Response II(a), the Project would not result in the conversion of Farmland to non-agricultural use.

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

Sources:

1. California Department of Conservation (CDC) California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/
2. Moreno Valley Zoning Map, https://www.moval.org/city_hall/general-plan2040/NewZoning.pdf
3. Final Environmental Impact Report City of Moreno Valley General Plan 2040
   - Section 4.2 – Agriculture and Forestry Resources

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

Response: The Project Site is within the South Coast Air Basin (SCAB or "Basin"). Currently, State, and federal air quality standards are exceeded in most parts of the SCAB. In response to local air quality conditions, the South Coast Air Quality Management District (SCAQMD) has adopted a series of Air Quality Management Plans (AQMPs) to meet the State and federal ambient air quality standards. AQMPs are regularly updated to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. The current AQMP, the *2016 AQMP*, was adopted by the SCAQMD in March 2017 and the Project's consistency with the *2016 AQMP* is discussed below. Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2, and Section 12.3 of the SCAQMD's *CEQA Air Quality Handbook* (1993). The Project's consistency with these criteria is discussed below.

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

Consistency Criterion No. 1 relates to violations of the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). As evaluated under Response III(b) the Project would not contribute air pollutant volumes to the SCAB that would contribute to or exacerbate existing air quality violations. Additionally, as evaluated under Response III(c), the Project would not generate localized criteria pollutant emissions increase the frequency or severity of existing air quality violations, cause or contribute to new violations, and/or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP. Accordingly, the Project is determined to be consistent with Consistency Criterion No. 1.

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

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

The growth forecasts used in the *2016 AQMP* to calculate future regional emissions levels are based on land use planning data provided by lead agencies via their general plan documentation. Development projects that increase the intensity of use on a specific property beyond the respective general plan's vision may result in increased stationary area source emissions and/or vehicle source emissions when compared to the *AQMP* assumptions. However, if a project does not exceed the growth projections in the applicable local general plan, then the project is considered to be consistent with the growth assumptions in the *AQMP*. The Project would be consistent with the City of Moreno Valley's General Plan land use designation for the subject property and, therefore, the Project would be consistent with the growth assumptions used in the *AQMP* and would not exceed the *AQMP's* long-term emissions projections.

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

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

Response: The Project has the potential to generate air pollution during both construction activities and long-term operation. An *Air Quality Impact Analysis* (AQIA) was prepared by Urban Crossroads, Inc. (Urban Crossroads) to evaluate potential criteria pollutant emissions that would result from implementation of the Project. The Project's AQIA is included as *Technical Appendix A1* to this Initial Study. For a detailed description of the health effects of air pollutants refer to Section 2.4 of the AQIA. In general, air pollutants have adverse effects to human health including, but not limited to, respiratory illness and carcinogenic effects; however, based on available modeling it is not feasible to correlate regional criteria pollutant emissions from development projects of the scale of the proposed Project to adverse health effects on a SCAB-wide level (Urban Crossroads, 2022a, pp. 11-17, 58-59). The potential for the Project to result in substantial adverse health effects from toxic air contaminant emissions is addressed in Response III(c).

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

Project Construction Impact Analysis

For purposes of the construction emissions analysis, construction was conservatively expected to occur between February 2023 and October 2023. The California Emissions Estimator Model (CalEEMod) accounts for the implementation and enforcement of California's progressively more restrictive regulatory requirements for construction equipment and the ongoing replacement of older construction fleet equipment with newer, less- polluting equipment. According to the CalEEMod, construction activities that occur in the near future are expected to generate more air pollutant emissions than the same activities that may occur farther into the future. Thus, in the event that the Project's construction period occurs later than expected by this analysis, Project-related construction emissions would not exceed the values presented herein (Urban Crossroads, 2022a, p. 40). The Project's construction characteristics and construction equipment fleet assumptions were previously described in the Project Description to this Initial Study.

The calculated maximum daily emissions associated with Project construction are presented in Table 3, *Peak Construction Emissions*. Detailed construction model outputs are presented in Appendix 3.1 of the Project's AQIA.

Table 3 Peak Construction Emissions

Year	Emissions (lbs/day) [1]					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
2023	52.43	51.38	36.30	0.11	7.65	3.66
Winter						
2023	52.42	51.74	36.22	0.11	7.65	3.66
Maximum Daily Emissions	**52.43**	**51.74**	**36.30**	**0.11**	**7.65**	**3.66**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2022a, Table 3-5)

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

Project Operational Impact Analysis

Operation of the Project is expected to generate air pollutant emissions from the operation of motor vehicles (including trucks), operation of on-Site equipment, on-Site maintenance activities, and the consumption of energy resources. The calculated operational-source emissions from the Project are summarized on Table 4, *Peak Operational Emissions*. Detailed operational model outputs are presented in Appendix 3.2 of the Project's AQIA.

Table 4 Peak Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Area Source	2.32	4.70E-04	0.05	0.00	1.90E-04	1.90E-04
Energy Source	0.10	0.92	0.77	5.50E-03	0.07	0.07
Mobile Source	1.69	4.35	18.71	0.06	4.82	1.33
TRU Source	0.04	0.49	0.61	1.17E-04	0.01	0.01
On-Site Equipment Source	0.22	2.07	1.50	6.33E-03	0.08	0.07
Total Maximum Daily Emissions	**4.38**	**7.83**	**21.65**	**0.07**	**4.97**	**1.47**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Winter						
Area Source	2.32	4.70E-04	0.05	0.00	1.90E-04	1.90E-04
Energy Source	0.10	0.92	0.77	5.50E-03	0.07	0.07
Mobile Source	1.47	4.61	16.36	0.05	4.82	1.33
TRU Source	0.04	0.49	0.61	1.17E-04	0.01	0.01
On-Site Equipment Source	0.22	2.07	1.50	6.33E-03	0.08	0.07
Total Maximum Daily Emissions	**4.16**	**8.09**	**19.30**	**0.06**	**4.97**	**1.47**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2022a, Table 3-8)

As summarized in Table 4, Project operational emissions of VOCs, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ would not exceed SCAQMD regional criteria thresholds. Accordingly, the Project would not emit substantial

concentrations of these pollutants during long-term operation and would not contribute to an existing or projected air quality violation. The Project's long-term emissions of VOCs, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ would be less than significant.

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

Response: The area immediately surrounding the Project Site contains a variety of uses, including vacant parcels and parcels developed with industrial, transitional, and legal non-conforming residential uses. Being located near the I-215 corridor and within the overflight corridor of the March Air Reserve Base, the census tract containing the Project Site is in the 99th percentile for pollution burden which, based on the census tract's demographic characteristics, results in the Office of Environmental Health Hazard Assessment (OEHHA) ranking the area within the 95th percentile of communities that are disproportionately burdened by multiple sources of pollution (OEHHA, 2022). Although the City of Moreno Valley General Plan designates the Project Site and areas between I-215 Frontage Road and Day Street (approximately 0.25-mile east of the Project Site) for industrial uses, there are numerous legal non-conforming residential homes in this area.

Notwithstanding the information above, the SCAQMD models and characterizes localized health risks from air pollution exposure via their *Multiple Air Toxics Exposure Study (MATES)*, which is in its fifth edition (i.e., *MATES V*). *MATES-V* extrapolates the excess cancer risk levels throughout the SCAB using mathematical modeling for specific geographic grids. MATES-V estimates an excess carcinogenic risk of approximately 367 in one million for the Project area, placing the Project area within the 70th percentile for cancer risk within the SCAB (SCAQMD, 2021). For comparison, the prior version of SCAQMD's MATES analysis, *MATES-IV*, estimated the Project area was in the 89th percentile for cancer risk with an excess cancer risk of 652 in one million (ibid.).

The following provides an analysis of the Project's potential to expose sensitive receptors in the immediate vicinity of the Project Site to substantial pollutant concentrations during Project construction and long-term operation. The following analysis is based on analyses contained in the Project's AQIA and *Mobile Source Health Risk Assessment* (HRA, provided as *Technical Appendix A2* to this Initial Study), and utilizes applicable significance thresholds established by the SCAQMD to draw a conclusion of the significance of Project-related impacts.

Localized Emissions Analysis

Table 5, *Peak Localized Construction Source Emissions*, presents the localized impacts at the sensitive receptor locations in the vicinity of the Project Site with highest exposure to Project construction activities. Detailed construction model outputs are presented in Appendix 3.1 of the Project's AQIA. Localized Project construction emissions would not exceed the applicable SCAQMD thresholds for any criteria pollutant.

Table 5 Peak Localized Construction Source Emissions

Construction Activity	Year	Emissions (lbs/day)			
		NO_X	CO	PM_{10}	$PM_{2.5}$
Site Preparation	2022	2.40	3.62	0.52	0.14
	Maximum Daily Emissions	**2.40**	**3.62**	**0.52**	**0.14**
	SCAQMD Localized Threshold	118	602	4	3
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**
Grading	2022	45.36	33.97	6.32	3.25
	Maximum Daily Emissions	**45.36**	**33.97**	**6.32**	**3.25**
	SCAQMD Localized Threshold	270	1,577	13	8
	Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2022a, Table 3-11)

Table 6, *Peak Localized Operational Source Emissions*, presents the localized impacts at the sensitive receptor locations in the vicinity of the Project Site with highest exposure to Project construction activities. Detailed construction model outputs are presented in Appendix 3.2 of the Project's AQIA. Localized

operational emissions from Project would not exceed the applicable SCAQMD thresholds for any criteria pollutant.

Table 6 Peak Operational Source Emissions

Scenario	Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Summer	3.23	3.29	0.39	0.21
Winter	3.24	3.17	0.39	0.21
Maximum Daily Emissions	**3.24**	**3.29**	**0.39**	**0.21**
SCAQMD Localized Threshold	270	1,577	4	2
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**

Source: (Urban Crossroads, 2022a, Table 3-13)

Based on the data presented in Table 5 and Table 6, the Project would not result in substantial localized pollutant concentrations during either construction or operation. Impacts would be less than significant.

Impact Analysis for CO "Hot Spots"

A CO "hot spot" is an isolated geographic area where localized concentrations of CO exceeds the CAAQS one-hour (20 parts per million) or eight-hour (9 parts per million) standards. A Project-specific CO "hot spot" analysis was not performed because CO attainment in the SCAB was thoroughly analyzed as part of SCAQMD's *2003 AQMP* and the *1992 Federal Attainment for Carbon Monoxide Plan* (1992 CO Plan) (Urban Crossroads, 2022a, pp. 54-55). The SCAQMD's *2003 AQMP* and the *1992 CO Plan* found that peak CO concentrations in the SCAB were the byproduct of unusual meteorological and topographical conditions and were not the result of traffic congestion. For context, the CO "hot spot" analysis performed for the *2003 AQMP* recorded a CO concentration of 9.3 parts per million (8-hour) at the Long Beach Boulevard/Imperial Highway intersection in Los Angeles County; however, only a small portion of the recorded CO concentrations (0.7 parts per million) were attributable to traffic congestion at the intersection. The vast majority of the recorded CO concentrations at the Long Beach Boulevard/Imperial Highway intersection (8.6 parts per million) were attributable to unique local meteorological conditions that resulted in elevated ambient air concentrations. In comparison, the busiest intersections in the Project Site vicinity would neither experience peak congestion levels or ambient CO concentrations comparable to the conditions observed at the Long Beach Boulevard/Imperial Highway intersection nor feature atypical meteorological conditions. Further, data from air districts in the State indicate that under existing and future vehicle emission rates, an individual development project would have to increase traffic volumes at a single intersection by between 24,000 and 44,000 vehicles per hour in order to generate a significant CO impact. The Project would not produce the volume of traffic required to generate a CO hotspot based on the referenced studies. Based on the relatively low local traffic congestion levels, low existing ambient CO concentrations, and the lack of any unusual meteorological and/or topographical conditions in the Project Site vicinity, the Project is not expected to cause or contribute to a CO "hot spot" (Urban Crossroads, 2022a, pp. 55-56). Impacts would be less than significant.

Diesel Particulate Emissions Analysis

This section evaluates the potential health risk impacts to sensitive receptors and adjacent workers associated with the development of the proposed Project, more specifically, health risk impacts as a result of exposure to Toxic Air Contaminants (TACs) including diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the Project Site. Detailed air dispersion model outputs and risk calculations are presented in Appendices 2.1 through 2.4 of the Project's HRA Analysis.

Project Construction Analysis

The land use with the greatest potential exposure to Project construction DPM source emissions (i.e., maximally exposed individual receptor, MEIR) is located approximately 19 feet east of the Project Site at an existing residence located at 13571 Edgemont Street. At the MEIR, the maximum incremental cancer risk attributable to Project construction DPM source emissions is estimated at 8.15 in one million, which is less than the SCAQMD's significance threshold of 10 in one million (Urban Crossroads, 2023a, p. 1). At this same location, non-cancer risks were estimated to be 0.03, which would not exceed the applicable

threshold of 1.0 (ibid.). All other receptors in the vicinity of the Project Site would experience less risk than what is identified for the MEIR. As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity.

Project Operation Analysis
The residential land use with the greatest potential exposure to Project operation DPM source emissions (MEIR) is located approximately 19 feet east of the Project Site at an existing residence located at 13561 Edgemont Street. At the MEIR, the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 1.63 in one million, which is less than the SCAQMD's significance threshold of 10 in one million (Urban Crossroads, 2023a, p. 1). At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0 (ibid.). All other residential receptors in the vicinity of the Project Site would experience less risk than what is identified for the MEIR. Accordingly, long-term operation of the Project would not directly cause or contribute in a cumulatively-considerable manner to the exposure of residential receptors to substantial DPM emissions. Therefore, the Project would result in a less-than-significant impact.

The worker receptor land use with the greatest potential exposure to Project DPM source emissions (maximally exposed individual worker, MEIW) is an existing church located approximately 107 feet east of the Project Site. At the MEIW, the maximum incremental cancer risk impact is 0.09 in one million which is less than the SCAQMD's threshold of 10 in one million (Urban Crossroads, 2023a, p. 2). Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0 (ibid.). All other worker receptors in the vicinity of the Project Site would experience less risk than what is identified for the MEIW. Accordingly, long-term operation of the Project would not directly cause or contribute in a cumulatively-considerable manner to the exposure of worker receptors to substantial DPM emissions. Therefore, the Project would result in a less-than-significant impact.

There are no schools located within 1,320 feet of the Project Site, which is the location with the highest concentrations of Project-related DPM emissions – due to trucks idling on the Site. Proximity to sources of toxics is critical to determining the impact. Based on California Air Resources Board and SCAQMD emissions and modeling analyses, particulate matter pollutant concentrations drop by 70 percent at a distance of 500 feet and by 80 percent at 1,000 feet from the emissions source (Urban Crossroads, 2022a, p. 2). Because there are no schools located within at least 0.25-mile of the Project Site, operations at the Project Site would not expose any school child receptors to substantial concentrations of diesel particulate matter emissions (ibid.). Impacts related to operations on the Project Site would be less than significant. The nearest school campus to the Project Site is Towngate Elementary School, which is located approximately 3,900 feet northeast of the Site. Heavy trucks traveling to/from the Project Site would not utilize City streets that abut the Towngate Elementary School (or any other school within the City). Accordingly, off-site trucking activity related to Project operations would not expose any school child receptors to substantial concentrations of diesel particulate matter emissions. This impact is less than significant.

The land use with the greatest potential increased cancer risk due to exposure to Project construction-source and operational-source DPM emissions is located at 13571 Edgemont Street. At this location, the maximum incremental cancer risk attributable to Project construction and operational DPM source emissions is estimated at 8.88 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be 0.03, which would not exceed the applicable threshold of 1.0. As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity. (Urban Crossroads, 2022a, p. 3)

Conclusion
For the reasons explained under this Response, the Project would not expose sensitive receptors to substantial pollutant concentrations. 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
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

Response: The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the Project may result from construction equipment exhaust and the application of concrete and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the Project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations. The Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, the Project would not result in other emissions that would adversely affect a substantial number of people and impacts would be less than significant.

Sources:

1. Urban Crossroads, 2022a, *Cottonwood & Edgemont Warehouse Air Quality Impact Analysis*. (Technical Appendix A1)
2. Urban Crossroads, 2023, *Cottonwood & Edgemont Warehouse Mobile Source Health Risk Assessment*. (Technical Appendix A2)
3. Office of Environmental Health Hazard Assessment (OEHHA), 2022, CalEnviroScreen 4.0 [software program]. Available online at https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40
4. South Coast Air Quality Management District, 2021. MATES Interactive Data Display [software program]. Available online at https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23?views=Navigate-the-map

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

Response: A *General Biological Resources Assessment* (*Technical Appendix B*) was prepared for the Project by Alden Environmental, Inc. (Alden), which addresses potential impacts to candidate, sensitive, or special status species due to implementation of the Project. The analysis presented below is based on the findings of the *General Biological Assessment* report. The Project's off-site improvement area (i.e., the areas where proposed upsized public water lines and public storm drain improvements would be constructed) is disturbed and developed and devoid of natural habitat features.

Special Status Plant Species

The Project Site (including both on-site and off-site components) is approximately 8.3 acres and supports 6.5 acres of non-native grassland, 0.08 acre of disturbed habitat and 1.7 acres of developed land. The Project Site is dominated by non-native grasslands including the red brome (*Bromus madritensis*), hare barley (*Hordeum murinum)*, and wild oat (*Avena fatua*). The non-native grassland also supports some native and non-native annual plant species such as fiddleneck (*Amsinckia sp*.), red maids (*Calandrinia ciliata*), and shortpod mustard (*Hirschfeldia incana*). (Alden, 2022, p. 4)

Disturbed habitat typically includes land cleared of vegetation (e.g., dirt roads), land containing a preponderance of non-native plant species such as ornamentals or ruderal exotic species that take advantage of disturbance (previously cleared or abandoned landscaping), or land showing signs of past

or present animal usage that removes any capability of providing viable habitat. Disturbed habitat occurs adjacent to the existing Edgemont Channel within an area kept cleared of vegetation. (Alden, 2022, p. 4)

Areas with asphalt and concrete are considered developed, although some patches of non-native grasses and some ornamental plantings occur there. Developed also includes the area behind the homes where the existing 4-inch water lines would be upsized to 12-inch lines. And, developed occurs as Old 215 Frontage Road. (Alden, 2022, p. 4)

The Project Site does not support sensitive vegetation and no sensitive vegetation communities were observed during Alden's field survey. (Alden, 2022, p. 4) The Project Site is not within a Narrow Endemic Plant Special Survey Area (NEPSSA) or Criteria Area Plant Special Survey Area (CASSA). Moreover, the California Natural Diversity Database (CNDDB) and United States Fish and Wildlife Service (USFWS) database queries did not return any records of sensitive plant species on or adjacent to the Project Site (Alden, 2022, p. 5). Accordingly, development of the Project would result in no impact to special-status plant species.

Special Status Wildlife Species

No sensitive animal species were observed or detected on the Project Site. Additionally, CNDDB and USFWS database queries did not return any records of sensitive animal species on or adjacent to the Project Site. The Project Site is not within the burrowing owl survey area; therefore, a burrowing owl survey was not required. (Alden, 2022, p. 5)

Conclusion

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

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

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

Mitigation

MM BR-1 As a condition of approval for all grading permits, vegetation clearing and ground disturbance shall be prohibited during the migratory bird nesting season (February 1 through September 15), unless a migratory bird nesting survey is completed in accordance with the following requirements:

a. A migratory nesting bird survey of the project's impact footprint shall be conducted by a qualified biologist within (3) days prior to initiating vegetation clearing or ground disturbance.

b. A copy of the migratory nesting bird survey results report shall be provided to the City of Moreno Valley Planning Division. If the survey identifies the presence of active nests, then the qualified biologist shall provide the City of Moreno Valley Planning Division with a copy of maps showing the location of all nests and an appropriate buffer zone around each nest sufficient to protect the nest from direct and indirect impact. The size and location of all buffer zones, if required, shall be subject to review and approval by the City of Moreno Valley Planning Division and shall be no less than a 300-foot radius around the nest for non-raptors and a 500-foot radius around the nest for raptors. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
clearing or ground disturbance shall commence until the qualified biologist and City Planning Division verify that the nests are no longer occupied and the juvenile birds can survive independently from the nests.				
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?	☐	☐	☒	☐
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: There are no wetland/riparian communities located on the Project Site. The Project Site is relatively flat and does not support any aquatic features necessary for the development of these habitats. Additionally, the National Hydrography Dataset and National Wetlands Inventory do not show any wetland/riparian resources on the Project Site. (Alden, 2022, p. 5) Accordingly, implementation of the Project would not impact wetland/riparian habitat or other sensitive natural community.				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with an established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
Response: Wildlife movement corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbances. Generally, mountain canyons and/or riparian corridors are used by wildlife as corridors; the Project Site does not contain either of these features. Furthermore, the Project Site is surrounded by human activity in the form of industrial and residential land uses and roadways. Therefore, no impact to a wildlife corridor would occur from implementation of the Project. Wildlife nurseries are sites where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas, and bat colonies. Although no nesting birds or remnant nests were observed on the Project Site by Alden, implementation of the Project could potentially result in significant impacts to biological resources (i.e., avian species and their nests) that are protected by State and federal regulations, if active nests are present within or adjacent to the site during construction. Implementation of MM BR-1 would reduce potential impacts to nesting birds to less-than-significant levels by ensuring that pre-construction surveys are conducted to determine the presence or absence of nesting birds on or adjacent to the Project Site prior to the commencement of construction activities. If active nests are discovered, this mitigation measure establishes performance criteria that requires avoidance of the nests until it can be determined the nest is no longer active or that the juveniles from the occupied nests can survive independently of the nest.				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
Response: Implementation of the Project would result in the removal of trees on the Project Site. The removal of trees is regulated by City of Moreno Valley Municipal Code Chapter 9.17.030, which requires development projects to conduct a tree survey prior to construction and, if any mature significant trees are to be removed, to replace each removed tree at defined ratios (as specified in Municipal Code Chapter 9.17.030). Prior to removal of any trees from the Project survey area, the Project Applicant would be required to comply with the provisions of Chapter 9.17.030 of the City of Moreno Valley Municipal Code. Mandatory compliance with the requirements of the Municipal Code would ensure the Project would not conflict with the City of Moreno Valley's ordinance regulating tree removal.				

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

In addition, the City of Moreno Valley Municipal Code contains provisions for the protection of the Stephens' Kangaroo Rat (refer to Title 8, Chapter 8.60 of the Municipal Code). The CNDDB and USFWS database queries did not return any records of sensitive animal species on or adjacent to the Project Site. Accordingly, the Project is exempt from the focused survey requirements for the Stephens' Kangaroo Rat established by the City's Municipal Code. The Project Applicant is required by the Municipal Code to contribute a local development impact and mitigation fee, which requires a fee payment to assist the City in implementing the habitat conservation plan for the Stephens' Kangaroo Rat. With mandatory compliance with standard regulatory requirements (i.e., development impact and mitigation fee payment), the proposed Project would not conflict with any City policies or ordinances related to the protection of the Stephens' Kangaroo Rat. (The Project's consistency with applicable provisions of the Stephens' Kangaroo Rat Habitat Conservation Plan (HCP) are addressed in Response IV(f).)

The City of Moreno Valley Municipal Code also contains provisions for the collection of mitigation fees to further the implementation of the Western Riverside County MSHCP (refer to Title 3, Chapter 3.48 of the Municipal Code). The Project Applicant is required by the Municipal Code to contribute a local mitigation fee, which requires a fee payment to assist the City in implementing the Western Riverside County MSHCP reserve system (including the acquisition, management, and long-term maintenance of sensitive habitat areas). With mandatory compliance with standard regulatory requirements (i.e., mitigation fee payment), the proposed Project would not conflict with any City policies or ordinances related to the mitigation fee program associated with Western Riverside County MSHCP. (The Project's consistency with applicable provisions of the MSHCP are addressed in Response IV(f).)

The City of Moreno Valley does not have any additional policies or ordinances in place to protect biological resources that are applicable to the Project. Mandatory compliance with the above referenced Moreno Valley Municipal Code Chapters would ensure that implementation of the Project would result in a less-than-significant impact associated with local policies and ordinances.

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

Response: The Project Site is located within the boundaries of the Reche Canyon/Badlands Area Plan but is not within or adjacent to any Criteria Cells. Required species survey areas for the Project Site were identified using the MSHCP Survey Areas

Riparian/Riverine and Vernal Pool Requirements
The Project Site does not contain wetland/riparian features, or vernal pools on or adjacent to the Project Site regulated by the MSHCP; therefore, the Project would not conflict with Section 6.1.2, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*. (Alden, 2022, p. 6)

Sensitive Plant Species
The Project Site is not within the NEPSSA or CASSA; therefore, the NEPSSA requirements are not applicable to the Project and the Project is consistent with the Western Riverside County MSHCP narrow endemic plant species policies. (Alden, 2022, p. 5)

Urban/Wildlands Interface Guidelines
The Project Site is not adjacent to any MSHCP conservation area. Consequently, the Urban/Wildlife Interface Guidelines do not apply to the Project. (Alden, 2022, p. 6)

Burrowing Owl
The Project Site is not within the MSHCP burrowing owl survey area; therefore, a burrowing owl survey is not required.

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

MSHCP and Reserve Assembly Criteria

The Project Site is not located within any Criteria Cells, nor is it identified for potential use for the MSHCP Reserve Assembly. Therefore, the Project will not conflict with MSHCP conservation objectives for the area.

Sources:

1. Alden Environmental, Inc., 2022, *General Biological Assessment for the Cottonwood and Edgemont Project*. (Technical Appendix B)
2. Moreno Valley Municipal Code Chapter 3.48 – Western Riverside County Multiple Species Habitat Conservation Plan Fee Program
3. Moreno Valley Municipal Code Chapter 8.60 – Threatened and Endangered Species
4. Moreno Valley Municipal Code Section 14.40.040 – Public Tree Care
5. Moreno Valley Municipal Code Section 9.17.030 – Landscape Ordinance

V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒	☐	☐

Response: The *Cultural Resources Assessment* (see *Technical Appendix C*) prepared for the Project by Brian F. Smith and Associates (BFSA), which included a comprehensive site survey and archival records search, identified no historical resources on the Project Site (BFSA, 2022a, p. 5.0-2). The potential for buried or masked cultural deposits within the Project Site is considered low to moderate based upon the lack of identified resources on the Project Site and previous impacts to the property (BFSA, 2022a, p. 5.0-5). Notwithstanding, because the Project Site contained multiple structures no later than 1948 (which were later demolished in approximately 1994), BFSA indicated there was the potential for buried historical deposits to be present on the Project Site (ibid.). The potential for Project implementation to directly or indirectly destroy unknown, significant historical resources that may be buried or masked on the Project Site is a significant impact and mitigation is required. The Project's off-site improvement area is disturbed and developed under existing conditions (i.e., cleared, graded, plowed, and/or paved), with no potential to contain historic resources.

MM CR-1 and MM CR-3 through MM CR-9 would ensure the proper identification and subsequent treatment of any significant historical resources that may be encountered during ground-disturbing activities associated with Project construction. With implementation of the required mitigation, the Project's potential impacts to significant historical resources would be reduced to less-than-significant.

Mitigation

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

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

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

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

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

i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place they were found with no development affecting the integrity of the resources.
ii. 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 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 Mitigation Measure CR-3 The location for the future reburial area shall be identified on a confidential exhibit on file with the City, and concurred to by the Consulting Native American Tribal Governments prior to certification of the environmental document.

MM CR-5 The City shall verify that the following note is included on the Grading Plan:

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

MM CR-6 If potential historic or cultural resources are uncovered during excavation or construction activities at the project site that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, all ground disturbing activities in the affected area within 100 feet of the uncovered resource must cease immediately and a qualified person meeting the Secretary of the Interior's standards (36 CFR 61), Tribal 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. Further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional archeologist and Tribal Monitors, if needed. 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

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

Native American Tribes as defined in CR-3 before any further work commences in the affected area. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.

MM CR-7 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).

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

MM CR-9 Prior to final inspection, the developer/permit holder shall prompt the Project Archeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside (UCR) and one (1) copy shall be submitted to the Consulting Tribe(s) Cultural Resources Department(s).

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

Response: BFSA did not identify any archaeological resources on the Project Site during a pedestrian survey (BFSA, 2022a, p. 5.0-2). Given the relatively gentle slope, valley setting, and lack of exposed bedrock outcrops for the Project, predictive modeling would suggest that if prehistoric archaeological sites are present within the Project area, they will likely be artifact scatters or specialized resource processing loci that would have developed as a result of prehistoric resource extraction practices (ibid.). The records search performed by BFSA also did not identify any archaeological resources that had been previously recorded on or abutting the Project Site. Due to the extensive nature of past ground disturbances on the Project Site, the likelihood of discovering archaeological resources on the Site is considered low (ibid.). Notwithstanding the preceding analysis, there is a possibility that archaeological resources may be present beneath the Project Site's subsurface and may be impacted by ground-disturbing activities associated with Project construction. If any archaeological resources are unearthed on the Project Site during construction that meet the definition of an archaeological resource cited in CEQA Guidelines Section 15064.5 and are disturbed/damaged by Project construction activities, impacts to archaeological resources would be significant.

MM CR-1 and MM CR-3 through MM CR-9 would ensure the proper identification and subsequent treatment of any significant prehistoric archaeological resources that may be encountered during ground-disturbing activities associated with Project construction. With implementation of the required mitigation, the Project's potential impacts to significant prehistoric archaeological resources would be reduced to less-than-significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
The Project's off-site improvement area is disturbed and developed under existing conditions with no potential to contain prehistoric archaeological resources.				
c) Disturb any human remains, including those interred outside of formally dedicated cemeteries?	☐	☐	☒	☐

Response: The Project Site does not serve as a cemetery and no known formal cemeteries are within the immediate site vicinity (one-mile radius) (BFSA, 2022a, pp. 5.0-1 and 2). Nevertheless, the remote potential exists that human remains may be unearthed during grading and excavation activities associated with the Project's construction. The Project's off-site improvement area is developed under existing conditions (i.e., cleared, graded, and/or paved) with no potential to contain human remains. The Project's off-site improvement area is disturbed and developed under existing conditions with no potential to contain human remains.

If human remains are unearthed during construction activities at the Project Site, the construction contractor would be required by law to comply with California Health and Safety Code Section 7050.5 "Disturbance of Human Remains." According to Section 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) by telephone within 24 hours. Pursuant to California Public Resources Code Section 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code Section 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials.

With mandatory compliance to California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, any potential impact to human remains, including human remains of Native American ancestry, that may result from development of the Project Site would be less than significant.

Sources:

1. Brian F. Smith and Associates (BFSA), *Phase I Cultural Resources Survey of the Cottonwood & Edgemont Project*. (Technical Appendix C) [Note: the Confidential Appendix for this document cannot be provided to the public due to the inclusion of confidential information pursuant to Government Code Section 6254.10.)
2. California Health Code Section 7050.5 – Dead Bodies
3. Public Resources Code Section 5097.94(k) – Powers and Duties
4. Public Resources Code Section 5097.98 – Native American Historical, Cultural, and Sacred Sites

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

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

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

Energy Use During Construction

The Project's construction process would consume electricity and fuel. Project-related construction activities would represent a "single-event" demand and would not require on-going or permanent commitment of energy resources. Project construction is estimated to consume approximately 54,749 kilowatt hours (kWh) of electricity, approximately 22,598 gallons of diesel fuel from operation of construction equipment, 7,769 gallons of diesel fuel from construction vendor trips, and 9,741 gallons of fuel from construction worker trips (Urban Crossroads, 2022b, p. 31). The amount of energy and fuel use anticipated by the Project's construction activities are typical for the type of scale of construction proposed by the Project and there are no aspects of the Project's proposed construction process that are unusual or energy-intensive (Urban Crossroads, 2022b, p. 32). Furthermore, construction equipment would be required to conform to the applicable State regulations and CARB emissions standards, acting to minimize energy usage and promote equipment fuel efficiencies. For example, California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. As supported by the preceding discussion, the Project's construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Energy Use Project Operations

Project-related traffic would consume approximately 78,710 gallons of fuel per year (Urban Crossroads, 2022b, p. 32). The number of daily trips and miles traveled by Project traffic are consistent with other industrial uses of similar scale and configuration in the Inland Empire (ibid.). That is, the Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and/or vehicle miles traveled, nor associated excess and wasteful vehicle energy consumption. Enhanced fuel economies realized pursuant to federal and State regulatory actions, and related transition of passenger vehicles to alternative energy sources (e.g., electricity, natural gas, bio fuels, hydrogen cells) would likely decrease future Project-related gasoline fuel demands per mile traveled below the level disclosed herein. The location of the Project Site proximate to regional and local arterial roadways (for example, I-215) is expected to minimize the Project vehicle miles traveled within the region. Based on the foregoing, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Building operations and site maintenance activities associated with the Project would result in the consumption of natural gas and electricity. Natural gas would be supplied to the Project by Southern California Gas Company; electricity would be supplied to the Project by Moreno Valley Utility (MVU). Energy demands from Project operations are estimated at 3,414,316 kilo-British thermal units (kBTU) per year of natural gas and 1,298,765 kWh per year of electricity (Urban Crossroads, 2022b, p. 33). The Project would utilize energy efficient/energy conserving designs and operational programs as required by State and local building codes, such as Title 24. Uses proposed by the Project are not inherently energy intensive, and Project energy demands in total would be comparable to, or less than, other industrial projects of similar scale and configuration (ibid.). Based on the foregoing analysis, the Project's operational energy demand would not be considered inefficient, wasteful, or otherwise unnecessary.

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

Response: As supported by the proceeding analysis, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and a less-than-significant impact would occur.

Consistency with Federal Energy Regulations

Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)

Transportation and access to the Project Site is provided by the local and regional roadway systems. The Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be realized pursuant to the ISTEA because SCAG is not planning for intermodal facilities on or through the Project Site (Urban Crossroads, 2022b, p. 35).

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

The Transportation Act for the 21st Century (TEA-21)
The Project Site is located along major transportation corridors with proximate access to the Interstate freeway system. The property selected for the Project facilitates access, acts to reduce vehicle miles traveled and takes advantage of existing infrastructure systems. The Project supports the strong planning processes emphasized under TEA-21. The Project is therefore consistent with, and would not otherwise interfere with, nor obstruct implementation of TEA-21 (Urban Crossroads, 2022b, p. 35).

Consistency with State Energy Regulations

State of California Energy Plan
The Project Site is located along major transportation corridors with proximate access to the Interstate freeway system. The location of the Project Site facilitates access and takes advantage of existing infrastructure systems. The Project therefore supports urban design and planning processes identified under the State of California Energy Plan and would not otherwise interfere with, nor obstruct implementation of the State of California Energy Plan (Urban Crossroads, 2022b, p. 36).

California Code Title 24, Part 6, Energy Efficiency Standards
The Project would design building shells and building components, such as windows; roof systems: electrical and lighting systems: and heating, ventilating, and air conditioning systems to meet 2019 Title 24 Standards. The Project also is required by State law to be designed, constructed, and operated to meet or exceed Title 24 Energy Efficiency Standards. On this basis, the Project is determined to be consistent with, and would not interfere with, nor otherwise obstruct implementation of Title 24 Energy Efficiency Standards (Urban Crossroads, 2022b, p. 36).

Pavley Fuel Efficiency Standards (AB 1493)
AB 1493 is not directly applicable to the Project as it is a statewide measure establishing vehicle emissions standards; however, is indirectly applicable to the Project because passenger cars and light duty trucks traveling to and from the Project Site are required to comply with the legislation's fuel efficiency requirements. No feature of the Project would interfere with implementation of the requirements under AB 1493 (Urban Crossroads, 2022b, p. 36).

California Renewable Portfolio Standards (SB 1078)
Established under SB 1078, the California Renewable Portfolio Standards do not directly apply to the Project as it is a statewide measure that establishes a renewable energy mix. Energy directly or indirectly supplied to the Project Site by electric corporations is required by law to comply with SB 1078. On this basis, the Project is determined to be consistent, with, and would not interfere with, nor otherwise obstruct implementation of California Renewable Portfolio Standards (Urban Crossroads, 2022b, p. 36).

Clean Energy and Pollution Reduction Act (SB 350)
The proposed Project would use energy from MVU, which has committed to diversify their portfolio of energy sources by increasing energy from wind and solar sources. No feature of the Project would interfere with implementation of SB 350. Additionally, the Project would be designed and constructed to implement the energy efficiency measures for new commercial developments and would include several measures designed to reduce energy consumption (Urban Crossroads, 2022b, p. 36).

Sources:

1. Urban Crossroads, Inc. 2022b. *Cottonwood & Edgemont Warehouse Energy Analysis*. (Technical Appendix D)

VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to	☐	☐	☐	☒

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf				

Response: According to a *Geotechnical Investigation* prepared for the Project by LOR Geotechnical Group Inc. (LOR), which is included as Technical Appendix E to this Initial Study, the Project Site is not located on or near an active fault or within a mapped Alquist-Priolo Earthquake Fault Zone (LOR, 2021, p. 6). Because there are no known faults located on or trending towards the Project Site, the Project would not directly or indirectly expose people or structures to substantial adverse effects related to rupture of a known earthquake fault.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

Response: The Project Site is in a seismically active area of southern California and is expected to experience moderate to severe ground shaking during the lifetime of the Project. This risk is not considered substantially different than that of other similar properties in the southern California area. As a mandatory condition of Project approval, the Project would be required to construct the proposed building in accordance with the California Building Standards Code (CBSC), also known as California Code of Regulations (CCR), Title 24 (Part 2), and the Moreno Valley Building Code, which is based on the CBSC with local amendments. The CBSC and Moreno Valley Building Code (Moreno Valley Municipal Code, Chapter 8.20) provide standards that must be met to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures, and have been specifically tailored for California earthquake conditions. In addition, the CBSC (Chapter 18) and the Moreno Valley Building Code (Chapter 8.21) require development projects to prepare geologic engineering reports to identify site-specific geologic and seismic conditions and implement the site-specific recommendations contained therein, including, but not limited to, recommendations related to ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems in order to preclude adverse effects involving unstable soils and strong seismic ground-shaking. The Project Applicant retained a professional geotechnical firm, LOR, to prepare a geologic investigation for the Project Site (see *Technical Appendix E*). The geologic investigation included recommendations for design, construction, and grading considerations based on the geological conditions on the Project Site and the Project's site design. The recommendations included seismic design considerations, geotechnical design considerations, site grading recommendations, construction considerations, foundation design and construction, floor slab design and construction, and pavement design parameters. The geologic investigation complies with the requirements of Chapter 18 of the CBSC and Chapter 8.21 of the Moreno Valley Municipal Code. In conformance with the Municipal Code, the City will condition the Project Applicant to comply with the site-specific ground preparation and construction recommendations contained in the Geologic Investigation. With mandatory compliance with building code standards and site-specific design and construction measures, implementation of the Project would not directly or indirectly expose people or structures to substantial adverse effects, including loss, injury, or death, involving seismic ground shaking. Impacts would be less than significant.

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

Response: According to the Project's geologic investigation and information contained in the City's General Plan, the Project Site is in an area with a very low liquefaction susceptibility (City of Moreno Valley, 2021a, Map S-2; LOR, 2021, p. 8). Notwithstanding, as noted above, the City will require the Project Site be developed in accordance with the latest applicable seismic safety guidelines, including the standard requirements of the CBSC and the Moreno Valley Building Code, to minimize potential liquefaction hazards. In addition, the Project Applicant would be required via conditions of approval to comply with the grading and construction recommendations contained within the Project's geologic investigation for the Project Site to further reduce the risk of seismic-related hazards, including ground failure due to liquefaction. Therefore, implementation of the Project would not directly or indirectly expose people or structures to substantial hazards associated with seismic-related ground failure and/or liquefaction hazards. Impacts would be less than significant.

iv) Landslides?	☐	☐	☒	☐

Response: According to the Project's geologic investigation, the Project Site is relatively flat and is in an area of the City where landslides are not common; additionally, during the field survey, no evidence of

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

mass movement was observed on the Project Site (LOR, 2021, p. 6). Moreover, according to the City's General Plan (refer to Map S-2, *Landsliding*), the Project Site is located in an area that has a low potential for landslides. The Project would introduce retaining walls along portions of the northern and southern boundaries of the Project Site; however, as required by Moreno Valley Municipal Code Chapter 8.21, the proposed retaining walls would be constructed in accordance with the site-specific recommendations contained within the geologic analysis for the Project Site (see *Technical Appendix E*). Mandatory compliance with the recommendations contained within the Project Site's geotechnical report would ensure that the Project is engineered and constructed to maximize stability and preclude safety hazards to on-site and abutting off-site areas. Accordingly, the Project would not be exposed to substantial landslide risks, and implementation of the Project would not pose a substantial direct or indirect landslide risk to surrounding properties. Impacts would be less than significant.

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

Response: Grading and earthwork activities associated with Project construction would expose soils to potential short-term erosion by wind and water. The Project Applicant would be required to obtain coverage under the State's General Construction Storm Water Permit for construction activities (NPDES permit). The NPDES permit is required for all development projects that include construction activities, such as clearing, grading, and/or excavation, that disturb at least one (1) acre of total land area. In addition, the Project Applicant would be required to comply with the Santa Ana RWQCB's *Santa Ana River Basin Water Quality Control Program*. Compliance with the NPDES permit and the Santa Ana River Basin Water Quality Control Program involves the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) for construction-related activities. The Project's SWPPP will specify the Best Management Practices (BMPs) that the Project Applicant will be required to implement during construction activities to ensure that waterborne pollution – including erosion/sedimentation – is prevented, minimized, and/or otherwise appropriately treated prior to surface runoff being discharged from the subject property. Examples of BMPs that may be utilized during construction include, but are not limited to, sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, and hydro-seeding. In addition, the Project Applicant would be required to comply with SCAQMD Rule 403, which would reduce the amount of particulate matter in the air and minimize the potential for wind erosion (SCAQMD, 2005). With mandatory compliance to the requirements noted in the Project's SWPPP, as well as applicable regulatory requirements, the potential for water and/or wind erosion impacts during Project construction would be less than significant.

Long-term operational impacts related to soil erosion or loss of topsoil would be precluded by compliance with regulatory measures. To meet the requirements of the City's Municipal Storm Water Permit, and in accordance Moreno Valley Municipal Code Section 8.21.170, the Project Applicant would be required to prepare and implement a Water Quality Management Plan (WQMP), which is a site-specific post-construction water quality management program designed to minimize the release of potential waterborne pollutants. The WQMP is required to identify an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate sediment discharge to surface water from storm water and non-storm water discharges. The preliminary WQMP for the Project, which is provided as *Technical Appendix I1* to the Initial Study, identifies non-structural source control BMPs (such as vacuum sweeping of parking lots as part of routine maintenance), structural source control BMPs (such as utilizing efficient irrigation systems that minimize overspray), and preventive, low impact development BMPs (such as the use of permeable surfaces across the site, catch basin inserts, and an underground retention system) to minimize erosion. The WQMP also is required to establish a post-construction implementation and maintenance plan to ensure on-going, long-term erosion protection. Compliance with the WQMP will be required as a condition of approval for the Project, as will the long-term maintenance of erosion and sediment control features. Because the Project would be required to utilize erosion and sediment control measures to preclude substantial, long-term soil erosion and loss of topsoil, the Project would result in less-than-significant impacts related to soil erosion.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

Response: As noted under Response VII(a), the Project Site is neither located in an area susceptible to landsliding nor located on a geologic unit or soil that is unstable that would result in on- or off-site landslides. No impact would occur.

Lateral spreading is a phenomenon in which large blocks of intact, non-liquefied soil move downslope on a liquefied soil layer. Lateral spreading is a regional event. For lateral spreading to occur, the liquefiable soil zone must be laterally continuous, unconstrained laterally, and free to move along the sloping ground. The Project Site's potential for lateral spreading is considered low due to the Site's relatively flat topography, distance from slopes, and no potential for liquefaction (as noted under Response VII(a)). The Project would not be located on a geologic unit or soil that would result in lateral spreading. No impact would occur.

According to the United States Geological Survey (USGS), subsidence is the gradual settling or sudden sinking of the Earth's surface due to removal or displacement of subsurface earth materials. The Project Site was not previously used for underground mining or groundwater extraction. Therefore, the Project Site has a very low potential to be located on a geologic unit or soil that is susceptible to subsidence. Impacts would be less than significant.

According to field investigations performed by LOR as part of the geologic investigation, the Project Site is underlain by relatively dense to very dense older alluvial material; thus, the potential for settlement is very low (LOR, 2021, p. 8). Notwithstanding, in accordance with the recommendations contained in the Project's geologic investigation (which the City of Moreno Valley would assign as conditions of approval pursuant to Municipal Code Section 8.21.050), the Project's grading activities would include the removal of near surface soils down to competent materials and replacement with properly compacted fill, which would preclude potential soil hazards related to settlement and ensure that potential soil hazards related to settlement remain less than significant (LOR, 2021, p. 13).

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

Response: According to soil testing performed as part of LOR's geologic investigation of the Project Site, the Site contain soils with a very low expansion potential (LOR, 2021, p. 15). Accordingly, the Project would not create substantial risks to life or property from exposure to expansive soils. No impact would occur.

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

Response: The Project does not propose the use of septic tanks or alternative wastewater disposal systems. No impact would occur.

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

Response: A *Paleontological Assessment* was prepared by BFSA and is included as *Technical Appendix F* to this Initial Study. According to the BFSA's assessment, the Project Site is underlain by very old alluvial fan deposits from the Middle to Early Pleistocene era, which have a high paleontological resource sensitivity (BFSA, 2022b, p. 8). If Project grading and excavation activities encroach into previously undisturbed Pleistocene-age alluvial deposits, the Project could result in impacts to important paleontological resources that may exist below the ground surface if they are unearthed and not properly

protected. Therefore, the Project's potential to directly or indirectly destroy a unique paleontological resource buried beneath the ground surface is determined to be a significant impact and mitigation is required.

Implementation of MM GEO-1 through MM GEO-4 would ensure the proper identification and subsequent treatment of any paleontological resources that may be encountered during ground-disturbing activities associated with implementation of the proposed Project. Therefore, with implementation of MM GEO-1 through MM GEO-4, the Project's potential impacts related to paleontological resources would be reduced to less-than-significant levels.

Mitigation

MM GEO-1 Prior to the issuance of a grading permit, the Project Applicant shall provide evidence to the City of Moreno Valley that a qualified paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.

MM GEO-2 The paleontological monitor shall conduct full-time monitoring during mass grading, trenching, and excavation operations in undisturbed, very old alluvial fan sediments that occur at depths between 1-5 feet below the existing ground surface on the Project Site. The paleontological monitor shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontological monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified paleontological personnel to have a low potential to contain or yield fossil resources.

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

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

Sources:

1. LOR Geotechnical Group, Inc (LOR), *Preliminary Geotechnical and Infiltration Feasibility Investigation Proposed Industrial Development APNs 263-190-012, -014, -015, -016, -017, -018, -019, and -036 Moreno Valley, California.* (Technical Appendix E)
2. Brian F. Smith and Associates, *Paleontological Assessment for the Cottonwood & Edgemont Project*, (Technical Appendix F)
3. Moreno Valley General Plan 2040
   - Chapter 6 – Safety
     - Map S-2, Liquefaction Hazard
     - Map S-3, Landslide Hazards
3. Moreno Valley Municipal Code Section 8.20 – Moreno Valley Building Code
4. Moreno Valley Municipal Code Section 9.08.160 – Seismic Hazards
5. Moreno Valley Municipal Code Section 8.21.050 – Grading Permit Requirements
6. Moreno Valley Municipal Code Section 9.08.080 – Grading

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

Response: A *Greenhouse Gas Analysis* (GHGA, included as *Technical Appendix G*) was prepared by Urban Crossroads to quantify the greenhouse gas (GHG) emissions that would result from Project-related construction and operational activities. The findings of the Project's GHGA are incorporated into the analysis presented herein.

While estimated Project-related GHG emissions can be calculated, the direct impacts of such emissions on Global Climate Change (GCC) and global warming cannot be determined on the basis of available science because global climate change is a global phenomenon and not limited to a specific locale such as the Project Site and its immediate vicinity. Furthermore, there is no evidence that would indicate that the emissions from a project the size of the proposed Project could directly or indirectly affect the global climate. Because global climate change is the result of GHG emissions, and GHGs are emitted by innumerable sources worldwide, the proposed Project would not result in a direct impact to global climate change; rather, Project-related impacts to global climate change only could be potentially significant on a cumulative basis (Urban Crossroads, 2022c, p. 8). Therefore, the analysis below focuses on the Project's potential to contribute to global climate change in a cumulatively considerable way.

The City of Moreno Valley has not adopted a numerical threshold for determining the significance of GHG emissions; however, the City has discretion to select an appropriate significance criterion used by other agencies, based on substantial evidence. Specifically, the City has selected the 3,000 Metric Ton of Carbon Dioxide Equivalent Per Year ($MTCO_2e$/yr) per year threshold recommended by SCAQMD staff for residential and commercial sector projects against which to compare Project-related GHG emissions. If Project-related GHG emissions do not exceed the 3,000 $MTCO_2e$ per year threshold, then Project-related GHG emissions would clearly have a less-than- significant impact. On the other hand, if Project-related GHG emissions exceed 3,000 $MTCO_2e$ per year, the Project would be considered a substantial source of GHG emissions. Refer to the Project's GHGA (see *Technical Appendix G*) for a detailed discussion regarding the methodology used by SCAQMD to establish the significance threshold and their rationale in support of its use.

The annual GHG emissions associated with the Project are summarized in Table 7. The methodology used to calculate the Project's GHG emissions is described in detail in the Project's GHGA (see *Technical Appendix G*).

Table 7 Total Annual Project Greenhouse Gas Emissions

Emission Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Annual construction-related emissions amortized over 30 years	12.13	2.16E-03	4.77E-04	12.33
Area Source	0.01	3.00E-05	0.00	0.01
Energy Source	412.53	0.02	5.69E-03	414.80
Mobile Source	664.41	0.02	0.05	679.66
TRU Source				12.70
On-Site Equipment	101.50	0.03	0.00	102.32
Waste	24.48	1.45	0.00	60.66
Water Usage	62.37	0.76	0.02	86.70
Total CO_2e (All Sources)	**1,369.19**			

Source: (Urban Crossroads, 2022c) Table 3-6

As shown above, the Project will result in approximately 1,369.19 $MTCO_2e$ emissions annually, which would not exceed the significance threshold of 3,000 $MTCO_2e$ per year. Therefore, the Project would not generate substantial GHG emissions – either directly or indirectly – that would have a significant impact on the environment. Impacts would be less than significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?	☐	☐	☒	☐

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

On October 9, 2012, the Moreno Valley City Council approved an Energy Efficiency and Climate Action Strategy and related GHG analysis. The Energy Efficiency and Climate Action Strategy document identifies potential programs and policies to reduce overall City energy consumption and increase the use of renewable energy. The majority of the policies are directed at municipal operations of the City, but the document also contains recommended policies for the community at large (including private development projects). These recommended policies include but are not limited to energy efficiency, water use reduction, trip reduction, solid waste diversion, and educational policies. The overall goal of the Energy Efficiency and Climate Action Strategy is to ensure that the City is consistent with and would not otherwise conflict with the provisions of AB 32. As demonstrated by the analysis below, the Project would not conflict with the provisions of SB 32, which as a successor to AB 32 requires more stringent GHG emissions reductions than AB 32, and, therefore, would not obstruct implementation of the components of the City's Energy Efficiency and Climate Action Strategy that are applicable to the Project.

Additionally, as part of the adoption of General Plan 2040, the City adopted a Climate Action Plan (CAP). The CAP establishes an inventory of the City's baseline (year 2018) GHG emissions, quantifies the City's long-term GHG emissions, and establishes the measures the City will implement – including requirements for new development projects to be energy efficient – to achieve the year 2030 GHG emissions reduction goals of SB 32 as well as additional GHG emissions through the General Plan's horizon year (2040). As demonstrated by the analysis below, the Project would not conflict with the provisions of SB 32, and, therefore, would neither conflict with the CAP nor hinder or delay the City's ability to meet the GHG emissions reductions targets that are outlined in the CAP.

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

CARB identified measures in their 2017 Scoping Plan Update to identify the measures that would achieve the emissions reductions goals of SB 32. As explained in point-by-point detail in Section 3.7 of the Project's GHGA (refer to Table 3-7 of *Technical Appendix G*), the Project would not conflict with applicable measures of the 2017 Scoping Plan Update and would not preclude/obstruct implementation of the Scoping Plan Update (Urban Crossroads, 2022c, pp. 49-53).

According to research conducted by the Lawrence Berkeley National Laboratory and supported by the CARB, California, under its existing and proposed GHG reduction policies (i.e., CARB Scoping Plan), is on track to meet the year 2030 reduction targets established by SB 32 (Urban Crossroads, 2022c, p. 29). As described above, the Project would not conflict with or obstruct implementation of the CARB Scoping Plan; therefore, the Project would not interfere with the State's ability to achieve the year 2030 GHG-reduction target established by SB 32.

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

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

analyses are subject to limitations for purposes of quantitatively estimating the Project's emissions in 2050.

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

Sources:

1. Urban Crossroads, Inc (Urban Crossroads). 2022c. *Cottonwood & Edgemont Warehouse Greenhouse Gas Analysis.* (Technical Appendix G)

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

Response: A *Phase I Environmental Site Assessment (ESA)* (*Technical Appendix H*) was prepared for the Project by Partner Engineering and Science, Inc. (Partner). As part of the Phase I ESA efforts, Partner conducted a visual inspection of the Project Site, researched regulatory hazardous materials databases, and reviewed historical reference materials (including aerial photographs, topographic maps, and City of Moreno Valley directories). The analysis below, which incorporates the findings of Partner's research, addresses the potential effects related to hazardous materials that may be uncovered on the Project Site under existing conditions or may be utilized while constructing and/or operating the Project.

Existing Site Conditions Impacts

The Project Site is vacant and undeveloped and has been so since approximately 1994. Prior to 1994, the Project Site contained multiple residences (from at least 1938). Based on a review of historic regulatory agency hazardous materials databases, historic site aerial photographs, and a reconnaissance of the Project Site, SCS determined that the Project Site does not contain any recognized environmental conditions (RECs) (Partner, 2021, p. 6). A REC is the presence or likely presence of any hazardous substances 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. Based on the lack of observed or historic hazardous conditions on the Project Site, implementation of the Project would not create a significant hazard to the public of environment through routine transport, use, or disposal of hazardous materials from the Project Site under existing conditions. A less-than-significant impact would occur.

Construction-Related Impacts

Heavy equipment (e.g., dozers, excavators, tractor) would operate on the subject property during construction of the Project. Heavy equipment is typically fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which is considered hazardous if improperly stored or handled. Also, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project Site during construction. Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the proposed Project than would occur on any other similar construction site. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the Environmental Protection Agency (EPA), US Department of Transportation regulations listed in the Code of Federal Regulations (Title 49, Hazardous Materials Transportation Act); California Department of Transportation standards; California Department of Toxic Substances Control (DTSC), SCAQMD, Santa Ana Regional Water Quality Control Board (RWQCB), and the California Department of Industrial Relations Division of Occupational Safety and Health (DOSH), better known as Cal/OSHA. With mandatory compliance to applicable hazardous materials regulations, the Project would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. Impacts would be less than significant.

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

Long-Term Operational Impacts

The Project Site would be used for industrial land uses, which could include warehouse distribution businesses. There is the potential for hazardous materials (e.g., diesel fuel, cleansers, lubricants) to be used during the course of normal daily operations at the Project Site with these types of users. State and federal Community-Right-to-Know laws allow the public access to information about the amounts and types of chemicals that may be used by businesses on the Project Site. Laws also are in place that requires businesses to plan and prepare for possible chemical emergencies. Any business that occupies a building on the Project Site and that handles hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) will require a permit from the Moreno Valley Fire Department Hazardous Materials Division in order to register the business as a hazardous materials handler. Such businesses also are required to comply with California's Hazardous Materials Release Response Plans and Inventory Law, which requires immediate reporting to the County of Riverside Fire Department and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business. In addition, any business handling at any one time, greater than 500 pounds of solid, 55 gallons of liquid, or 200 cubic feet of gaseous hazardous material, is required, under Assembly Bill 2185 (AB 2185), to file a Hazardous Materials Business Emergency Plan (HMBEP). A HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.

If businesses that use or store hazardous materials occupy the Project, the business owners and operators would be required to comply with all applicable federal, state, and local regulations to ensure proper use, storage, use, emission, and disposal of hazardous substances (as described above). With mandatory regulatory compliance, the Project is not expected to pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment.

With mandatory regulatory compliance, potential hazardous materials impacts associated with long-term operation of the Project are determined to be less than significant and mitigation is not required.

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

Response: Accidents involving hazardous materials that could pose a significant hazard to the public or the environment would be highly unlikely during the construction and long-term operation of the Project and are not reasonably foreseeable. As discussed above under Response IX(a), the transport, use, and handling of hazardous materials on the Project Site during construction is a standard risk on all construction sites, and there would be no greater risk for upset and accidents than would occur on any other similar construction site. Upon buildout, the Project Site would operate as a warehouse distribution center. Based on the operational characteristics of warehouse distribution centers, it is possible that hazardous materials could be used during a future occupant's daily operations; however, as discussed above under Response IX(a), the Project Applicant would be required to comply with all applicable local, State, and federal regulations related to the transport, handling, and usage of hazardous material. Accordingly, impacts associated with the accidental release of hazardous materials would be less than significant during both construction and long-term operation of the Project and mitigation would not be required.

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: There are no existing or proposed schools within 0.25-mile of the Project Site (Google Earth, 2022). The nearest existing school to the Project Site is Towngate Elementary School, which is located approximately 0.75-mile northeast of the Project Site. Thus, the Project would not have a significant effect in emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25-mile of an existing or proposed school. No impact would occur.				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
Response: Partner conducted a review of hazardous materials databases while preparing the Project's Phase I ESA (refer to Section 4.0 of *Technical Appendix H*). Partner determined that the Project Site is not included on any hazardous materials database list, including hazardous materials databases compiled pursuant to Government Code Section 65962.5 (Partner, 2021, pp. 9-13). No impact would occur.				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
Response: The Project Site is located approximately 1.0-mile northwest of the March Air Reserve Base / Inland Port (MARB/IP) Airport. According to the MARB/IPA Airport Land Use Compatibility Plan (ALUCP), the Project Site is located within the Inner Approach/Departure Zone (Compatibility Zone B1) and the Primary Approach/Departure Zone (Compatibility Zone C1) (RCALUC, 2014, Map A-1). Properties within Compativility Zones B1 and C1 are subject to relatively high accident hazard potential and noise levels associated with aircraft operations, and sensitive land uses such as schools, hospitals, and congregate care facilities are prohibited; however, uses non-sensitive uses – like the light industrial use proposed by the Project – are allowed within Zones B1 and C1 subject to density restrictions. The Project would be cosnsitent with the density restructions of the ALUCP. The Project would not result in safety hazards for people residing or working in the Project area. Impacts would be less than significant.				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
Response: The Project Site does not contain any emergency facilities under existing conditions, nor does it serve as an emergency evacuation route (City of Moreno Valley, 2017, p. 97); there is no potential for the Project to adversely affect an existing emergency response or evacuation plan. During construction and at Project buildout, the Project would be required to maintain adequate emergency access for emergency vehicles as required by the City. As part of the City's discretionary review process, the City of Moreno Valley reviewed the Project to ensure that appropriate emergency ingress and egress would be available to-and-from the proposed warehouse building for public safety and determined that the Project would not substantially impede emergency response times in the local area. Accordingly, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan, and no impact would occur.				
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒
Response: According to Map S-5, *Fire Hazard Severity Zones*, of the City's General Plan, the Project Site is not within a fire hazard severity zone (FHSZ) or is in proximity to a FHSZ (City of Moreno Valley,				

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

2021a). No wildlands are located on or adjacent to the Project Site and the Project Site is largely disturbed or devoid of vegetation and surrounded on all sides by developed or maintained properties and paved roads. Thus, implementation of the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. No impact would occur.

Sources:

1. Partner Engineering and Science, Inc. (Partner). 2022. *Phase I Environmental Site Assessment Report*. (Technical Appendix H)
2. Moreno Valley General Plan 2040
   - Chapter 6 – Safety Element
     - Map S-5 – Fire Hazard Severity Zones
     - Map S-7 – Emergency Evacuation Risk Assessment
3. Local Hazard Mitigation Plan 2017
4. Riverside County Airport Land Use Commission, March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700

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: As demonstrated in the analysis below, the Project would not violate any water quality standards or waste discharge requirements.

As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) has established regulations under the NPDES program to control direct storm water discharges. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The City of Moreno Valley, including the Project Site, is within the jurisdiction of the Santa Ana RWQCB.

The Project has the potential to result in water quality impacts during short-term construction activities. The grading/excavation required for Project implementation would temporarily result in exposed soils that may be subject to wind and water erosion. Although erosion occurs naturally in the environment, improperly managed construction activities can lead to substantially accelerated rates of erosion that are considered detrimental to the environment. As such, short-term water quality impacts have the potential to occur during construction of the Project in the absence of any protective or avoidance measures. Pursuant to the requirements of the Santa Ana RWQCB and the City of Moreno Valley (Municipal Code Chapter 8.10 et seq. and Section 8.21.170), the Project Applicant would be required to obtain coverage under the State's General Construction Storm Water Permit (NPDES Permit). The NPDES Permit is required for all projects that include construction activities, such as clearing, soil stockpiling, grading, and/or excavation that disturb at least one (1) acre of total land area, as is the case with the proposed Project. In addition, the Project Applicant would be required to comply with the Santa Ana RWQCB's *Santa Ana River Basin Water Quality Control Program*. Compliance with the NPDES Permit and the *Santa Ana River Basin Water Quality Control Program* involves the preparation and implementation of a SWPPP for construction-related activities, including grading. The SWPPP will specify the BMPs that the Project Applicant would be required to implement during construction activities to ensure that all potential pollutants of concern are prevented, minimized, and/or otherwise appropriately treated prior to being discharged from the subject property. Examples of BMPs that may be utilized during construction include, but are not limited to, sandbag barriers, geotextiles, storm drain inlet protection, sediment traps,

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

rip rap soil stabilizers, and hydro-seeding. Mandatory compliance with the SWPPP would ensure that the Project's construction does not violate any water quality standards or waste discharge requirements.

Stormwater pollutants that may be produced during Project operation include bacterial indicators, metals, nutrients, pesticides, sediments, trash & debris, oil & grease, and toxic organic compounds (CASC, 2021b, p. 22). The Project Applicant would be required to implement a WQMP to demonstrate compliance with the City's NPDES municipal stormwater permit, and to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters. The WQMP is a site-specific post-construction water quality management program designed to address the pollutants of concern of a development project via BMPs, implementation of which ensures the on-going protection of the watershed basin. The Project's preliminary WQMP is included as Technical Appendix H to this EIR. As identified in the preliminary WQMP, the Project is designed to include structural source control BMPs (including underground detention basin and modular wetland system) as well as operational source controls (including but not limited to: drainage system maintenance, storm drain system stenciling and signage, and implementation of minimal pesticide use) to minimize, prevent, and/or otherwise appropriately treat stormwater runoff flows before they are discharged from the site. Compliance with the WQMP would be required as a condition of Project approval pursuant to Municipal Code Chapter 8.10 and Municipal Code Section 8.21.170, and long-term maintenance of on-site BMPs would be required to ensure their long-term effectiveness. Therefore, water quality impacts associated with long-term operational activities would be less than significant.

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

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

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

Response: The Project Applicant does not propose the use of any wells or other groundwater extraction activities on the Project Site. Therefore, the Project would not directly extract groundwater resources. Accordingly, implementation of the proposed Project has no potential to substantially deplete or decrease groundwater supplies and the Project's impact to groundwater supplies would be less than significant.

Development of the Project would increase impervious surface coverage on the property, which would reduce the amount of water percolating down into the underground aquifer that underlies the Project Site and a majority of the City. However, and as noted in the City's General Plan EIR, the impact of an incremental reduction in groundwater would not be significant as domestic water supplies are not reliant on groundwater as a primary source (City of Moreno Valley, 2021c, pp. 4.10-5). With buildout of the

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Project, the local groundwater levels would not be substantially adversely affected. Accordingly, buildout of the Project would not interfere substantially with groundwater recharge. For the reasons stated above, the Project would neither substantially deplete groundwater supplies nor interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Impacts would be less than significant.				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
Response: Under existing conditions, the Project Site drains from the south to the north as surface sheet flow, with runoff ultimately flowing unto the Edgemont Channel. (CASC, 2021a, p. 1) The Project would mass grade the entire property and construct two light industrial buildings and associated improvements, which would change the Project Site's existing ground contours and alter the existing drainage patterns interior to the Project Site. Upon buildout of the Project, stormwater flow generated on the Project Site would flow through the proposed on-site storm drain system and discharge to the Edgemont Channel (as occurs under existing conditions). Although the Project would alter the subject property's drainage patterns, such changes would not result in substantial erosion or siltation on- or off-site. Under post-development conditions, a majority of the Project Site would be covered with impervious surfaces and, therefore, the amounts of exposed soils on the Project Site would be minimal. Also, as discussed under Response X(a), the Project would construct an integrated storm drain system on-site with BMPs to minimize the amounts of water-borne pollutants carried from the Project Site. The BMPs proposed by the Project are effective at removing sediment from stormwater runoff flows (CASC, 2021b, p. 7). Therefore, stormwater runoff flows leaving the Project Site would not carry substantial amounts of sediment. Once stormwater runoff leaves the Project Site, it would be discharged to the proposed public storm drain line running through the Project Site that will constructed as part of the Project. Because stormwater runoff from the Project Site would be discharged with a relatively low flow rate within an existing, concrete-lined drainage channel (i.e., Edgemont Channel), there is no potential for the Project's stormwater runoff to result in substantial erosion as it leaves the Project Site. Accordingly, implementation of the Project would not result in substantial erosion or siltation on- site or off-site, and a less-than-significant impact would occur.				
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	☐	☐	☒	☐
Response: Proposed grading and earthwork activities on the Project Site would alter the Site's existing drainage patterns but would not substantially alter the drainage pattern of the local area, as runoff within the Project Site and from I-215 Frontage Road and Edgemont Street would continue to flow northerly to the Edgemont Channel as occurs under existing conditions. Furthermore, according to a *Preliminary Drainage Study* prepared for the Project (see *Technical Appendix I2*), runoff flows discharged from the Project Site during peak storm events would not exceed existing volumes and flow rates (CASC, 2021a, p. 4). Accordingly, implementation of the Project would not substantially increase the rate or amount of surface water runoff discharged from the site in a manner that would result in flooding on- or off-site or that would exceed the capacity of the existing stormwater drainage system servicing the Project Site. Impacts would be less than significant.				
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
Response: The Project's proposed storm drain system is sized and designed to discharge on-site flows at a volume and rate that does not exceed existing conditions and can be accommodated by existing storm drain facilities. Accordingly, implementation of the Project would not create or contribute runoff				

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

water that would exceed the capacity of the existing stormwater drainage system servicing the Project Site. Impacts would be less than significant.

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

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

Response: According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06065C0745G the Project Site is primarily located within FEMA Flood Zone X (unshaded), with the remainder of the Site (the northeast portion) is located within FEMA Flood Zone X (shaded). The FEMA Flood Zone X (unshaded) is defined as areas of minimal flood hazard, located outside a special flood hazard area (SFHA) and with less than a 0.2 percent annual chance flood. The FEMA Flood Zone X (shaded) is defined as areas of moderate flood hazards, but not within a SFHA, and are between the limits of the 1 percent annual flood and the 0.2 percent annual flood. (FEMA, 2008; FEMA, 2020) Although FEMA Flood Zone X (shaded) is not considered a SFHA, the Project would not place any vertical structures or other improvements on the portion of the Site located within the Flood Zone X (shaded) area that could impede or redirect flood flows. Based on the foregoing analysis, the Project would not impede or redirect flood flows and impacts would be less than significant.

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

Response: The Project Site is not within a 100-year flood hazard zone. Therefore, the Project does not have the potential to release pollutants due to 100-year flood inundation (FEMA, 2020). A tsunami is a sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a seafloor associated with large, shallow earthquakes. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The Project Site is located approximately 45 miles northeast of the Pacific Ocean. Due to distance, the Project would not be subject to tsunami-related inundation. Additionally, there are no enclosed or semi-enclosed bodies of water in proximity to the Project Site. Due to distance, the Project would not be subject to seiche related inundation. No impacts would occur.

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

Response: The Project Site is within the Santa Ana River Basin and Project-related construction and operational activities would be required to comply with the Santa Ana RWQCB's *Santa Ana River Basin Water Quality Control Plan* by preparing and adhering to a SWPPP and WQMP. Implementation of the Project would not conflict with or obstruct the Santa Ana River Basin Water Quality Control Plan and impacts would be less than significant.

Additionally, as discussed under Response X(a) above, the Project would not substantially decrease groundwater supplies nor interfere substantially with groundwater recharge and, therefore, is not expected to conflict with or obstruct a sustainable groundwater management plan. Further, BSMWC produces potable groundwater from the San Bernardino – Riverside Groundwater Basin – South, which is an adjudicated basin (DWR, 2022a; DWR, 2022b). Adjudicated basins are exempt from the 2014 Sustainable Groundwater Management Act (SGMA) requirement to develop Groundwater Sustainability Plan because such basins already operate under a court-ordered water management plan to ensure their long-term sustainability. No component of the Project would obstruct with or prevent implementation of the management plan for the San Bernardino – Riverside Groundwater Basin – South. As such, the Project's construction and operation would not conflict with any sustainable groundwater management plan. Impacts would be less than significant.

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

Sources:

1. CASC Engineering and Consulting, 2021a, *Preliminary Hydrology Calculations*. (Technical Appendix I1*)*
2. CASC Engineering and Consulting, 2021b, *Project-Specific Water Quality Management Plan*. (Technical Appendix I2)
3. Federal Emergency Management Agency (FEMA) – Flood Map Service Center: Flood Insurance Rate Map No. 06065C0745G, https://msc.fema.gov/portal/search?AddressQuery=Edgemont%2C%20CA#searchresultsanchor
4. Federal Emergency Management (FEMA) Flood Zones – Glossary https://www.fema.gov/glossary/flood-zones
5. Google Earth Pro
6. Department of Water Resources, Adjudicated Basins Annual Reporting, https://sgma.water.ca.gov/webgis/index.jsp?appid=adjbasin
7. Department of Water Resources, Basin Prioritization https://gis.water.ca.gov/app/bp-dashboard/final/

XI. LAND USE AND PLANNING – Would the project:

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

Response: Development of the Project would not physically disrupt or divide the arrangement of an established community. Under existing conditions, the Project Site is bordered by Old 215 Frontage Road on the west, Edgemont Street on the east, and legal non-conforming residences on the north and south. The residences that border the Project Site on the north and south are separated by existing walls/fencing. Accordingly, the Project would not physically divide an established community because the site is already physically separated from abutting properties. Furthermore, the Project Site is not needed for access to any surrounding properties and development of the Project would not isolate an existing surrounding use. No impact would occur.

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

Response: The Project would develop the subject property in accordance with its underlying General Plan land use and zoning designations and would not conflict with any applicable policies contained in the General Plan or applicable zoning regulations/development standards contained in the Municipal Code. Because the Project would have no conflict with the General Plan and/or zoning regulations, no significant environmental impact would occur from such a conflict. Additionally, the Project would not conflict with any applicable goals, objectives, and policies of the SCAQMD's *AQMP*, SCAG's *Connect SoCal 2020-2045 RTP/SCS*, and SCAG's *Regional Comprehensive Plan*. Impacts would be less than significant.

Sources:

1. Moreno Valley Zoning Map, https://www.moval.org/city_hall/general-plan2040/NewZoning.pdf
2. Moreno Valley Adopted Land Use Map, https://www.moval.org/city_hall/general-plan2040/GP-LandUseMap.pdf

XII. MINERAL RESOURCES – Would the project:

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

Response: The Project Site is not within an area known to be underlain by regionally- or local- important mineral resources (City of Moreno Valley, 2021c, p. 4.12-4). Implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State of California. In addition, the City's General Plan EIR does not identify any locally-important mineral resource recovery sites on or within close proximity to the Project Site. No impacts would occur.

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

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

Sources:

1. Final Environmental Impact Report City of Moreno Valley General Plan 2040
   - Section 4.12 – Mineral Resources

XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

Response: A *Noise Impact Analysis* (NIA) was prepared for the Project by Urban Crossroads to evaluate Project-related long-term operational and short-term construction noise impacts. Additionally, Urban Crossroads prepared a supplemental noise analysis (SNIA) to evaluate Project-related off-site, short-term construction noise impacts. The NIA is included as *Technical Appendix J1* and the SNIA is included as *Technical Appendix J2* to this Initial Study and their findings are summarized on the following pages. Refer to Appendices 7.1 through 8.2 of the Project's NIA for detailed noise calculation worksheets.

Construction Noise Impact

Construction activities on the Project Site would create temporary periods of noise when heavy construction equipment is in operation and would cause a short-term increase in ambient noise levels. Each construction stage has a specific equipment mix, depending on the work to be completed during that stage. As a result, each stage has its own noise characteristics; some stages have higher continuous noise levels than others, and some have higher impact noise levels than others. The Project's construction activities are expected to occur in the following stages: 1) site preparation; 2) grading; 3) building construction; 4) paving; and 5) application of architectural coatings. The maximum daytime Project construction noise levels at representative sensitive receptor locations near the Project Site are summarized in Table 8 (refer to Exhibit 8-A of the Project's NIA for receptor locations). Table 8 also presents maximum daytime (7:01 am – 7:59 pm) construction noise levels at a distance of 200 feet from the Site, which is the standard for evaluation established by the City's Municipal Code (see Chapter 11.80).

Table 8 Daytime Construction Equipment Noise Level Summary

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})					
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]
R1	64.0	67.0	65.0	67.0	61.0	67.0
R2	66.9	69.9	67.9	69.9	63.9	69.9
R3	59.4	62.4	60.4	62.4	56.4	62.4
R4	59.2	62.2	60.2	62.2	56.2	62.2
R5	59.9	62.9	60.9	62.9	56.9	62.9
R6	58.4	61.4	59.4	61.4	55.4	61.4
at 200'	58.0	61.0	59.0	61.0	55.0	61.0

[1] Noise receiver locations are shown on Exhibit 10-A of the Project's NIA (see *Technical Appendix J1*).
[2] Construction noise level calculations based on distance from the construction activity, which is measured from the Project Site boundary to the nearest receiver locations. CadnaA construction noise model inputs are included in Appendix 8.1 of the Project's NIA.
Source: (Urban Crossroads, 2022d, Table 10-2)

As shown in Table 8, maximum construction noise levels are expected to range between 61.0 to 69.9 A-weighted decibels (dBA) equivalent sound level (L_{eq}) at the nearest receiver locations and 61.0 dBA L_{eq} at 200 feet from the property line of the Project Site. Pursuant to Moreno Valley Municipal Code Section 11.80.030(C), a significant impact would occur if Project construction activities were to generate daytime noise levels of 65 dBA L_{eq} or higher when measured at 200 feet from the Project Site boundary. Because Project construction activities would result in maximum noise levels of 61.0 dBA L_{eq} when measured at a distance of 200 feet from the Project Site, construction activities on the Project Site would not exceed the standard established by the Moreno Valley Municipal Code. Noise impacts from daytime construction activities would be less than significant.

There is the potential that specific construction activities (i.e., concrete pouring) could occur on the Project Site outside of daytime hours. Because the City's Municipal Code does not allow construction activities outside of daytime hours by right, the City would be required to approve any nighttime concrete pouring activities, pursuant to Municipal Code Section 11.80.030(D)(7). If nighttime construction activities were to occur, noise levels above 60 dBA L_{eq} at 200 feet from the Project Site would exceed the standards established in the City's Municipal Code (Section 11.80.030(C)). The only Project construction activities that have a reasonable potential to occur during nighttime hours are concrete pouring. Noise levels for nighttime concrete pouring are listed in Table 9.

As shown in Table 9, maximum nighttime concrete pour activities would not exceed 51.1 at nearby sensitive receptor locations or 47.2 dBA L_{eq} at a distance of 200 feet from the Project Site. Because potential nighttime concrete pouring activities would not exceed 60 dBA L_{eq} at a distance of 200 feet from the Project Site, Project construction would not exceed the standard established by the Moreno Valley Municipal Code. Impacts during nighttime construction activities would be less than significant.

Table 9 Nighttime Concrete Pour Noise Level Compliance

Receiver Location[1]	Use	Construction Noise Levels (dBA L_{eq})		
		Paving Construction[2]	Nighttime Threshold[3]	Threshold Exceeded?[4]
R1	Residence	36.6	60	No
R2	Residence	39.3	60	No
R3	Church	41.0	60	No
R4	Residence	47.4	60	No
R5	Residence	51.1	60	No
R6	Residence	46.3	60	No
at 200'	-	47.2	60	No

[1] Noise receiver locations are shown on Exhibit 10-B of the Project's NIA (see *Technical Appendix J1*).
[2] Paving construction noise level calculations based on distance from the construction noise source activity to nearby receiver locations.
[3] Exterior noise level standards as shown on Table 3-2 of *Technical Appendix J1*.
[4] Do the estimated Project construction noise levels exceed the nighttime construction noise level threshold?
Source: (Urban Crossroads, 2022d, Table 10-3)

Off-Site Improvements Construction Noise Impact

To support the Project's proposed development, off-site water line and storm drain improvements are proposed as part of the Project. As previously discussed, the Project proposes waterline improvements within the existing ROWs for Old 215 Frontage Road and Cottonwood Avenue and proposes a new connection to the existing concrete-lined Edgemont Channel. The Project also includes the construction of a new outlet within the Edgemont Channel.

As with the Project's on-site construction activities, the Project's off-site construction activities would be required to comply with the City's stationary-source noise level limits of 65 dBA L_{eq} when measured at a distance of 200 feet or more from the source during the daytime hours. At 200 feet from the source, the Project's off-site improvements are calculated to generate a construction source noise level of 63.3 dBA L_{eq}. (Urban Crossroads, 2022g, pp. 1-3) It is anticipated that the off-site improvements would proceed linearly along a proposed alignment and would not take place at one location for the entire duration of construction. Construction noise from this work would, therefore, be relatively short term because it

would take place for only a matter of days at the analyzed sensitive uses. As water pipe construction work moves linearly along the alignment and farther from sensitive uses, noise levels would be reduced. The construction noise analysis shows that the off-site construction noise levels will satisfy the City of Moreno Valley daytime 65 dBA Leq significance threshold at 200 feet during Project construction activities and impacts would be less than significant. (Urban Crossroads, 2022g, p. 3)

Operational Noise Impact

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

Table 10 Operational Noise Levels

Receiver Location[1]	Project Operational Noise Levels (dBA Leq)[2]		Noise Level Standards (dBA Leq)[3]		Noise Level Standards Exceeded?[4]	
	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
R1	54.6	54.6	65	60	No	No
R2	56.5	56.5	65	60	No	No
R3	55.0	55.0	65	60	No	No
R4	55.9	55.8	65	60	No	No
R5	49.4	48.2	65	60	No	No
R6	47.5	46.3	65	60	No	No
at 200'	52.3	52.1	65	60	No	No

[1] See Exhibit 8-A of *Technical Appendix J1*.
[2] Project operational noise levels as shown on Tables 9-3 and 9-4 of *Technical Appendix J1*
[3] Exterior noise level standards per Table 4-1 of *Technical Appendix J1*.
[4] Do the estimated Project operational noise source activities exceed the noise level standards?
"Daytime" = 8:00 a.m. - 10:00 p.m.; "Nighttime" = 10:01 p.m. - 7:59 a.m.
Source: (Urban Crossroads, 2022d, Table 9-5)

As shown in Table 10, the Project's operational noise levels would comply with the City's 65 dBA L_{eq} daytime and 60 dBA L_{eq} nighttime exterior noise level standard at a distance of 200 feet from the Project Site. Also, operational noise levels would not exceed 65 dBA L_{eq} (daytime) or 60 dBA L_{eq} (nighttime) at any sensitive receptor in the vicinity of the Project Site. The Project's contribution to the existing ambient noise environment would range between 0.0 and 3.0 dBA L_{eq} during the daytime and between 0.1 and 4.6 dBA L_{eq} during the nighttime, which is not considered a substantial increase based on standards established by the Federal Interagency Committee on Noise (FICON) (Urban Crossroads, 2022d, pp. 53-54). Based on the foregoing analysis, operation of the Project would not result in a substantial permanent increase in ambient noise levels in the vicinity of the Project in excess of applicable City standards. Impacts would be less than significant.

Off-Site Traffic Noise Impact

The analysis below addresses potential off-site traffic noise generated from the Project. To evaluate off-site noise increases that could result from Project-related traffic on the roadway system, noise levels were modeled for the following scenarios:

- Existing (2022) With Project
- Opening Year Cumulative (OYC) (2025) With Project

The Existing (2022) With Project scenario is provided solely for informational purposes and will not occur, since the Project will not be fully developed and occupied under Existing conditions. Table 11 shows that the Project off-site traffic noise levels will range from 66.0 to 77.1 dBA CNEL and noise level impacts will range from 0.0 to 0.2 dBA CNEL. As identified in Table 11, the Project's unmitigated off-site traffic noise level increases would not exceed the significance criteria for off-site traffic noise presented in Table 4-1 of *Technical Appendix J1*, land uses adjacent to the study area roadway segments would experience less than significant noise level impacts due to unmitigated Project-related traffic noise levels.

Table 11 Existing With Project Traffic Noise Level Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[1]			Incremental Noise Level Increase Threshold[2]	
				No Project	With Project	Project Addition	Limit	Exceeded ?
1	Old 215 Frontage Rd.	n/o Cottonwood Av.	Sensitive	70.8	71.0	0.2	1.5	No
2	Old 215 Frontage Rd.	s/o Cottonwood Av.	Sensitive	71.0	71.2	0.2	1.5	No
3	Old 215 Frontage Rd.	s/o Bay Av.	Sensitive	70.8	71.0	0.2	1.5	No
4	Old 215 Frontage Rd.	s/o Alessandro Bl.	Sensitive	65.9	66.0	0.1	1.5	No
5	Eucalyptus Av.	w/o I-215 Ramps	Non-Sensitive	68.5	68.5	0.0	n/a	No
6	Eucalyptus Av.	w/o Old 215 Frontage Rd.	Non-Sensitive	71.3	71.4	0.1	3.0	No
7	Eucalyptus Av.	e/o Old 215 Frontage Rd.	Sensitive	68.9	68.9	0.0	1.5	No
8	Alessandro Bl.	w/o I-215 Ramps SB	Non-Sensitive	77.1	77.1	0.0	3.0	No
9	Alessandro Bl.	w/o I-215 NB Ramps	Non-Sensitive	76.5	76.6	0.1	3.0	No
10	Alessandro Bl.	w/o Old 215 Frontage Rd.	Non-Sensitive	75.7	75.8	0.1	3.0	No
11	Alessandro Bl.	e/o Old 215 Frontage Rd.	Sensitive	73.4	73.4	0.0	1.5	No

[1] Based on a review of existing aerial imagery.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use. The City of Perris does not consider noise increases to non-noise-sensitive uses to be significant.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4-1 of *Technical Appendix J1*)?
Source: (Urban Crossroads, 2022d, Table 7-5)

The OYC (2025) With Project traffic condition analysis determine the potential near-term cumulative circulation system deficiencies. The roadway network under the OYC (2025) With Project scenario is similar to Existing conditions except for new connections to be constructed by other known cumulative projects or the Project. To account for background traffic growth, an ambient growth factor from Existing (2022) conditions of 6.12 percent (2 percent per year, compounded over 3 years) is included for Opening Year Cumulative (2025) traffic conditions (Urban Crossroads, 2023b, p. 4). Table 12 shows that the Project off-site traffic noise levels will range from 66.3 to 77.4 dBA CNEL and noise level impacts will range from 0.0 to 0.2 dBA CNEL. Based on the significance criteria for off-site traffic noise presented in Table 4-1 of *Technical Appendix J1*, land uses adjacent to the study area roadway segments would experience less than significant noise level impacts due to unmitigated Project-related traffic noise levels.

Table 12 OYC (2025) With Project Traffic Noise Level Increases

ID	Road	Segment	Receiving Land Use[1]	CNEL at Receiving Land Use (dBA)[1]			Incremental Noise Level Increase Threshold[2]	
				No Project	With Project	Project Addition	Limit	Exceeded ?
1	Old 215 Frontage Rd.	n/o Cottonwood Av.	Sensitive	71.4	71.6	0.2	1.5	No
2	Old 215 Frontage Rd.	s/o Cottonwood Av.	Sensitive	71.5	71.7	0.2	1.5	No
3	Old 215 Frontage Rd.	s/o Bay Av.	Sensitive	71.3	71.5	0.2	1.5	No
4	Old 215 Frontage Rd.	s/o Alessandro Bl.	Sensitive	66.2	66.3	0.1	1.5	No
5	Eucalyptus Av.	w/o I-215 Ramps	Non-Sensitive	69.2	69.2	0.0	n/a	No
6	Eucalyptus Av.	w/o Old 215 Frontage Rd.	Non-Sensitive	72.8	72.8	0.0	3.0	No
7	Eucalyptus Av.	e/o Old 215 Frontage Rd.	Sensitive	70.0	70.1	0.1	1.5	No
8	Alessandro Bl.	w/o I-215 Ramps SB	Non-Sensitive	77.4	77.4	0.0	3.0	No
9	Alessandro Bl.	w/o I-215 NB Ramps	Non-Sensitive	76.9	76.9	0.0	3.0	No
10	Alessandro Bl.	w/o Old 215 Frontage Rd.	Non-Sensitive	76.1	76.1	0.0	3.0	No
11	Alessandro Bl.	e/o Old 215 Frontage Rd.	Sensitive	73.7	73.7	0.0	1.5	No

[1] Based on a review of existing aerial imagery.
[2] The CNEL is calculated at the boundary of the right-of-way of each roadway and the property line of the receiving land use. The City of Perris does not consider noise increases to non-noise-sensitive uses to be significant.
[3] Does the Project create an incremental noise level increase exceeding the significance criteria (Table 4-1 of *Technical Appendix J1*)?
Source: (Urban Crossroads, 2022d, Table 7-6)

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

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

Construction Analysis
Construction activities on the Project Site would utilize construction equipment that has the potential to generate vibration. Table 13 summarizes Project construction vibration levels at the modeled receiver locations. As shown in Table 13, all receiver locations in the vicinity of the Project Site would be exposed to vibration levels that fall below the significance threshold used by the City of Moreno Valley for this analysis at all receiver locations. Accordingly, Project construction would not generate temporary, excessive groundborne vibration or noise levels and a less than significant impact would occur.

Operational Analysis
Under long-term conditions, the Project would not include nor require equipment, facilities, or activities that would result in substantial or perceptible groundborne vibration. Trucks would travel to and from the Project Site on surrounding roadways; however, vibration and groundborne noise levels for heavy trucks operating at the posted speed limits on smooth, paved surfaces – as is expected on the Project Site and surrounding roadways is minimal. Accordingly, Project operation would not generate excessive groundborne vibration or groundborne noise levels 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

Table 13 Construction Equipment Vibration Levels

Receiver[1]	Distance to Const. Activity (Feet)[2]	Typical Construction Vibration Levels PPV (in/sec)[3]					Thresholds PPV (in/sec)[4]	Thresholds Exceeded?[5]
		Small bulldozer	Jackhammer	Loaded Trucks	Large bulldozer	Highest Vibration Level		
R1	17'	0.005	0.062	0.136	0.159	0.159	0.3	No
R2	19'	0.005	0.053	0.115	0.134	0.134	0.3	No
R3	107'	0.000	0.004	0.009	0.010	0.010	0.3	No
R4	135'	0.000	0.003	0.006	0.007	0.007	0.3	No
R5	109'	0.000	0.004	0.008	0.010	0.010	0.3	No
R6	128'	0.000	0.003	0.007	0.008	0.008	0.3	No
at 200'	200'	0.000	0.002	0.003	0.004	0.004	0.3	No

[1] Receiver locations are shown on Exhibit 10-A of the Project's NIA (see *Technical Appendix J1*).
[2] Distance from receiver location to Project construction boundary (Project Site boundary).
[3] Based on the Vibration Source Levels of Construction Equipment (refer to Table 10-4 of *Technical Appendix J1*).
[4] Caltrans Transportation and Construction Vibration Guidance Manual, April 2020, Table 19, p. 38.
[5] Does the peak vibration exceed the acceptable vibration thresholds?
"PPV" = Peak Particle Velocity
Source: (Urban Crossroads, 2022d, Table 8-5)

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

Response: The Project Site is located within the Airport Influence Area (AIA) for the MARB/IPA and is within an area subjected to high to moderate airport noise. The light industrial land uses proposed by the Project are not sensitive to airport noise (even at high levels) and the Project's would not conflict with the ALUCP's land use compatibility standards related to noise (Urban Crossroads, 2022d, p. 24) Accordingly, the Project would not expose people residing or working the Project area to excessive noise levels from a public airport; therefore, impacts would be less-than-significant.

Sources:

1. Urban Crossroads, 2022d, *Cottonwood & Edgemont Warehouse Noise Impact Study*. (Technical Appendix J1)
2. Urban Crossroads, 2022g, *Cottonwood & Edgemont Warehouse Off-Site Improvements Noise Assessment.* (Technical Appendix J2)
3. Urban Crossroads, 2022h, *Cottonwood & Edgemont Warehouses Traffic Analysis* (Technical Appendix K3)
4. Moreno Valley General Plan 2040
   - Chapter 7 – Noise Element
5. Map N-3 – Future Noise Contours
   - Final Environmental Impact Report City of Moreno Valley General Plan 2040
   - Section 4.13 – Noise
   - Figure 413-3– March Air Reserve Base Noise Contours
6. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.140 Noise and Sound
7. Moreno Valley Municipal Code Chapter 11.80 Noise Regulations
8. March Air Reserve Base (MARB)/March Inland Port (MIP) Airport Land Use Compatibility Plan (ALUCP), (http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700)

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	☐	☐	☒	☐

Response: The Project would result in development of the subject property with industrial land uses that would expand employment opportunities in the City of Moreno Valley. It is anticipated that the employment base for both the construction and operational phases of the Project would come from the existing population in the Inland Empire, which comprises western Riverside County and southwestern San Bernardino County. According to the Bureau of Labor Statistics, the Riverside-San Bernardino-Ontario region's civilian labor force contains approximately 2,161,532 persons with approximately 2,038,915 persons employed and 122,617 persons unemployed (approximately 5.7 percent unemployment rate) (USBLS, 2022). Accordingly, the Project region already contains an ample supply of potential employees under existing conditions and the Project's labor demand is not expected to draw substantial numbers of new residents to the area. Furthermore, approximately 86 percent of the City's residents commute outside of the City for work (SCAG, 2019, p. 21); therefore, the Project would provide job opportunities closer to home for existing and future Moreno Valley residents.

The Project would install new/expanded infrastructure; however, this infrastructure would either be master-planned facilities (meaning the facilities would be installed with or without the Project), upgrades to existing facilities that are needed to correct service deficiencies (meaning that the quality of existing service would improve but no additional system capacity would be added), or would be private facilities for the sole use of the Project (meaning they would not be available for general public use). Accordingly, no significant indirect impacts associated with population growth would result from any Project-related improvements because the Project and its required improvements would not induce substantial growth on surrounding properties.

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

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

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

Sources:

1. Southern California Association of Governments (SCAG) – Profile of the City of Moreno Valley, https://scag.ca.gov/sites/main/files/file-attachments/morenovalley_localprofile.pdf?1606013528
2. United States Bureau of Labor Statistics – Riverside-San Bernardino-Ontario, CA Economy at a Glance, https://www.bls.gov/eag/eag.ca_riverside_msa.htm#eag_ca_riverside_msa.f.p

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

Response: Fire protection services to the Project Site are provided by the Moreno Valley Fire Department (MVFD). The Project Site is served by the Towngate Fire Station (Station No. 6) located at 22250 Eucalyptus Avenue, approximately 1.4 roadway miles to the northeast of the Project Site. Based on the Project Site's proximity to existing fire protection facilities, the Project is expected to be adequately

served by existing fire protection services, and no new or expanded facilities would be required. The Project Applicant is required to comply with the provisions of the City of Moreno Valley's Development Impact Fee (DIF) Ordinance (Ordinance No. 695), which requires a fee payment that the City applies to the funding of fire protection facilities. The City will collect DIF from the Project Applicant at the time of building permit issuance (based on building square footage). The Project's payment of DIF, as well as increased tax revenues that would result from development of the Project, would be used by the City to help pay for fire protection services and other public services.

The Project would incorporate fire prevention and fire suppression design features to minimize the potential demand placed on the MVFD. The proposed warehouse distribution buildings would be of concrete tilt-up construction. Concrete is non-flammable and concrete tilt-up buildings have a lower fire hazard risk than wood-frame construction. The Project also would install fire hydrants on-site and would provide paved primary and secondary emergency access to the Project Site to support the MVFD in the event fire suppression activities are needed on-site. Lastly, the proposed warehouse distribution building would be equipped with fire sprinklers in accordance with the California and Moreno Valley building codes. Based on its size and scale, the proposed building would likely feature Early Suppression, Fast Response (ESFR) ceiling mounted fire sprinklers (or a comparable fire suppression system) that exceed the fire protection of traditional sprinkler systems. ESFR high output, high volume systems are in ceiling spaces as with conventional fire sprinkler systems, but they incorporate large, high-volume, high-pressure heads to provide the necessary fire protection for industrial buildings that may contain high-piled storage. While most other sprinklers are intended to control the growth of a fire, an ESFR sprinkler system is designed to suppress a fire. To suppress a fire does not necessarily mean it will extinguish the fire but rather it is meant to "knock" the fire back down to its source, making it more manageable for the MVFD to extinguish.

Based on the foregoing, the Project incorporates several design features to minimize fire hazards. Additionally, the Project would receive adequate fire protection service and would not result in the need for new or physically altered fire protection facilities and the Project Applicant would pay DIF and the Project would generate other revenues (e.g., tax) that would help offset the Project's demand for fire protection services. Impacts to fire protection facilities would be less than significant.

ii) Police protection?	☐	☐	☒	☐

Response: The Project would introduce two new buildings and employees to the Project Site, which would result in an incremental increase in demand for police protection services but is not anticipated to require or result in the construction of new or physically altered police facilities. Furthermore, prior to the issuance of building permits, the Project Applicant would be required to comply with the provisions of Moreno Valley's Development Impact Fee (DIF) Ordinance (Ordinance No. 695) (City of Moreno Valley, 2021d). This ordinance requires a fee payment that the City applies to the funding of public facilities, including police protection facilities. The City will collect the Project's DIF share from the Project Applicant at the time of building permit issuance (based on building square footage). The Project's payment of DIF fees, as well as increased tax revenues that would result from development of the Project, would be used by the City to help pay for police protection services and other public services. Based on the foregoing, the Project would receive adequate police protection service, and would not result in the need for new or physically altered police protection facilities. Impacts to police protection facilities would therefore be less than significant.

iii) Schools?	☐	☐	☒	☐

Response: Implementation of the Project would not create a direct demand for public school services, as the subject property would contain non-residential uses and would not generate any school-aged children requiring public education. The addition of employment-generating uses on the Project Site would assist the City in achieving its goal to provide a better jobs/housing balance within the City and the larger western Riverside County region; therefore, the Project is not expected to draw a substantial number of new residents to the region and would therefore not indirectly generate school-aged students requiring public education. Because the Project would not directly generate students and is not expected to indirectly draw students to the area, the Project would not cause or contribute to a need to construct new or physically altered public school facilities. Although the Project would not create a demand for additional public-school services, the Project Applicant would be required to contribute development

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
impact fees to the Moreno Valley Unified School District in compliance with California Senate Bill 50 (Greene) (CA Legislative Info., 1998), which allows school districts to collect fees from new developments to offset the costs associated with increasing school capacity needs. Mandatory payment of school fees would be required prior to the issuance of building permits. Impacts to public schools would be less than significant.				
iv) Parks?	☐	☐	☐	☒
Response: As discussed under Responses XVI(a) and XVI(b) below, the Project would not create a demand for public park facilities and would not result in the need to modify existing or construct new park facilities. Accordingly, implementation of the Project would not adversely affect any park facility. Thus, no impact would occur.				
v) Other public facilities?	☐	☐	☐	☒
Response: The Project is not expected to result in a demand for other public facilities/services, including libraries, community recreation centers, post offices, and/or animal shelters. As such, implementation of the Project would not adversely affect other public facilities or require the construction of new or modified public facilities and no impact would occur.				
Sources: 1. City of Moreno Valley Municipal Code Chapter 3.42 "Commercial and Industrial Development Impact Fees" – https://library.qcode.us/lib/moreno_valley_ca/pub/municipal_code/item/title_3-chapter_3_42 2. Ordinance 695 California Legislative Information – Senate Bill 50 (Greene), http://www.leginfo.ca.gov/pub/97-98/bill/sen/sb_0001-0050/sb_50_bill_19980827_chaptered.html				
XVI. RECREATION – Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
Response: The Project would develop the subject property with industrial land uses. The Project does not propose any type of residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. Accordingly, implementation of the proposed Project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park, thus, no impact would occur.				
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	☐	☐	☐	☒
Response: The Project does not propose to construct any new on- or off-site recreation facilities. Additionally, the Project would not expand any existing off-site recreational facilities. Therefore, environmental effects related to the construction or expansion of recreational facilities would not occur.				
Sources: 1. Project Application Materials – Site Plan				
XVII. TRANSPORTATION – Would the project:				
a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
Response: In accordance with City policy, as established by the City's *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment* ("Transportation				

Guidelines," June 2020), the City utilizes a screening threshold of 100 two-way peak hour trips (both actual and PCE trips) to determine whether a development project has the potential to program plan, ordinance or policy addressing the circulation system that would require a detailed analysis of project-related traffic volumes and circulation patterns (City of Moreno Valley, 2020, p. 3). When a development project would generate more than 100 peak hour trips, the City considers that project to be a contributor of substantial traffic to local roadways and requires additional analysis to determine whether the traffic generated by that development project would conflict with City plans, ordinances, and/or policies related to the circulation system. However, where there are no unique circumstances that suggest unacceptable traffic conditions – such as an existing safety problem or substandard operations at nearby intersection or street – and a development project contributes less than 100 peak hour trips, the City has determined that such projects would clearly have no conflict with City plans, ordinances, and policies addressing the circulation system.

A *Trip Generation Assessment* (*Technical Appendix K1*) was prepared for the Project by Urban Crossroads. According to the *Trip Generation Assessment*, the Project is calculated to generate 67 morning (AM) peak hour trips and 59 evening (PM) peak hour trips. When converted to "passenger car equivalent" (PCE), which weights all classifications of vehicles – including heavy trucks with multiple axles – to allow comparison under a single metric, the Project is calculated to generate 68 PCE AM peak hour trips and 60 PCE PM peak hour trips. (Urban Crossroads, 2022e, p. 2) The City has reviewed the Project's design proposal and reviewed traffic operations in the surrounding area and determined that: 1) the Project would not introduce any design features that would create an unsafe or adverse traffic condition in the area; 2) there are no existing safety problems in the Project vicinity; and 3) there are no substandard traffic facilities in the Project area.

In addition, the Project would not conflict with applicable objectives from the Moreno Valley General Plan Circulation Element, including Policies C.2-3, C.2-5, C.2-7, C.3-4, C.3-6, and C.4-4, or with the City's Bicycle Master Plan. Due to the Project's consistency with the Moreno Valley General Plan – which SCAG uses as the foundation for its regional land use planning program – as well as the Project Site's geographic location in proximity to major local and regional truck routes, the Project would not conflict with the goals and policies of *Connect SoCal*, including the following goals related to vehicular and non-vehicular circulation: 1) Increasing mobility, accessibility, reliability, and travel safety for people and goods; 2) Enhancing the preservation, security, and resilience of the regional transportation system; 3) Increasing person and goods movement and travel choices within the transportation system; 4) Adapt to a changing climate and support an integrated regional development pattern and transportation network; and 5) Leveraging new transportation technologies and data-driven solutions that result in more efficient travel.

Based on the foregoing analysis, the City determines that the Project would not conflict with applicable plans, ordinances, or policies addressing the circulation system and impacts would be less than significant.

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

Response: CEQA Guidelines Section 15064.3, Subdivision "b" establishes criteria for evaluating a project's transportation impacts using vehicle miles traveled (VMT) metric. As of July 1, 2020, the automobile delay-based "level of service" (LOS) analysis framework that was historically used as the basis for determining transportation impacts was replaced across the State with a VMT-based framework. The City's Transportation Guidelines, which were adopted in June 2020, establish a VMT analysis methodology and evaluation criteria for development projects that is consistent with CEQA Guidelines Section 15064.3, Subdivision "b." A *Vehicle Miles Traveled (VMT) Screening Evaluation* (VMT Analysis) was prepared for the Project by Urban Crossroads. The VMT Analysis is included as *Technical Appendix K2* to this Initial Study.

As required by the City's Transportation Guidelines, the Project was first evaluated against screening criteria to determine if could be clearly shown that implementation of the Project would not generate substantial VMT – and, therefore, be consistent with CEQA Guidelines Section 15064.3 – or if additional analysis would be required to fully evaluate the significance of Project-related VMT. One of the screening

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
criteria in the City's Transportation Guidelines is the "Low VMT Area" criteria, which identifies "efficient" geographic areas in the County – due to proximity to established population centers and/or transportation infrastructure – where development would result in low VMT per person/employee. Development within "Low VMT Areas" is considered beneficial in comparison to development within less developed areas due to the relative ease of access to these areas. The traffic analysis zone (TAZ) where the Project Site is located was found to meet the criteria of a "Low VMT Area" (Urban Crossroads, 2022f, pp. 2-3). Thus, because the Project meets the "Low VMT Area" screening threshold, the Project is clearly presumed to not cause or contribute to a substantial increase in the total citywide and/or regional VMT under the City's Transportation Guidelines. Accordingly, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision "b;" 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: The types of traffic generated during operation of the Project (i.e., passenger cars and trucks) would be compatible with the type of traffic observed along study area roadways under existing conditions. All proposed improvements within the public right-of-way would be installed in conformance with City design standards. If any component of Project construction would occur in the public right-of-way and require the partial or full closure of a sidewalk and/or travel lane, all work would be required to adhere to the applicable construction control practices that are specified in the State of California *Department of Transportation Construction Manual*, dated January 2021 and published by Caltrans, to minimize potential safety hazards. The City reviewed the Project's application materials and determined that no hazardous transportation design features would be introduced within the City public right-of-way through implementation of the Project. Based on the foregoing information, the Project's construction and operation would not create or substantially increase safety hazards due to a design feature or incompatible use. Impacts would be less than significant.				
d) Result in inadequate emergency access?	☐	☐	☒	☐
Response: The City of Moreno Valley reviewed the Project's design and confirmed that the Project's driveways and internal drive aisles provide adequate access to-and-from the Project Site for emergency vehicles. In addition, the City will review all future Project construction drawings as part of the building permit review and approval process to ensure that adequate emergency access is maintained along abutting public streets during construction activities. Specifically, all Project construction materials and equipment would be stored/staged on the Project Site and would not interfere with emergency vehicles traveling along Old 215 Frontage Road or Edgemont Street. Any Project construction activities that would occur within the Old 215 Frontage Road and Edgemont Street and requires a partial or full closure of a sidewalk or vehicle travel lane would require a traffic control plan that complies with the *California Manual on Uniform Traffic Control Devices* and that must be approved by the City of Moreno Valley to ensure that emergency response is not adversely affected. Based on the Project's design and required adherence to City requirements for emergency vehicle access, a less than significant impact would occur.				

Sources:

1. City of Moreno Valley Transportation Engineering Division – Transportation Impact Analysis Preparation Guide for VMT and Level of Service, https://www.moval.org/city_hall/departments/pub-works/transportation/TIA-Guidelines.pdf
2. Southern California Association of Governments – Connect SoCal https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176
3. Urban Crossroads, Inc. 2022e. *Cottonwood & Edgemont Warehouse Trip Generation Assessment*. (Technical Appendix K1)
4. Urban Crossroads, Inc. 2022f. *Cottonwood & Edgemont Warehouse Vehicle Miles Traveled Screening Evaluation*. (Technical Appendix K2)
5. Moreno Valley Master Bike Plan, adopted January 2015

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☒
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: There are no resources on the Project Site that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined by Public Resources Code Section 5020.1(k) (BFSA, 2022a, pp. 5.0-2 and 5.0-3). Accordingly, implementation of the Project would not impact a tribal cultural resource that is listed or eligible for listing on a register of historical resources.

As part of the AB 52 consultation process required by State law, the City sent notification of the Project to Native American tribes with possible traditional or cultural affiliation to the Project area. No Native American tribes contacted the City to request formal consultation. Notwithstanding, due to the Project site's location in an area where multiple Native American tribes are known to have a cultural affiliation, there is the possibility that prehistoric archaeological resources, including tribal cultural resources, could be encountered during ground-disturbing construction activities – although this is considered unlikely due to the pervasive, historic and on-going disturbances that have occurred on the Project site. Were a tribal cultural resource, as defined in Public Resources Code Section 21074, to be found on the Project site during construction – and not protected – a significant impact would occur.

Implementation of MMs CR-1 and MM CR-3 through CR-9, would ensure the proper identification and subsequent treatment of any significant tribal cultural resources that may be encountered during ground-disturbing activities associated with Project development. With implementation of the required mitigation, the Project's potential impact to significant tribal cultural resources would be reduced to less-than-significant.

Sources:

1. Brian F. Smith and Associates (BFSA), *Phase I Cultural Resources Survey of the Cottonwood & Edgemont Project*, (Technical Appendix C)

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

Response: The Project would construct an on-site network of water, sewer, and storm drain infrastructure and, also, would make upgrades to existing off-site water and storm drainage systems. The Project includes off-site water line improvements within paved rights of way for Old 215 Frontage Road consisting of 900 linear feet of upgraded water lines and Cottonwood Avenue consisting of 730

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
linear feet of upgraded water lines. Moreover, the Project includes the off-site construction of a new storm drain line connection between the Project Site and the Edgemont Channel. The Project also provides for the construction of a new outlet within the Edgemont Channel to receive Project flows. The Project would involve utility connections to provide electric power and telecommunications services to the Project Site; connections would be made to existing facilities abutting the Site. Existing above-ground power lines located at the Project Site's frontage with Old 215 Frontage Road would be undergrounded as part of Project construction. The Project Applicant does not anticipate the need to provide natural gas service to the Project Site (although Project natural gas usage was assumed in the air quality, energy, and greenhouse gas analyses presented earlier in the Initial Study as a conservative measure). The construction of proposed utility improvements has the potential to result in environmental effects associated with short-term air pollutant emissions, noise emissions, water quality effects, and traffic movement disruptions that are an inherent part of the Project's construction process. However, these impacts already were included in the construction-level impact analysis provided under Sections III, X, XII, and XVII of this Initial Study and, where significant construction-related impacts are identified under these sections, feasible and enforceable mitigation measures are imposed by this Initial Study to reduce the Project's impacts to less-than-significant levels. There are no significant environmental impacts specifically related to the construction of the Project's proposed utility connections/improvements.				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
Response: The BSMWC is responsible for supplying potable water to the Project Site and its 430-acre service area. BSMWC receives approximately 60% of its supply from groundwater and purchases approximately 40% of its supply from the Western Municipal Water District (WMWD). The BSMWC is not known to have any issues with its existing or projected future water supply and the WMWD is projected to have adequate water supplies available to meet WMWD's estimated water demand through 2045 under normal, historic single-dry and historic multiple-dry year conditions (WMWD, 2021, pp. 6-6 - 6-11). The BSMWC and WMWD rely on regional growth projections from agencies like SCAG (and these regional growth projections rely on adopted land use maps from local general plans). Because the Project would be consistent with the City's General Plan land use designation for the Project Site, the water demand associated with the Project was considered by the local water agencies when projecting future demands. Thus, local water providers would have sufficient water supplies available to serve the Project from existing entitlements/resources and no new or expanded entitlements are needed. The Project's impact would be less than significant.				
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
Response: Wastewater generated by the Project would be conveyed by the ECSD, which is under contract with the City of Riverside and transmits sewage to the City of Riverside's Regional Water Quality Control Plant (RWQCP). Based upon ECSD's wastewater generation rate of 2,000 gpd per acre for commercial/industrial uses, the Project is calculated to generate approximately 15;880 gpd of wastewater requiring treatment (ECSD, 2016, Table 3-1). Wastewater generated within the ECSD service area is conveyed to the City of Riverside Regional Water Control Plant (RWQCP). Under existing conditions, the City of Riverside's RWQCP has an excess treatment capacity of approximately 18.6 million gallons per day (mgpd) (46 mgpd treatment capacity – 27.4 mgpd influent flows = 18.6 million gallons excess treatment capacity) (City of Riverside, 2019, Vol. 4, pp. 1-1 & 1-2). Implementation of the Project would utilize approximately 0.09% of the City of Riverside's RWQCP daily excess treatment capacity. Accordingly, the City of Riverside's RWQCP has sufficient capacity to treat wastewater generated by the Project in addition to existing commitments. The Project would not create the need for any new or expanded wastewater facility. Because there is adequate capacity at existing treatment facilities to serve the Project's projected sewer demand, 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
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

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

According the CalRecycle, the El Sobrante Landfill is permitted to receive 16,054 tons of refuse per day and has a total remaining capacity of 143,977,170 cubic yards; the El Sobrante Landfill is estimated to reach capacity, at the earliest time, in the year 2051 (CalRecycle, 2022a). In February 2022 (the most recent period for which disposal volumes are available), the average daily disposal at the El Sobrante Landfill was approximately 10,862 tons, which correlates to an excess daily disposal capacity of approximately 5,192 tons (CalRecycle, 2022b).

The analysis below summarizes the Project's potential to generate solid waste during construction and/or operation that would exceed the disposal capacity of local landfill facilities. As demonstrated in the analysis below, the Project would generate less-than-significant volumes of solid waste.

Construction Impact Analysis

Based on the United States Environmental Protection Agency's (U.S. EPA) construction waste generation factor of 4.34 pounds (lbs) of solid waste generated for the construction of every 1 s.f. for non-residential uses, Project construction is estimated to generate approximately 216 tons ([99,630 s.f. x 4.34 lbs/s.f.] ÷ 2,000 lbs/ton ≈ 216 tons) (EPA, 2003, Table A-2). CalGreen requires a minimum of 65% of all construction waste be diverted from landfills (by recycling, reusing, and other waste reduction strategies); therefore, the Project is estimated to generate approximately 75.6 tons of construction waste requiring landfill disposal (216 tons x 0.35 = 75.6 tons). The Project's construction phase is anticipated to last 193 workdays; therefore, the Project is estimated to generate approximately 0.39 tons of solid waste per day (75.6 tons ÷ 193 days = 0.39 tons per day) requiring disposal at a landfill during construction.

Non-recyclable construction waste generated by the Project would be disposed at the El Sobrante Landfill. As described above, this landfill receives, on average, below its maximum permitted daily disposal volume; thus, the relatively minimal construction waste generated by the Project is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. Project construction waste would represent less than one percent of the excess disposal capacity at the El Sobrante Landfill. Furthermore, the El Sobrante Landfill is not expected to reach its total maximum permitted disposal capacities during the Project's construction period. The El Sobrante Landfill and has sufficient daily capacity to accept solid waste generated by the Project's construction phase; therefore, impacts to landfill capacity associated with the Project's near-term construction activities would be less than significant.

Operational Impact Analysis

Based on a daily waste generation factor of 1.42 pounds of waste per 100 square feet of industrial building area obtained from the California Department of Resources Recycling and Recovery (CalRecycle), long-term, on-going operation of the Project would generate approximately 1.17 tons of solid waste per day ([1.42 pounds ÷ 100 s.f.] × 99,630 s.f.] ÷ 2,000 pounds = 0.71 tons per day). Pursuant to AB 939, at least 50 percent of the Project's solid waste is required to be diverted from landfills; therefore, the Project would generate approximately 0.36 tons of solid waste per day requiring landfilling (1.17 tons ÷ 2 ≈ 0.36 tons per day).

Non-recyclable solid waste generated during long-term operation of the Project would be disposed at the El Sobrante Landfill. As described above, this landfill receives, on average, below its maximum permitted daily disposal volume; thus, the relatively minimal construction waste generated by the Project is not anticipated to cause the landfill to exceed its maximum permitted daily disposal volume. Project construction waste would represent less than one percent of the excess disposal capacity at the El Sobrante Landfill. Furthermore, the El Sobrante Landfill is not expected to reach its total maximum

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
permitted disposal capacities during the Project's construction period. The El Sobrante Landfill and has sufficient daily capacity to accept solid waste generated by the Project's construction phase; therefore, impacts to landfill capacity associated with the Project's near-term construction activities would be less than significant.				
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Response: The California Integrated Waste Management Act (AB 939), signed into law in 1989, established an integrated waste management system that focused on source reduction, recycling, composting, and land disposal of waste. In addition, the bill established a 50 percent waste reduction requirement for cities and counties by the year 2000, along with a process to ensure environmentally safe disposal of waste that could not be diverted. Per the requirements of the Integrated Waste Management Act, the Riverside County Board of Supervisors adopted the County of Riverside Countywide Integrated Waste Management Plan (CIWMP), which outlines the goals, policies, and programs the County and its cities implement to create an integrated and cost-effective waste management system that complies with the provisions of AB 939 and its diversion mandates. (RCDWR, 2022)

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

Sources:

1. California Legislative Information – Public Resources Code § 42911 – California Solid Waste Reuse and Recycling Access Act of 1991, Effective January 1, 2005, https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=42911.
2. California Legislative Information – Assembly Bill 341 Solid Waste: Diversion, Approved October 5, 2011, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201120120AB341
3. City of Riverside, 2019. Update Of The Integrated Master Plan For The Wastewater Collection And Treatment Facilities, Volume 4. Available at: https://riversideca.gov/publicworks/sewer/master-plan/2019%20Sewer%20Master%20Plan%20Volume%204.pdf
4. Riverside County Department of Waste Resources – Countywide Integrated Waste Management Plan, 2022, https://www.rcwaste.org/business/planning/ciwmp
5. CalRecycle – SWIS Site/Facility Details: El Sobrante Landfill. Available at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2280?siteID=2402. Accessed October 19, 2020.
6. CalRecycle – Estimated Solid Waste Generation Rates. Available at: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates.

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

Response: According to the California Department of Forestry and Fire Protection (CalFire) and the City's General Plan, the Project Site is not identified as being within or located near a State responsibility area (SRA) or lands classified as very high fire hazard severity zone (VHFHZ) (City of Moreno Valley, 2021a, Map S-5; CalFire, 2022). Therefore, the Project would not exacerbate wildfire hazard risks or expose people or the environmental to adverse environmental effects related to wildfire. No impacts would occur.

Sources:

1. California Department of Forestry and Fire Protection (CalFire) – Fire Hazard Severity Zone Viewer, https://egis.fire.ca.gov/FHSZ/
2. Moreno Valley General Plan 2040
   - Chapter 6 – Safety Element
     - Map S-5 – Fire Hazard Severity Zones

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

Response: All impacts to the environment, including impacts to habitat for fish and wildlife species, fish and wildlife populations, plant and animal communities, rare and endangered plants and animals, and historical and pre-historical resources were evaluated as part of this Initial Study. Throughout this Initial Study, where impacts were determined to be potentially significant, mitigation measures have been imposed to reduce those impacts to less-than-significant levels. Accordingly, with incorporation of the mitigation measures imposed throughout this Initial Study, the Project would not substantially degrade the quality of 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
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.)?	☐	☒	☐	☐

Response: As discussed throughout this Initial Study, implementation of the Project would result in effects to the environment that are individually limited after the application of the mitigation measures imposed throughout this Initial Study. Notwithstanding, there is the potential that one or more of the Project's limited direct effects on the environment could be cumulatively considerable when considered with the environmental effects of other development projects. The analysis provided below evaluates the potential for the Project to have cumulatively considerable environmental impacts.

Aesthetics

The Project represents an infill re-development Project in an urban environment. The Project Site is in a developing area, with existing and under construction industrial land uses to the west of the Site. No scenic resources are located in the Project area with limited prominent views of distant landforms. All development in the immediate vicinity of the Project would be required to comply with the development regulations and design standards contained in the City's Municipal Code, which would ensure that minimum standards related to visual character and quality are met to preclude adverse aesthetic effects (e.g., size, scale, building materials, lighting). Accordingly, the Project's aesthetic impacts would not be cumulatively-considerable.

Agriculture and Forestry Resources

The Project result in no impact on agricultural and forestry resources. Therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact under this topic.

Air Quality

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

Biological Resources

The Project Site does not support any sensitive plant or wildlife species, riparian, or sensitive natural habitat, or federally-protected wetlands; therefore, there is no potential for the Project to contribute to a cumulatively-considerable impact under these resources. Although the Project Site is highly disturbed and fragmented from other open space areas under existing conditions, the Project Site does contain habitat for nesting birds. Therefore, there is the potential that nesting birds could be present on the Project Site prior to construction and there also is the potential that other development project sites in the Project area also could support bird nests. The Project's potential impacts to nesting birds would be cumulatively considerable. MMs BR-1 would reduce the Project's cumulative effects to less-than-significant levels.

Cultural Resources

Implementation of the Project has the potential to impact masked/buried historic and/or prehistoric archaeological resources on the Project Site and, therefore, would result in a significant cumulative impact in the event any of such resources were found on-site during construction. MMs CR-1 through CR-9 would require the Project Applicant to implement monitoring and recovery programs in conformance with accepted protocols for historic and prehistoric archaeological resources in the event these resources are found during Project construction. With implementation of MMs CR-1 through CR-9, potential cumulative impacts would be reduced to less-than-significant levels.

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

Energy

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

Geology and Soils

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

Notwithstanding the information above, there is the potential for the Project to contribute to the cumulative loss of important fossil resources in the region. Although development of the Project Site would not impact any known paleontological resources, the Project Site is underlain by alluvial and alluvial fan deposits with a high paleontological sensitivity for large, terrestrial Ice Age vertebrates. Other projects within the region atop similar alluvial and alluvial fan deposits also could have the potential to impact unknown, subsurface paleontological resources during ground-disturbing activities. Therefore, the potential for development on the Project Site to impact subsurface paleontological resource deposits is a cumulatively-considerable impact. Application of MMs GEO-1 through GEO-4 would reduce the Project's cumulative impacts to a less-than-significant level.

Greenhouse Gas Emissions

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

Hazards and Hazardous Materials

Potential effects related to hazards and hazardous materials are inherently site-specific and related to conditions that exist on an individual property or potential operations. Furthermore, federal, State, and local regulations are in place to ensure proper handling, transport, storage, and use of hazardous materials and preclude significant impacts under this topic.

Hydrology and Water Quality

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

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

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

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

Noise
Noise levels diminish rapidly with distance; therefore, for a development project to contribute to a noise-related cumulative impact it must be located in close proximity to another development project or source of substantial noise. There are no known active, pending, or planned construction projects in the immediate vicinity of the Project Site that would overlap with the Project's proposed construction schedule. Although the Project Site is adjacent to active construction projects on the west side of Old 215 Frontage Road, simultaneous construction of the Project and these other development projects is not expected to occur because the Project is substantially "behind" these other development proposals as the Project still needs to complete the City's discretionary review process before being considered for approval by the City's decision-makers (and, if approved, would still require the City's review and issuance of construction permits). The proposed Old 215 Industrial Park project is not expected to result in substantial cumulative construction noise – although its construction may overlap with the Project – because the Old 215 Industrial Park project site is located approximately 0.25-mile south of the Project Site without a clear line of sight to the Project Site. Due to attenuation from distance and intervening development, construction noise from the Old 215 Industrial Park project would not result in considerable cumulative effects at sensitive receptors near the Project Site.

Under long-term operating conditions, the Project would comply with the City of Moreno Valley noise ordinance and would not produce substantial noise or noticeable vibration at the Project Site; all nearby development projects would similarly be required to comply with applicable noise and vibration control regulations, which would avoid a cumulatively considerable impact.

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

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

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

Transportation
The Project would not conflict with any City policies addressing the circulation network and would not generate VMT that would have the potential to contribute to a substantial increase in the total citywide or regional VMT. Therefore, implementation of the Project would not contribute to any adverse, cumulatively considerable transportation effects.

Tribal Cultural Resource
Development activities of the Project Site would not impact any known tribal cultural resources. However, there is the remote potential that such resources are buried beneath the surface of the Project Site and

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

could be impacted during construction. Other projects within region would similarly have the potential to impact unknown, subsurface tribal cultural resources during ground-disturbing activities. Therefore, the potential for development on the Project Site to impact subsurface tribal cultural resource deposits is a cumulatively considerable impact. Application of MMs CR-1 and MM CR-3 though CR-9 would reduce the Project's cumulative impacts to less-than-significant levels.

Utilities and Service Systems

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

Wildfire

The Project Site is not located in of within proximity to an SRA or very high fire hazard area. Therefore, implementation of the Project would result in no adverse impacts associated with wildfire.

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

Response: The Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this Initial Study. In instances where the Project has potential to result in direct or indirect adverse effects to human beings (air quality and associated effects on human health from air pollutants, and construction-related noise and potential effects on hearing impairment), project design feature best practices and mitigation measures have been applied to ensure impacts to not rise above a level of significance. With required implementation of project design features and the mitigation measures identified in this Initial Study, construction and operation of the proposed Project would not involve any activities that would result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

Mitigation Monitoring and Report Program (MMRP)

Cottonwood & Edgemont Project
Moreno Valley, California

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

Applicant
CDRE Holdings 21 LLC
523 Main Street
El Segundo, CA 90245

CEQA Consultant
T&B Planning, Inc.
3200 El Camino Real, Suite 100
Irvine, CA 92602

Lead Agency Discretionary Permits
Master Plot Plan (PEN21-0325)
Plot Plan (PEN20-0326)
Tentative Parcel Map (PEN20-0327)

February 2023

Impact	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
Biological Resources					
Threshold a & d: There is potential for the Project to impact protected nesting birds and migratory birds.	**MM BR-1:** As a condition of approval for all grading permits, vegetation clearing and ground disturbance shall be prohibited during the migratory bird nesting season (February 1 through September 15), unless a migratory bird nesting survey is completed in accordance with the following requirements: a) A migratory nesting bird survey of the project's impact footprint shall be conducted by a qualified biologist within (3) days prior to initiating vegetation clearing or ground disturbance. b) A copy of the migratory nesting bird survey results report shall be provided to the City of Moreno Valley Planning Division. If the survey identifies the presence of active nests, then the qualified biologist shall provide the City of Moreno Valley Planning Division with a copy of maps showing the location of all nests and an appropriate buffer zone around each nest sufficient to protect the nest from direct and indirect impact. The size and location of all buffer zones, if required, shall be subject to review and approval by the City of Moreno Valley Planning Division and shall be no less than a 300-foot radius	Project Biologist	City of Moreno Valley Planning Division	Within three (3) days prior to initiating vegetation clearing or ground disturbance	Less than significant with mitigation incorporated

Impact	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
	around the nest for non-raptors and a 500-foot radius around the nest for raptors. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist and City Planning Division verify that the nests are no longer occupied and the juvenile birds can survive independently from the nests.				
Cultural Resources					
Threshold a: There is potential for buried historical deposits to be present on the Project site. **Threshold b:** There is potential for significant archaeological resources to be unearthed during ground-disturbing activities associated with Project construction.	**MM CR-1:** Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all ground disturbing activities. The Project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist, in consultation with the contractor and the City, shall develop a CRMP as defined in Mitigation Measure CR-3. The Project Archaeologist 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	Project Developer; Project Archaeologist	City of Moreno Valley Planning Division	Prior the issuance of a grading permit	Less than significant with mitigation incorporated

Impact	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
	in attendance. The archaeological monitor 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 **MM CR-3:** The Project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a CRMP in consultation pursuant to the definition in AB52 to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting Tribe is defined as a Tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of the AB52 consultation process, and has completed AB 52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include: a) Project description and location; b) Project grading and development scheduling; c) Roles and responsibilities of individuals on the Project; d) The pre-grading meeting and Cultural Resources Worker Sensitivity Training details; e) The protocols and stipulations that the contractor, City, Consulting Tribe (s) and Project	Project Archaeologist	City of Moreno Valley Planning Division	Prior the issuance of a grading permit	

Impact	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
	archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation; f) The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items; and g) Contact information of relevant individuals for the Project. **MM CR-4**: In the event that Native American cultural resources are discovered during the course of ground disturbing activities (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries: a) One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Moreno Valley Planning Department: i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place they were found with no development affecting the integrity of the resources.	Project Developer; Project Archaeologist	City of Moreno Valley Planning Division	In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries)	

Impact	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
	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 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 Mitigation Measure CR-3 The location for the future reburial area shall be identified on a confidential exhibit on file with the City, and concurred to by the Consulting Native American Tribal Governments prior to certification of the environmental document.				
	MM CR-5: The City shall verify that the following note is included on the Grading Plan: "If any suspected archaeological resources are discovered during ground –disturbing activities and the Project Archaeologist 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	Project Developer; Project Archaeologist	City of Moreno Valley Planning Division and Land Development Division	Prior to the issuance of a grading permit	

Impact	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
	Tribal Representatives to the site to assess the significance of the find." **MM CR-6:** If potential historic or cultural resources are uncovered during excavation or construction activities at the project site that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, all ground disturbing activities in the affected area within 100 feet of the uncovered resource must cease immediately and a qualified person meeting the Secretary of the Interior's standards (36 CFR 61), Tribal 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. Further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional archeologist and Tribal Monitors, if needed. Determinations and recommendations by the consultant shall be immediately submitted to the Planning Division for consideration, and implemented as deemed appropriate by the Community	Project Developer; Project Archaeologist	City of Moreno Valley Planning Division	In the event that cultural resources are discovered during the course of grading (inadvertent discoveries)	

Impact	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
	Development Director, in consultation with the State Historic Preservation Officer (SHPO) and any and all Consulting Native American Tribes as defined in CR-2 before any further work commences in the affected area. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archeologist, in consultation with the Tribe, and shall be submitted to the City for their review and approval prior to implementation of the said plan.				
	MM CR-7**:** 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)	Project Construction Contractor, County Coroner	City of Moreno Valley Planning Division and Land Development Division	If human remains are discovered	
	MM CR-8: It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human	Project Developer, County Coroner	City of Moreno Valley Planning Division and Land	If human remains are discovered	

Impact	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
	remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 6254 (r)., parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 6254 (r).		Development Division		
	MM CR-9: Prior to final inspection, the developer/permit holder shall prompt the Project Archeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the	Project Developer; Project Archaeologist	City of Moreno Valley Planning Division and Land Development Division	Prior to final inspection	

Impact	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
	Eastern Information Center (EIC) at the University of California Riverside (UCR) and one (1) copy shall be submitted to the Consulting Tribe(s) Cultural Resources Department(s).				
Geology and Soils					
Threshold f: There is potential for Project-related grading activities to uncover and impact paleontological resources.	**MM GEO-1:** Prior to the issuance of a grading permit, the Project Applicant shall provide evidence to the City of Moreno Valley that a qualified paleontologist has been retained by the Project Applicant to conduct monitoring of excavation activities and has the authority to halt and redirect earthmoving activities in the event that suspected paleontological resources are unearthed.	Project Applicant; Project Construction Contractor; Project Paleontologist	City of Moreno Valley Planning Division	Prior to the issuance of a grading permit	Less than significant with mitigation incorporated
	MM GEO-2: The paleontological monitor shall conduct full-time monitoring during mass grading, trenching, and excavation operations in undisturbed, very old alluvial fan sediments that occur at depths between 1-5 feet below the existing ground surface on the Project Site. The paleontological monitor shall be equipped to salvage fossils if they are unearthed to avoid construction delays and to remove samples of sediments that are likely to contain the remains of small fossil invertebrates and vertebrates. The paleontological monitor shall be empowered to temporarily halt or divert equipment to allow of removal of abundant and large specimens in a timely manner. Monitoring may be	Project Applicant; Project Construction Contractor; Project Paleontologist	City of Moreno Valley Planning Division	Concurrent with grading activities	

Impact	Mitigation Measure (MM)	Responsible Party	Monitoring Party	Implementation Stage	Level of Significance
	reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified paleontological personnel to have a low potential to contain or yield fossil resources.				
	MM GEO-3: Recovered specimens shall be properly prepared to a point of identification and permanent preservation, including screen washing sediments to recover small invertebrates and vertebrates, if necessary. Identification and curation of specimens into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage, such as the Western Science Museum in Hemet, California, is required for significant discoveries.	Project Applicant; Project Construction Contractor; Project Paleontologist	City of Moreno Valley Planning Division	Prior to grading permit final inspection	
	MM GEO-4: A final monitoring and mitigation report of findings and significance shall be prepared, including lists of all fossils recovered, if any, and necessary maps and graphics to accurately record the original location of the specimens. The report shall be submitted to the City of Moreno Valley prior to building final.	Project Applicant; Project Construction Contractor; Project Paleontologist	City of Moreno Valley Planning Division	Prior to building final	