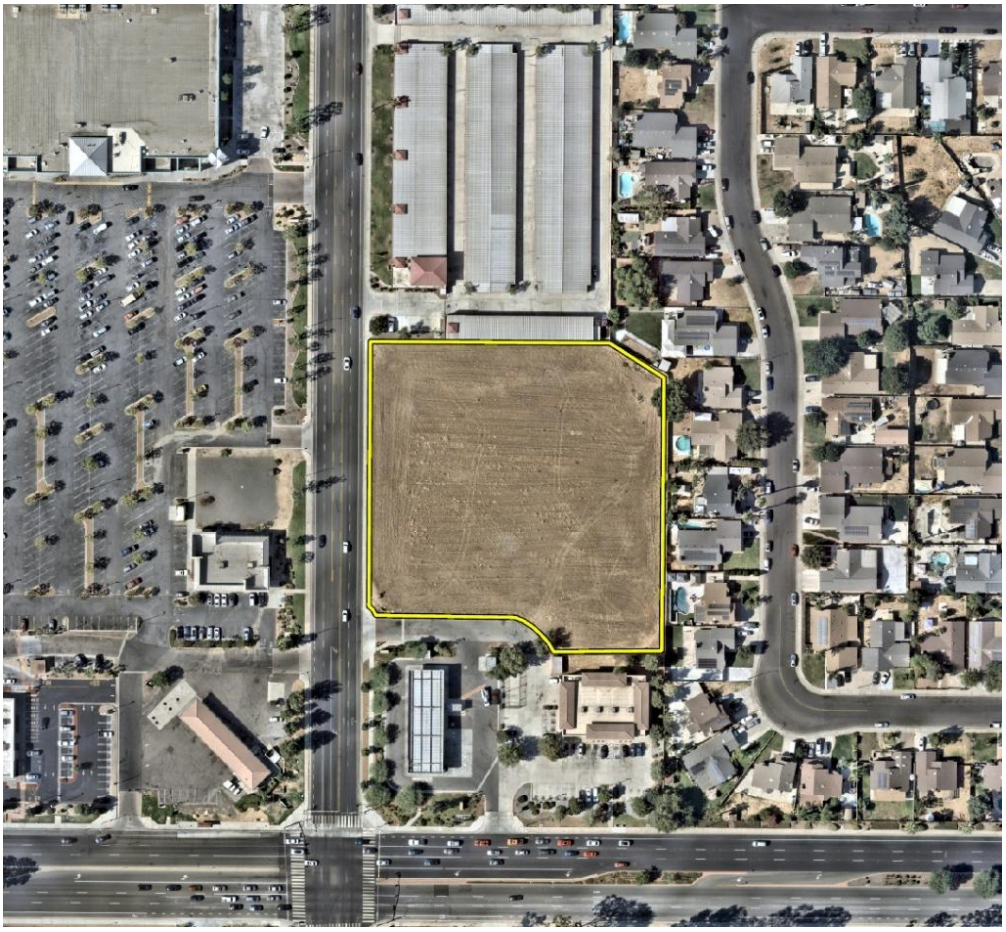
CITY OF MORENO VALLEY

DRAFT INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION FOR PUBLIC STORAGE MORENO VALLEY



Public Storage Moreno Valley Project (City Case No. PEN24-0154, PEN24-0155)

April 2026

Lead Agency
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MITIGATED NEGATIVE DECLARATION

Project Name: Public Storage Moreno Valley Project

Project Location: The Public Storage Moreno Valley Project (project) site is located in Township 3S, Range 3W, Section 7 of the *Sunnymead, California,* United States Geological Survey (USGS) 7.5-minute quadrangle map of the San Bernardino Baseline and Meridian. The project site (Assessor's Parcel Number [APN] 482-190-022) is located along Indian Street, north of Alessandro Boulevard in Moreno Valley, Riverside County, California. The project site is bounded by self-storage uses to the north, residential uses to the east, commercial uses (gasoline station and auto parts store) to the south, and Indian Street and commercial/retail uses to the west. Figure 1 depicts the regional and project locations. State Route 60 (SR-60) is located approximately 1.5 miles north of the project site, and Interstate 215 (I-215) is located approximately 3 miles west of the project site.

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

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

Mitigation Measures:

No.	Mitigation Measure
	Air Quality
MM AIR-1	During construction of the proposed project, the project contractor shall ensure all off-road diesel-powered construction equipment of 50 horsepower or more that are used for project construction meet, at a minimum, the California Air Resources Board Tier 2 emissions standards equipped with Level 3 Diesel Particulate Filters or the equivalent.
	Biological Resources
MM BIO-1	A nesting bird pre-construction survey shall be conducted by a qualified biologist three days prior to ground-disturbing activities if working within the bird nesting season (January 1 through August 31). Should nesting birds be found, an exclusionary buffer shall be established by the qualified biologist. The buffer may be up to 500 feet in diameter depending on the species of nesting bird found. This buffer shall be clearly marked in the field by construction personnel under guidance of the qualified biologist and construction or clearing shall not be conducted within this zone until the qualified biologist determines that the young have fledged, or the nest is no longer active. If there is a lapse in construction activities longer than seven days, an additional pre-construction survey shall be conducted.

No.	Mitigation Measure
	Cultural Resources
MM CUL-1	Prior to the start of earth moving activities, the Project Applicant shall retain an archaeologist to conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of precontact or historic archaeological resources or human remains. The Project Applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. This measure shall be implemented to the satisfaction of the City of Moreno Valley, Planning Division.
MM CUL-2	A qualified professional archaeologist (either an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archeology or an archaeologist supervised by such an archaeologist) shall monitor all construction-related ground-disturbing activities. Archaeological monitoring shall occur during these excavation activities until the Project Archaeologist, based on their observations, is satisfied that there is little likelihood of encountering intact archaeological deposits. The Project Archaeologist may also determine that it is appropriate to reduce monitoring to spot-checking on a part-time basis.
	Geology and Soils
MM GEO-1	If paleontological resources (fossils) are discovered during project grading, work shall be halted within 100 feet of the find until a qualified paleontologist assesses the significance of the find. Work occurring outside of the 100-foot buffer zone may continue. The project paleontologist shall monitor remaining earthmoving activities at the project site and shall be equipped to record and salvage fossil resources that may be unearthed during grading activities. The paleontologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. Any fossils found shall be evaluated in accordance with the *State CEQA Guidelines* and offered for curation at an accredited facility approved by the City of Moreno Valley. Once grading activities have ceased or the paleontologist determines that monitoring is no longer necessary, monitoring activities shall be discontinued. This measure shall be implemented to the satisfaction of the City Planning Division.

No.	Mitigation Measure
	Noise
MM NOI-1	**Construction Vibration Assessment.** Due to the close proximity to surrounding structures, the City of Moreno Valley (City) Director of Community Development, their designee, and the Developer/Applicant shall verify prior to issuance of grading permits that the approved plans require that the construction contractor shall implement the following reduction measures during project construction activities to ensure that damage does not occur at surrounding structures: • The first step in the Vibration Assessment should be a determination if any structures are within 15 feet of potential heavy construction activities. If is determined that no structures meet this criteria, no further effort is necessary. • If heavy construction equipment is necessary, structures that are located within 15 feet of heavy construction activities and that have the potential to be affected by ground-borne vibration should be identified. This task shall be conducted by a qualified structural engineer as approved by the City's Director of Community Development, or designee. • Once the construction equipment list finalized, a comparison of the proposed equipment to be used and the assumed equipment vibration levels presented in Table 7-4 of the Federal Transit Administration's (FTA) *Noise and Vibration Impact Assessment Manual* (FTA Report No. 0123) shall be completed. If it is determined that the proposed equipment would generate lower vibration levels than assumed, further vibration assessment would not be necessary. However, if levels would potentially exceed the City's standard of 0.2 inch per second peak particle velocity (PPV), the project Applicant/Developer shall develop a vibration monitoring and construction contingency plan for approval by the City Director of Community Development, or designee, to identify structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies would be identified for when vibration levels approached the limits. • If a vibration monitoring and construction contingency plan is deemed necessary, monitoring of vibration during initial construction activities would be required. Monitoring results may indicate the need for more or less intensive measurements. • When vibration levels approach limits, suspend construction and implement contingencies as identified in the approved vibration monitoring and construction contingency plan to either lower vibration levels or secure the affected structures.

No.	Mitigation Measure
	Tribal Cultural Resources
MM TCR-1	**Archaeological Monitoring**. Prior to the issuance of a grading permit, the Developer shall retain a professional archaeologist to conduct monitoring of all ground-disturbing activities at the project site. The Project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during Project construction. The Project Archaeologist, in consultation with the Pechanga Tribe, including the contractor, and the City, shall develop a CRMP as defined in TCR-3, below. The Project archeologist shall attend the pre-grading meeting with the City, the construction manager, and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The archaeological monitor shall have the authority to temporarily halt and redirect earth-moving activities in the affected area in the event that suspected archaeological resources are unearthed.
MM TCR-2	**Native American Monitoring.** Prior to the issuance of a grading permit, the Developer shall secure agreements with the Pechanga Tribe for tribal monitoring. The Developer is also required to provide a minimum of 30 days' advance notice to the tribes of all ground-disturbing activities. The Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth-moving activities in the affected area in the event that suspected archaeological and cultural resources are unearthed. The Native American Monitor(s) shall attend the pre-grading meeting with the Project Archaeologist, the City, the construction manager, and any contractors and will conduct the Tribal Perspective of the mandatory Cultural Resources Worker Sensitivity Training to those in attendance.
MM TCR-3	**Cultural Resource Monitoring Plan (CRMP).** The Project Archaeologist, in consultation with the Pechanga Tribe, the contractor, and the City, shall develop a CRMP in consultation pursuant to the definition in AB52 to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting Tribe is defined as a Tribe that initiated the AB52 tribal consultation process for the Project, has not opted out of the AB52 consultation process, and has completed AB52 consultation with the City as provided for in Cal Pub Res Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include: • Project description and location; • Project grading and development scheduling; • Roles and responsibilities of individuals on the Project; • The pre-grading meeting and Cultural Resources Worker Sensitivity Training details; • The protocols and stipulations that the contractor, City, Pechanga Tribe 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; • The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items; • Contact information of relevant individuals for the Project.

No.	Mitigation Measure
MM TCR-4	**Cultural Resource Disposition**. In the event that Native American cultural resources are discovered during the course of ground disturbing activities (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries: • 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: o 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. o On-site reburial of the discovered items as detailed in the treatment plan required pursuant to Mitigation Measure TCR-1. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed. No recordation of sacred items is permitted without the written consent of all Consulting Native American Tribal Governments as defined in 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 TCR-5	**Potential Discovery of Archaeological and Cultural Resources.** The City shall verify that the following note is included on the Grading Plan: *"If any suspected archaeological and cultural resources are discovered during ground-disturbing activities and the Project Archaeologist or Native American Tribal Representatives are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Tribal Representatives to the site to assess the significance of the find."*

No.	Mitigation Measure
MM TCR-6	**Inadvertent Finds**. If potential historic or cultural resources are uncovered during excavation or construction activities at the project site that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, 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 archeologists 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 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(s), and shall be submitted to the City for their review and approval prior to implementation of the said plan. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources.
MM TCR-7	**Human Remains**. If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the “most likely descendant”. The “most likely descendant” shall then make recommendations and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective 23.3, CEQA). **No photographs are to be taken except by the coroner, with written approval by the Pechanga Tribe.**
MM TCR-8	**Non-Disclosure of Reburial Locations**. It is understood by all parties that, unless otherwise required by law, the site of any reburial of Native American 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).

No.	Mitigation Measure
MM TCR-9	**Archaeology Report - Phase III and IV.** Prior to final inspection, the developer/permit holder shall prompt the Project Archaeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the South Coastal Information Center (SCIC) at the San Diego State University (SDSU), and one (1) copy shall be submitted to the Pechanga Tribe’s Cultural Resources Department.

INITIAL STUDY (IS) FOR PUBLIC STORAGE MORENO VALLEY

BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. **Project Case Number(s):** PEN24-0154, PEN24-0155

2. **Project Title:** Public Storage Moreno Valley Project

3. **Public Comment Period:** April 21, 2026 to May 21, 2026

4. **Lead Agency:** City of Moreno Valley
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5. **Documents Posted At:** https://moval.gov/cdd/documents/about-projects.html

6. **Prepared By:** Jazmine Estores, Environmental Planner
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7. **Project Sponsor:**

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   Chino Hills, California 91709
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8. **Project Location:** The project is located in Township 3S, Range 3W, Section 7 of the *Sunnymead, California* United States Geological Survey (USGS) 7.5-minute quadrangle map of the San Bernardino Baseline and Meridian. The project site (Assessor's Parcel Number [APN] 482-190-022) is located along Indian Street, north of Alessandro Boulevard in Moreno Valley, Riverside County. The project site is bounded by self-storage uses to the north, residential uses to the east, commercial uses (gasoline station and auto parts store) to the south, and Indian Street and commercial/retail uses to the west. Figure 1 depicts the regional and project locations. State Route 60 (SR-60) is located approximately 1.5 miles north of the

project site, and Interstate 215 (I-215) is located approximately 3 miles west of the project site.

9. **General Plan Designation:** Commercial: The primary purpose of areas designated Commercial is to provide property for business purposes, including, but not limited to retail stores, restaurants, banks, hotels, professional offices, personal services, and repair services. The zoning regulations identify the specific uses permitted on each parcel of land in the City, which could include compatible noncommercial uses. Commercial development intensity should not exceed a Floor Area Ratio (FAR) of 1.00 and the average floor area ratio should be significantly less. Further, it should be noted that the City is in the process of finalizing the adoption of its 2040 General Plan Update (GP Update). Land use designations for the project site and surrounding properties are expected to remain the same from the 2006 GP to the 2040 GP Update.

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

11. **Existing Zoning:** Existing: Neighborhood Commercial (NC): The primary purpose of the Neighborhood Commercial (NC) district is to satisfy the daily shopping needs of Moreno Valley residents by providing construction of conveniently located neighborhood centers that provide limited retail commercial services. These centers must be compatible with the surrounding residential communities.[1]

    Proposed: Community Commercial (CC): The primary purpose of the community commercial (CC) district is to provide for the general shopping needs of area residents and workers with a variety of business, retail, personal and related or similar services. (Ord. 359, 1992; Ord. 590 § 2, 2001).[2]

    The project would provide self-storage services to residents and workers in the City and would be consistent with the current Commercial General Plan land use designation of the project site. The project includes a zone change from Neighborhood Commercial (NC) District to Community Commercial (CC) District in order to facilitate the proposed development. The project site is located south of an existing self-storage facility and in proximity to existing commercial uses west of Indian Street and south of the project site. Due to the uses surrounding the project site, the proposed development would incorporate seamlessly with the existing development pattern of the neighborhood and would serve the residential uses and businesses in the vicinity of the site and provide them with the convenience of storage amenities close to home. As described above, the City is in the process of finalizing and adopting its 2040 GP Update. Under the proposed 2040 GP Update, the project site's zoning would change from NC to Corridor Mixed Use (CMU). The CMU zone would allow self-storage uses as a permitted use by right.

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1 City of Moreno Valley. 2024. City of Moreno Valley Municipal Code, Section 9.04.020, Commercial development districts.
2 Ibid.

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

	Land Use	General Plan	Zoning
Project Site	Vacant	Commercial	Existing: Neighborhood Commercial (NC) District*; Proposed: Community Commercial (CC) District
North	Self-storage facility	Commercial	Community Commercial (CC) District
South	Gasoline station and auto parts store	Commercial	Neighborhood Commercial (NC) District
East	Residential uses	Residential: Max. 5 dwelling units/acre	Residential 5 District (R5)
West	Indian Street and commercial/retail uses	Commercial	Community Commercial (CC) District

* Under the City's proposed 2040 General Plan, the project site's zoning would change to Corridor Mixed Use (CMU).

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

Environmental Setting

The project site is located along Indian Street, north of Alessandro Boulevard, and is substantially surrounded by commercial and residential uses. The site itself is vacant and contains ruderal vegetation. The property was previously used for agriculture from 1938 to 1997.

Project Description

The proposed project includes development of a 130,764-square-foot, three-story, self-storage building, 12 passenger vehicle parking spaces, 6 bicycle parking spaces, and 52 recreational vehicle (RV) parking spaces. The proposed project includes up to two employees per shift to operate the facility.[3] Office hours would be 9:00 a.m. to 6:00 p.m. Customer access hours would be 6:00 a.m. to 9:00 p.m.

According to the City's existing Zoning map and the City's existing General Plan, the project site is zoned Neighborhood Commercial (NC) and has a land use designation of Commercial. Per City Municipal Code Permitted Uses Table 9.02.020-1 in Section 9.02.020,[4] self-storage facilities are not permitted uses in the Neighborhood Commercial (NC) zone, so the project includes a zone change to change the zoning designation of the project site from Neighborhood Commercial (NC) to Community Commercial (CC) and a Conditional Use Permit (CUP) to allow development of the proposed project within the Community Commercial (CC) zone. As noted above, under the City's proposed 2040 GP Update, the project site's zoning would change from NC to CMU. The CMU zone would allow mini-storage uses as a permitted use with the approval of a Conditional Use Permit (CUP).

The proposed project includes development of an approximately 130,764-square-foot self-storage building, inclusive of self-storage area and a rental office. The proposed building would consist of three stories above ground level, reaching a maximum height of approximately 42 feet. The on-site rental office would be located

[3] Assumes up to two shifts per day.
[4] City of Moreno Valley. 2024. Municipal Code, Permitted Uses, Table 9.02.020-1.

in the southeastern corner of the building. An approximately 16-foot setback would be provided between the proposed self-storage building and the western property boundary along Indian Street, and a 10-foot setback would be provided between the RV parking lot and the eastern property boundary. Setbacks to the north and south would be approximately 6 feet and 45 feet, respectively. Tubular steel fencing, with attached privacy screening, would be erected 7 feet high along the southern boundaries of the project site in the secured area separating the project site from adjacent commercial uses, and a decorative concrete masonry unit (CMU) wall would be constructed 6 feet high along the southern and eastern property boundaries to separate the project site from adjacent residential uses. Along the northern property line, the existing adjacent buildings located at the property line would secure the site. All on-site drive aisles and passenger vehicle and RV parking would be constructed on the eastern half of the project site.

Vehicular access to the project site would be provided via Indian Street and the existing shared access driveway south of the proposed self-storage building. The access driveway would lead to two access gates, one on the east side of the proposed self-storage building facilitating access to the northern portion of the project site, and the other gate also on the east side of the proposed self-storage building facilitating access to the eastern portion of the project site. The proposed RV parking lot would include 52 RV spaces. Additionally, 12 passenger vehicle parking spaces, including one Americans with Disabilities Act (ADA) compliant space, and 6 bicycle parking spaces would be provided adjacent to the east of the proposed self-storage building. In accordance with Section 9.11.040 of the City's Municipal Code,[5] the proposed parking space supply would be adequate to accommodate the proposed project's parking demand.

The project would include installation of landscaping and trees along the project site frontage of Indian Street, as well as landscaping along the project site setbacks to the north, east, and south. Additionally, the project would interconnect to existing sewer, water, electric, and telecommunications utilities within the Indian Street right-of-way. The building would be all electric and would not include natural gas connections.

Construction would include excavation to depths of at least 5 feet below the proposed grade or 3 feet below the bottom of the proposed foundations and floor slabs, whichever is deeper; grading, paving, and construction of the proposed self-storage building and parking areas; and the installation of lighting, fencing, and landscaping. The project also includes trenching from the proposed self-storage building into the right-of-way of Indian Street to facilitate utility interconnections. During grading, on-site soils would be excavated and recompacted in accordance with the California Building Code (CBC) to accommodate the proposed self-storage building and parking areas. Construction equipment anticipated to be used includes rubber-tired dozers, tractors/loaders/backhoes, excavators, graders, scrapers, cranes, forklifts, generators, welders, air compressors, and paving equipment.

Construction parking and staging would occur on the project site. However, it is possible there would be temporary lane closures necessary along Indian Street during project construction. Construction hours would conform to City standards.

[5] City of Moreno Valley. 2024. City of Moreno Valley Municipal Code Section 9.11.040, Off-street parking requirements.

Grading activities would be limited to between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between the hours of 8:00 a.m. and 4:00 p.m. on Saturday in accordance with City Municipal Code Section 8.21.050(O). The operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work, would be limited to between the hours of 7:00 a.m. and 8:00 p.m. every day in accordance with City Municipal Code Section 11.80.030(D)(7). Approximately 4,210 cubic yards of soil export (cut) would be required for excavation, compaction, and rough grading.

Construction of the project will take approximately 12 months and is expected to be completed in Q3 2028.

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

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

On March 27, 2025, the City sent Assembly Bill (AB) 52 outreach letters to tribes traditionally and culturally affiliated with the City. The letters, sent via certified mail to the tribal contacts, described the project, provided maps of the proposed project site, and invited the tribes to request consultation should they have any concerns. Representatives with the Agua Caliente, Pechanga, and Rincon tribes responded with the request to incorporate selected mitigation measures associated with Tribal Cultural Resources as part of this Draft IS/MND.

Per AB 52 requirements, the City is continuing to follow up with the Pechanga Tribe in order to ensure any concerns or comments are captured within the tribal consultation process for the proposed project and also ensuring that the Tribal Cultural Resources mitigation measures included as part of this document reflect the best practices for handling any potential Tribal Cultural Resources that may be encountered during construction activities for the proposed project. Please refer to Section V, Cultural Resources, and Section XVIII, Tribal Cultural Resources, of this Draft IS/MND for more information regarding tribal consultation efforts conducted in association with the proposed project.15. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

a. City of Moreno Valley: Approval of Change of Zone.

b. City of Moreno Valley: Approval of Conditional Use Permit (CUP).

c. City of Moreno Valley: Approval of Grading and Building Permits.

d. Santa Ana Regional Water Quality Control Board: National Pollutant Discharge Elimination System (NPDES) authorization.

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

    a. **Appendix A:** Air Quality, Energy, and Greenhouse Gas Technical Memorandum

    b. **Appendix B:** Health Risk Assessment (HRA)

    c. **Appendix C:** Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report

    d. **Appendix D:** Cultural Resources Assessment

    e. **Appendix E:** Geotechnical Engineering Exploration and Analysis

    f. **Appendix F:** Phase I Environmental Site Assessment

    g. **Appendix G:** Water Quality Management Plan

    h. **Appendix H:** Hydrology Report

    i. **Appendix I:** Noise and Vibration Impact Analysis

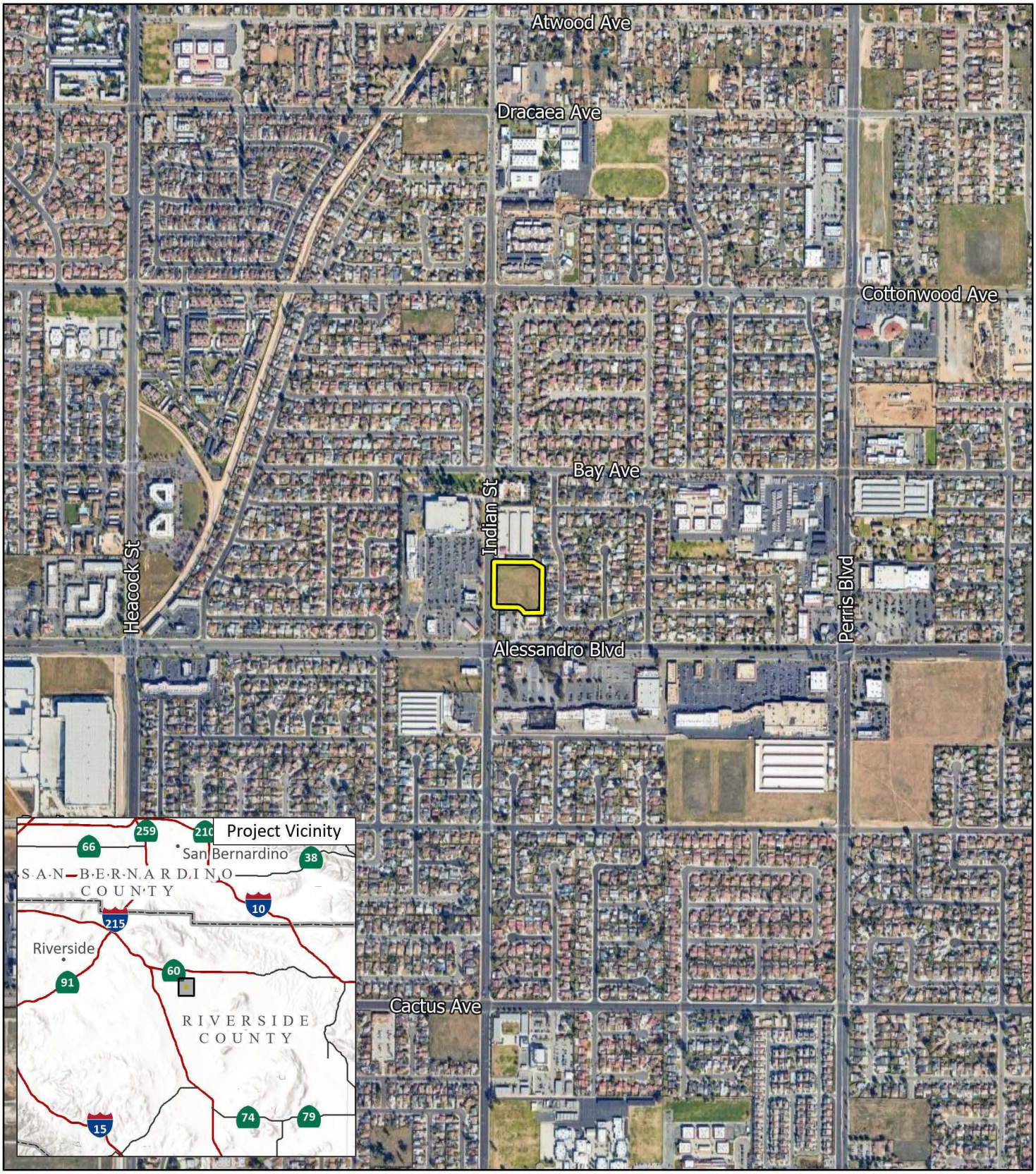
    j. **Appendix J:** Trip Generation and Vehicle Miles Traveled Analysis

17. **Acronyms:**

AB	Assembly Bill
ADA	American with Disabilities Act
ADT	average daily traffic
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
Basin Plan	Water Quality Control Plan for the Santa Ana River Basin
BMPs	best management practices
CAAQS	California Ambient Air Quality Standards
Cal OES	Governor's Office of Emergency Services
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen Code	California Green Building Standards Code
CalEEMod	California Emissions Estimator Model
CAP	Climate Action Plan
CBC	California Building Code
CC	Community Commercial
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CH_4	methane
City	City of Moreno Valley
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide

CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CO_2e/yr	carbon dioxide equivalents per year
CUP	Conditional Use Permit
CWA	Clean Water Act
dBA	A-weighted decibel
DEH	(Riverside County) Department of Environmental Health, Hazardous Materials Division
DTSC	Department of Toxic Substance Control
DWR	Department of Water Resources
EIR	Environmental Impact Report
EMWD	Eastern Municipal Water District
EO	Executive Order
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gas
GWh	gigawatt-hours
Gya	Greenfield sandy loam
HcA	Hanford coarse sandy loam
HRA	Health Risk Assessment
HVAC	Heating, Ventilation, and Air Conditioning
I-215	Interstate 215
in/sec	inches per second
IS	Initial Study
ITE	Institute of Transportation Engineers
kWh	kilowatt-hours
L_{eq}	equivalent continuous sound level
LID	Low Impact Development
LOS	Level of Service
LRA	Local Responsibility Area
LST	Localized Significance Threshold
LUST	Leaking Underground Storage Tank
Lw	sound power levels
MARB	March Air Reserve Base
MARB/IPA	March Air Reserve Base/Inland Port Airport
MBTA	Migratory Bird Treaty Act of 1918
MEI	maximally exposed individual
MLD	Most Likely Descendant
mph	miles per hour
MSHCP	Multiple Species Habitat Conservation Plan
MT	metric tons
MVPD	Moreno Valley Police Department
MVU	Moreno Valley Electric Utility
MVUSD	Moreno Valley Unified School District
MWD	Metropolitan Water District
MVRWRF	Moreno Valley Regional Water Reclamation Facility
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NC	Neighborhood Commercial
NCCP	Natural Communities Conservation Plan
NETR	Nationwide Environmental Title Research
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System

O_3	ozone
OPR	Governor's Office of Planning & Research
PM_{10}	particulate matter less than 10 microns in size
$PM_{2.5}$	particulate matter less than 2.5 microns in size
ppm	parts per million
PPV	peak particle velocity
project	Public Storage Moreno Valley Project
PWQMP	Preliminary Water Quality Management Plan
R5	Residential 5 District
RCFCWCD	Riverside County Flood Control & Water Conservation District
RCFD	Riverside County Fire Department
REC	recognized environmental condition
ROG	reactive organic gas
RTA	Riverside Transit Agency
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCIC	South Coastal Information Center
SDS	Safety Data Sheets
SKR HCP	Stephens' Kangaroo Rat Habitat Conservation Plan
SMARA	Surface Mining and Reclamation Act
SOx	sulfur oxides
SR-60	State Route 60
SRA	Source Receptor Area, also State Responsibility Area
SSC	California Species of Special Concern
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	toxic air contaminants
TCP	Traditional Cultural Property
TNW	traditional navigable waters
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
V/C	Volume/Capacity
VdB	vibration velocity in decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOCs	volatile organic compounds
WEAP	Worker's Environmental Awareness Program
WQMP	Water Quality Management Plan



LSA

Project Location

FIGURE 1

N

0 500 1000
FEET

SOURCE: Google Maps (2024)

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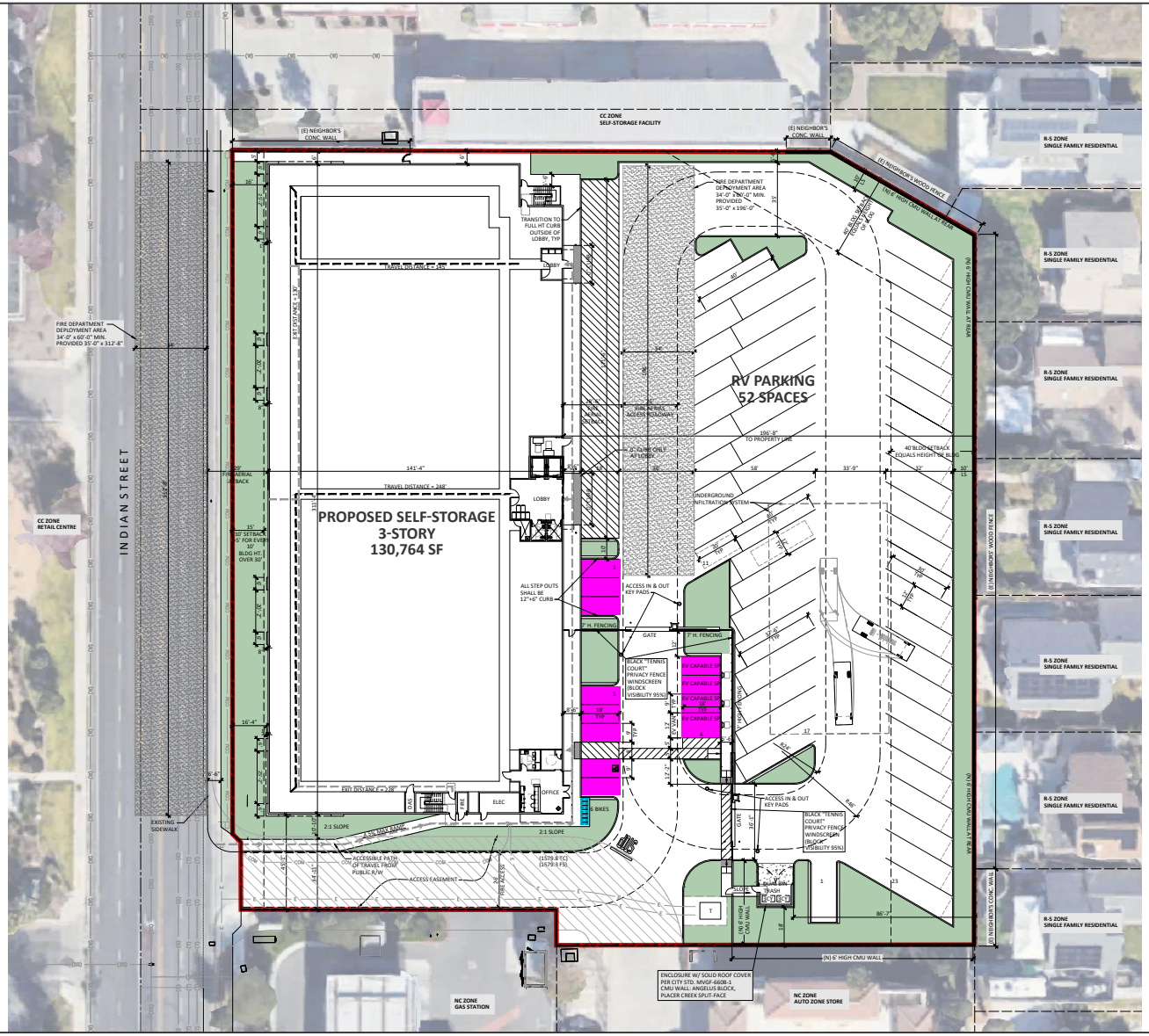
Public Storage Moreno Valley Project

Regional and Project Location



LSA

LEGEND

- Site Boundary
- Vehicle Parking Spaces (12 Total)
- Bicycle Parking Spaces (6 Total)

FIGURE 2

0 40 80

FEET

SOURCE: KSP Studios

I:\2024\20241908\G\Site_Plan.ai (9/16/2025)

Public Storage Moreno Valley

Site 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.

Gabriel Diaz
Signature

April 9, 2026
Date

Gabriel Diaz
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 significant.

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:

Less Than Significant Impact. A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. The City of Moreno Valley does not identify any scenic vistas in its General Plan; however, it considers the Box Springs Mountains and Reche Canyon area to the north, the "Badlands" to the east, and the Mount Russell area to the south to be major scenic resources and generally identifies view corridors in the City that provide views of those resources.[6] The City's General Plan also notes that views of the San Bernardino and San Gabriel Mountains from the valley floor within the City are evident on clear days.

Of the scenic resources described above, only the views of the Box Springs Mountains to the north are consistently available from Indian Street. Views of the San Bernardino Mountains to the northeast are also visible from Indian Street adjacent to the project site; however, views of those mountains are typically obscured from Indian Street by urban development on the east side of the street.

The project site is located along Indian Street, north of Alessandro Boulevard. The project site is bounded by self-storage uses to the north, residential uses to the east, commercial uses (gasoline station and auto parts store) to the south, and Indian Street and commercial/retail uses to the west. Bay Side Park, which is located 0.17-mile northwest of the project site, provides partial views of the Mount Russell area to the southeast. The proposed project would be partially visible from Bay Side Park; however, the height of the proposed project would be consistent with the City's height standards and the proposed project would not obstruct views of the Mount Russell area. Following completion of the proposed project, views of the Badlands to the east and the San Bernardino Mountains to the northeast of the project site for motorists traveling northbound along Indian Street would be obscured by the proposed project. However, due to development in the surrounding area and along Indian Street, viewers on the roadway only experience these views periodically while passing by development. While the proposed project would potentially block some views of the San Bernardino Mountains and the Badlands, these views are already partially obstructed because of the distance from these resources and intervening land uses. Given the built-out nature of the surrounding area, the project would not result in a substantial adverse impact on a scenic vista. Overall, the development of the proposed project would have a **less than significant impact** on scenic vistas due to its limited size and height, and no mitigation is required.

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

Response:

Less Than Significant Impact. According to the California Department of Transportation (Caltrans) Scenic Highway Mapping Program, there are no eligible or designated Scenic Highways in the vicinity of the project site.[7] The closest designated or eligible Scenic Highway is State Route 74 (SR-74), located approximately 9.4 miles south of the project site. Due to its distance from the project site and the presence of intervening topography, the project site is not visible from the eligible segment of SR-74 mentioned above. The project site contains a few scattered trees, none of which are considered to be scenic resources. The project site is highly disturbed, and no rock outcroppings or historic buildings are present on the site. Development of the project would not result in damage to any scenic resources. Therefore, the development of the project will have a **less than significant impact** related to scenic resources within a State scenic highway, and no mitigation is required.

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[6] City of Moreno Valley. 2006. City of Moreno Valley General Plan. Chapter 7 – Conservation. July.

[7] California Department of Transportation (Caltrans). 2018. California State Scenic Highway System Map. Website: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed December 13, 2024).

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

Response:

Less Than Significant Impact. The construction phase of the project would introduce the use of construction equipment such as excavators, graders, and bulldozers, etc. The presence of the construction equipment, as well as the construction activities would temporarily alter the scenic quality of the project site. Construction staging areas, including earth stockpiling, storage of equipment and supplies, and related activities would contribute to a change in scenery at the project site, which would be a short-term visual impact. Because construction activities would be temporary, scenic quality impacts during construction would be **less than significant**. No mitigation is required.

The proposed project features a variety of architectural elements. It is anticipated that the buildings would utilize a combination of colors and/or materials to establish a mix of textural elements while maintaining visual interest. The proposed landscaping would replace the vacant weedy field with a consistent and integrated vegetation palette. Landscaping on site would be provided in accordance with the City's Municipal Code Chapter 9.17.30 (Landscape and Irrigation Standards), which requires the installation of landscaping on-site. The project would comply with these requirements by using landscaping throughout the site and visible to the public from the street. Although the visual characteristics of the project site would change, the proposed project would replace the existing vacant lot with an attractive, well-designed development using varied architectural elements and massing, landscaping, and color combinations. In addition, the project would be designed and constructed per applicable City Municipal Code and General Plan standards. Therefore, the project would not result in a negative aesthetic effect to the existing visual character or quality of the project site or surroundings. Impacts would be **less than significant**, and mitigation is not required.

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

Response:

Less Than Significant Impact. The project site presently does not contain any sources of light. Sources of light in the area include street lighting and signal lighting along Indian Street, as well as from the adjacent residential and commercial uses surrounding the project site. Glare can be both a daytime occurrence resulting from light reflecting off reflective surfaces affecting viewers and a nighttime occurrence from light from headlights on nearby moving vehicles and traffic lights.

At night, the project's interior and exterior building lights and landscape lighting would be visible from the adjacent residential uses, and to a lesser extent, from the surrounding public streets. However, these light sources would not have a significant impact on the night sky, as they would not exceed existing background light levels already present within the surrounding area. In addition, the proposed project would be required to comply with the City of Moreno Valley's General Plan and Municipal Code requirements for lighting (Chapter 9.08.100 Lighting). Adherence to the City's Municipal Code requirements would ensure that project-related lighting impacts would be less than significant. No mitigation is required.

Sources of glare as a result of project implementation include reflective building materials and vehicles parked within and traveling to and from the project site. The amount of glare would depend on the location of the reflective surfaces and the direction of the sun. Any glare produced by the reflective surfaces would be temporary, as the location of the sun would be changing throughout the day. Additionally, the City's Design Review process includes consideration of material composition and colors to reduce the potential for substantial glare from the proposed on-site structures. Therefore, impacts from glare would be **less than significant**. No mitigation is required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Community Development Element – Section 2.3 – Community Design
   - Chapter 7 – Conservation Element – Section 7.8 – Scenic Resources
     - Figure 7-2 – Major Scenic Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.11 – Aesthetics
     - Figure 5.11-1 – Major Scenic Resources
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.110 – Light and Glare
   - Chapter 9.16 – Design Guidelines
   - Section 9.17.030 G – Heritage Trees

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:**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:
No Impact. The California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP) compiles important farmland maps pursuant to the provisions of Section 65570 of the California Government Code. According to the FMMP, the project site lies within "Urban and Built-Up Land."[8] There are two sites southeast of the project site along Alessandro Boulevard that are designated as Farmland of Local Importance; however, the project site and the majority of the surrounding area do not contain any designated Farmland. Therefore, no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be impacted, and **no impact** would occur. No mitigation is required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

Response:
No Impact. The California Land Conservation Act of 1965, commonly known as the Williamson Act, enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space uses. In return, landowners are given a lower property tax assessment. The project site does not contain land that is enrolled in a Williamson Act contract.[9] According to the City's General Plan,[10] there are no parcels within the City that are under a Williamson Act contract. In addition, the project site is zoned Neighborhood Commercial (NC) and would be rezoned to Community Commercial (CC). Therefore, the proposed project is not zoned for agricultural

[8] California Department of Conservation. 2020. Farmland Mapping and Monitoring Program, California Important Farmland Finder. Website: https://www.conservation.ca.gov/dlrp/fmmp/Pages/Riverside.aspx (accessed December 16, 2024).
[9] California Department of Conservation. 2023. California Williamson Act Enrollment Finder. Website: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/ (accessed December 23, 2024).
[10] City of Moreno Valley. 2006. City of Moreno Valley General Plan. Chapter 7 – Conservation, Page 7-12. July.

uses and is not part of a Williamson Act contract. **No impact** associated with a Williamson Act contract or agricultural zoning would occur. No mitigation is required.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

Response:
No Impact. The project site is currently vacant and undeveloped. The site does not contain any forest land or timberland, nor is it zoned for such uses. Therefore, the proposed project will have **no impact** on forest land, timberland, or timberland zoned Timberland Production. No mitigation is required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

Response:
No Impact. Please refer to Checklist Response II(c). The project site is located within an urbanized area and does not contain forest land. There is no forest land on the project site and the proposed zoning would not permit such uses. **No impact** would occur, and no mitigation is required.

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

Response:
No Impact. As noted above, the project site is currently vacant and not utilized for agricultural production or timberland production. The project site is not directly adjacent to areas used for or zoned for agriculture or forest uses. Therefore, the proposed project would not result in the conversion of farmland to non-agricultural use or forest land to non-forest uses. **No impact** would occur, and no mitigation is required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.7 – Agricultural Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.8 – Agricultural Resources
     - Figure 5.8-1 – Important Farmlands
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code

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:**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

Response:
Less Than Significant Impact. A consistency determination plays an essential role in local agency project review by linking local planning and unique individual projects to the air quality plans. A consistency determination fulfills the California Environmental Quality Act (CEQA) goal of fully informing local agency decision-makers of the environmental costs of the project under consideration at a stage early enough to ensure that air quality concerns are addressed. Only new or amended General Plan elements, Specific Plans, and significantly unique projects need to undergo a consistency review due to the air quality plan strategy being based on projections from local General Plans.

The proposed project would construct a 130,764-square-foot, three-story, self-storage building and associated site improvements including 19,437 square feet of landscaping. The proposed project is not

considered a project of statewide, regional, or areawide significance (e.g., large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential development of more than 500 dwelling units, or shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space) as defined in the California Code of Regulations [(CCR) Title 14, Division 6, Chapter 3, Article 13, §15206(b)]. Because the proposed project would not be defined as a regionally significant project under CEQA, it does not meet the Southern California Association of Governments (SCAG) Intergovernmental Review criteria.

The City's General Plan is consistent with the SCAG's Regional Comprehensive Plan Guidelines and the South Coast Air Quality Monitoring District's (SCAQMD) Air Quality Management Plan (AQMP). Pursuant to the methodology provided in the SCAQMD *CEQA Air Quality Handbook*, consistency with the South Coast Air Basin (Basin) 2022 AQMP is affirmed when a project (1) would not increase the frequency or severity of an air quality standards violation or cause a new violation, and (2) is consistent with the growth assumptions in the AQMP. Consistency review is presented as follows:

1. The project would result in short-term construction and long-term operational pollutant emissions that are less than the (CEQA) significance emissions thresholds established by SCAQMD, as demonstrated below; therefore, the project would not result in an increase in the frequency or severity of an air quality standards violation or cause a new air quality standards violation.

2. The *CEQA Air Quality Handbook* indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Projects of statewide, regional, or areawide significance include large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential developments of more than 500 dwelling units, and shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space), as defined in CCR Title 14, Division 6, Chapter 3, Article 13, Section 15206(b). As discussed in the Project Location and Description section, the project site is currently zoned as NC and has a land use designation of Commercial. Per the City Municipal Code Permitted Uses Table 9.02.020-1 in Section 9.02.020,[11] self-storage facilities are not permitted uses in the NC zone. Therefore, the proposed project would require a zone change to change the zoning designation of the project site from NC to CC and a Conditional Use Permit (CUP) to allow development of the proposed project within the CC zone.

   The projections in the AQMP for achieving air quality goals are based, in part, on assumptions in SCAG's *Regional Transportation Plan and Sustainable Communities Strategy* (RTP/SCS) regarding population, housing, and growth trends, as well as assumptions and projections of local planning agencies to determine control strategies for regional compliance status. According to SCAG's 2024–2050 RTP/SCS, the City's households and employment are forecast to increase by approximately 21,900 households and 38,700 jobs, respectively, between 2019 and 2050.[12] The City's General Plan has a year 2040 buildout horizon; however, the General Plan does not specify or anticipate when complete buildout would occur because long-range demographic and economic trends are speculative. Further, it should be noted that the City is currently in the process of finalizing the adoption of its 2040 GP Update. Regardless of when the City's 2040 General Plan is approved, this information from SCAG's 2024-2050 RTP/SCS would remain the same. The designation within the General Plan of a site for a certain use does not necessarily mean that the site would be developed with that use during the planning period because most development depends on property owner initiative.

   Based on information provided by the Applicant/Developer, the proposed project would include up to two employees per shift to operate the facility.[13] Therefore, the proposed project has the potential to employ up to four employees, some of which may already reside in Moreno Valley. According to SCAG, up to four employees would represent approximately 0.0001 percent of the City's forecasted employment growth of 38,700 employees from 2019 to 2050. Therefore, the employment growth associated with the proposed project would be within the parameters of the expected overall growth in the City, and a zone change designation of the site from NC to CC for

[11] City of Moreno Valley. 2024. Permitted Uses Table 9.02.020-1. Website: https://ecode360.com/attachment/MO4973/MO4973-009a%20Permitted%20Uses%20Table%209.02.020-1.pdf (accessed January 2025).

[12] Southern California Association of Governments (SCAG). 2024. *2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. Demographics and Growth Forecast, Technical Report*, Table 13. Adopted April 4, 2024.

[13] Assumes up to two shifts per day.

development of the proposed 130,764-square-foot, three-story, self-storage building would not result in growth in the area or in Moreno Valley beyond that which was planned for by SCAG. This is because the proposed project is intended to meet the storage needs of those who already live and/or work in the surrounding area.

Furthermore, the 2024–2050 RTP/SCS analyzed the region's transportation system, future growth projections, and potential funding sources in order to develop a long-term framework for transportation improvements and maintenance.[14] The RTP includes policies and regulations set forth to ensure that development of transportation infrastructure within the SCAG regional area is within planned and forecasted socioeconomic projections in order to achieve federal- and State-mandated regional emissions standards and greenhouse gas (GHG) reduction targets. As part of the Regional Transportation Plan (RTP), SCAG developed a Sustainable Communities Strategy (SCS), which was required by Senate Bill (SB) 375, the Sustainable Communities Act of 2008. The SCS is intended to combine land use and transportation planning with the overall goal of reducing air pollutant and GHG emissions generated from vehicle travel. The City currently has approximately 5,700 unemployed persons eligible to work.[15] Therefore, development of the project site, as proposed, would provide employment opportunities within Moreno Valley and support the AQMP's and SCAG's goal of reducing air pollutant and GHG emissions generated from vehicle travel.

Based on the proposed self-storage building size (130,764 square feet), the project is expected to generate up to four employees. Therefore, the proposed project is not considered a project of Statewide, regional, or areawide significance (e.g., large-scale projects such as airports, electrical generating facilities, petroleum and gas refineries, residential developments of more than 500 dwelling units, and shopping centers or business establishments employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space) as defined in CCR Title 14, Division 6, Chapter 3, Article 13, Section 15206(b). Because the proposed project would not be defined as a regionally significant project under CEQA, it does not meet SCAG's Intergovernmental Review criteria.

Based on the analysis above, the proposed project would not represent substantial or unplanned employment or population growth forecast by SCAG or the AQMP. Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be **less than significant,** and mitigation is not required.

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

Response:

Less Than Significant Impact. The South Coast Air Basin is currently designated nonattainment for the federal and State standards for 8-hour ozone (O_3) and particulate matter less than 10 microns in size (PM_{10}). The Basin is also nonattainment for the State standard for 1-hour O_3. The Basin's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of an ambient air quality standard. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. Therefore, additional

[14] Southern California Association of Governments (SCAG). 2024. *2024-2050 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Navigating to a Brighter Future*. April. Website: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1714175547 (accessed January 2025).

[15] State of California, Employment Development Department. 2023. Monthly Labor Force and Unemployment Rate for Cities and Census Designated Places. September. Website: https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Flabormarketinfo.edd.ca.gov%2Ffile%2Flfmonth%2Fsanbrsub.xls&wdOrigin=BROWSELINK (accessed January 2025).

analysis to assess cumulative impacts is not necessary. The following analysis assesses the potential project-level air quality impacts associated with construction and operation of the proposed project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate matter emissions (i.e., fugitive dust) generated by grading, building construction, paving, and other activities. Emissions from construction equipment are also anticipated and would include carbon monoxide (CO), nitrogen oxides (NO_X), volatile organic compounds (VOCs), directly emitted particulate matter less than 2.5 microns in size ($PM_{2.5}$) or PM_{10}, and toxic air contaminants (TACs) such as diesel exhaust particulate matter. Project construction activities would include grading, site preparation, building construction, architectural coating, and paving activities. Construction-related effects on air quality from the proposed project would be greatest during the site preparation phase due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at the construction site. Unless properly controlled, vehicles leaving the site would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and amount of operating equipment. Larger dust particles would settle near the source, whereas fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. SCAQMD has established Rule 403: Fugitive Dust, which would require the Applicant/Developer to implement measures that would reduce the amount of particulate matter generated during the construction period. The Rule 403 measures that were incorporated in this analysis include:

- Water active sites at least twice daily (locations where grading is to occur shall be thoroughly watered prior to earthmoving).
- Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, sulfur oxides (SO_X), NO_X, VOCs, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

The California Emissions Estimator Model version 2022.1 (CalEEMod) computer program was used to calculate emissions from on-site construction equipment and emissions from worker and vehicle trips to the site. This analysis assumes that construction of the proposed project is anticipated to occur over a period of 12 months, beginning in the second quarter of 2027. This analysis also assumes that the proposed project would comply with SCAQMD Rule 403 measures. Site preparation, grading, and building activities would involve the use of standard earthmoving equipment such as large excavators, cranes, and other related equipment. In addition, the proposed project would result in approximately 4,210 cubic yards of soil exportation.[16] All other construction details are not yet known; therefore, default assumptions (e.g., construction equipment, construction worker and truck trips, and fleet activities) from CalEEMod were used.

Construction emissions are summarized in Table A below. CalEEMod output sheets are included in Appendix A.[17]

[16] The CalEEMod modeling evaluated the project emissions assuming construction would begin in November 2025 and end in November 2026 and require approximately 5,000 cubic yards of soil export. The project schedule and grading plans have since been modified to assume construction would end in the second quarter of 2027 and approximately 4,210 cubic yards of soil export would be required. The 12-month construction duration remained the same. These modifications to the project have been reviewed by LSA and it was determined that the modified construction schedule and soil export quantities would not result in more severe impacts than what is described within.

[17] LSA Associates, Inc. 2025a. *Air Quality, Energy, and Greenhouse Gas Technical Memorandum.* March.

Table A: Short-Term Regional Construction Emissions

Construction Phase	Maximum Daily Regional Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	Total PM_{10}	Total $PM_{2.5}$
Site Preparation	1.3	49.8	36.1	<0.1	9.7	5.1
Grading	0.7	22.0	16.4	<0.1	4.0	2.1
Building Construction	0.8	17.5	17.0	<0.1	1.6	0.8
Architectural Coating	12.4	1.1	1.8	<0.1	0.7	0.1
Paving	0.6	10.4	9.1	<0.1	0.1	0.5
Peak Daily Emissions	**13.2**	**71.8**	**52.5**	**<0.1**	**13.7**	**7.2**
SCAQMD Threshold	**75.0**	**100.0**	**550.0**	**150.0**	**150.0**	**55.0**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (January 2025).
Note: Maximum emissions occurred during the overlapping of site preparation and grading phases. VOCs maximum emissions occurred during the overlapping of building construction and architectural coating phases.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

The results shown in Table A indicate the proposed project would not exceed the significance criteria for daily VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, construction of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under applicable National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS). Impacts would be **less than significant,** and mitigation is not required.

Operational Air Quality Impacts. Long-term air pollutant emissions associated with operation of the proposed project include emissions from area, energy, and mobile sources. Area-source emissions include architectural coatings, consumer products, and landscaping. Energy-source emissions result from activities in buildings that use natural gas. The proposed project would be all electric; therefore, the proposed project would not generate energy source emissions. Mobile-source emissions are from vehicle trips associated with operation of the project.

Mobile source emissions include reactive organic gas (ROG) and NO_X emissions that contribute to the formation of O_3. Additionally, PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways.

Long-term operational emissions associated with the proposed project were calculated using CalEEMod. The proposed project would construct a 130,764-square-foot, three-story, self-storage building including 17,637 square feet of landscaping, 52 RV parking spaces, and 12 passenger vehicle spaces. Therefore, the proposed project analysis was conducted using the land use codes *Unrefrigerated Warehouse-No-Rail and Parking Lot.* Trip generation rates used in CalEEMod for the project were based on the project's trip generation analysis, which identifies that the project would generate approximately 216 average daily trips.[18] In addition, consistent with the project design plans, this CalEEMod analysis incorporates selections to reflect drought tolerant landscape, low water irrigation, and no natural gas. When project-specific data were not available, default assumptions from CalEEMod were used to estimate project emissions. Table B provides the proposed project's estimated operational emissions. CalEEMod output sheets are included in Appendix A.[19]

Table B: Long-Term Regional Operational Emissions

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	Total PM_{10}	Total $PM_{2.5}$
Mobile Sources	0.8	0.7	5.6	<0.1	1.2	0.3
Area Sources	4.1	<0.1	5.7	<0.1	<0.1	<0.1
Energy Sources	0.0	0.0	0.0	0.0	0.0	0.0
Total Project Emissions	**4.9**	**0.7**	**11.3**	**<0.1**	**1.2**	**0.3**
SCAQMD Threshold	**55.0**	**55.0**	**550.0**	**150.0**	**150.0**	**55.0**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Compiled by LSA (January 2025).
Note: Some values may not appear to add correctly due to rounding.

[18] LSA Associates, Inc. 2024. *Trip Generation and Vehicle Miles Traveled Analysis for the Public Storage Moreno Valley Project* (LSA Project No. 20241908). October 16.
[19] LSA Associates, Inc. 2025a. *Air Quality, Energy, and Greenhouse Gas Technical Memorandum*. March.

CO = carbon monoxide	PM_{10} = particulate matter less than 10 microns in diameter
lbs/day = pounds per day	SCAQMD = South Coast Air Quality Management District
NO_X = nitrogen oxides	SO_X = sulfur oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns diameter	VOCs = volatile organic compounds

The results shown in Table B indicate the proposed project would not exceed the significance criteria for daily VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$ emissions. Therefore, operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under applicable NAAQS or CAAQS. Impacts would be **less than significant,** and mitigation is not required.

Long-Term Microscale (CO Hot Spot) Analysis. Vehicular trips associated with the proposed project could contribute to congestion at intersections and along roadway segments in the vicinity of the project site. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, it disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, thereby affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients).

Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service (LOS) or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

An assessment of project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Existing CO concentrations in the immediate project vicinity are not available. Ambient CO levels monitored at the Lake Elsinore Monitoring station located at 506 West Flint Street (the closest station to the project site that monitors CO) showed a highest recorded 1-hour concentration of 1.3 parts per million (ppm) (the State standard is 20 ppm) and a highest 8-hour concentration of 0.8 ppm (the State standard is 9 ppm) from 2021 to 2023. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis. Reduced speeds and vehicular congestion at intersections result in increased CO emissions.

The proposed project is expected to generate 216 average daily trips, with 14 trips occurring in the a.m. peak hour and 22 trips occurring in the p.m. peak hour. Because the proposed project would generate less than 400 daily trips, it is screened out from a Vehicle Miles Traveled (VMT) analysis and presumed to have less than significant transportation impact.[20] Therefore, given the extremely low level of CO concentrations in the vicinity of the project site and the lack of traffic impacts at any intersections, project-related vehicles are not expected to result in CO concentrations exceeding the State or federal CO standards. No CO hot spots would occur, and the project would not result in any project-related impacts on CO concentrations. Impacts would be **less than significant,** and mitigation is not required.

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

Response:

Less Than Significant Impact with Mitigation. Sensitive receptors are defined as residential uses, schools, daycare centers, nursing homes, and medical centers. Individuals particularly vulnerable to diesel particulate matter are children, whose lung tissue is still developing, and the elderly, who may have serious health problems that can be aggravated by exposure to diesel particulate matter. The nearest sensitive receptors include the single-family residences along Pheasant Knoll Lane that are located within 50 feet to the east of the project site (measured from the project site boundary to the center of the nearest residence).

Localized Impact Analysis. The SCAQMD published its *Final Localized Significance Threshold Methodology* in July 2008, recommending that all air quality analyses include an assessment of air quality impacts to nearby sensitive receptors.[21] This guidance was used to analyze potential localized air quality impacts associated with construction of the proposed project. Localized significance thresholds (LSTs)

[20] LSA Associates, Inc. 2024. *Trip Generation and Vehicle Miles Traveled Analysis for the Public Storage Moreno Valley Project* (LSA Project No. 20241908). October 16.

[21] South Coast Air Quality Management District (SCAQMD). 2008. *Final Localized Significance Threshold Methodology.* July.

are developed based on the size or total area of the emission source, the ambient air quality in the Source Receptor Area (SRA), and the distance to the project site. Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality.

LSTs are based on the ambient concentrations of that pollutant within the project's SRA and the distance to the nearest sensitive receptor. For the proposed project, the appropriate SRA for the LST is the Moreno Valley area (SRA 24). The SCAQMD provides LST screening tables for 25-, 50-, 100-, 200-, and 500-meter source-receptor distances. The nearest sensitive receptors are the single-family residences along Pheasant Knoll Lane, which are located within 50 feet to the east of the project site (measured from the project site boundary to the center of the nearest residence). In cases where receptors may be closer than 82 feet (25 meters), any distances within the 82-foot (25-meter) buffer zone can be used. As such, the minimum distance of 25 meters was used for purposes of the LST assessment. Based on the anticipated construction equipment, it is assumed that the maximum daily disturbed acreage would be 3.5 acres for construction of the proposed project. The project site is 3.0 acres; therefore, the maximum daily disturbed acreage during operation of the proposed project would be 3.0 acres.[22]

Project construction and operation emissions were compared to the LST screening tables in SRA 24, based on a 25-meter source-receptor distance and a disturbed acreage of 3.5 acres for construction and an operational project site threshold of 3.0 acres. Table C shows the results of the LST analysis during project construction and operation.

Table C: Project Localized Construction and Operational Emissions

Source	Pollutant Emissions (lbs/day)			
	NO_X	CO	PM_{10}	$PM_{2.5}$
Construction Emissions				
On-Site Emissions	49.7	35.2	8.3	4.0
Localized Significance Threshold	**220.0**	**1,230.0**	**10.0**	**6.0**
Significant?	**No**	**No**	**No**	**No**
Operational Emissions				
On-Site Emissions	0.7	6.0	<0.1	<0.1
Localized Significance Threshold	**203.0**	**1,114.0**	**2.7**	**1.3**
Significant?	**No**	**No**	**No**	**No**

Source: Compiled by LSA (January 2025).
Note: Source Receptor Area 24, based on a 3.5-acre construction disturbance daily area and a 3-acre disturbance area for operation, at a distance of 25 meters from the project site boundary to the nearest sensitive receptor.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 10 microns in diameter

By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions detailed in Table C assume that all area, stationary, and energy source emissions would occur on site, and 5 percent of the project-related new mobile sources (which is an estimate of the amount of project-related on-site vehicle travel) would occur on site. The 5 percent assumption is conservative because the localized impacts analysis only includes on-site sources and the majority of vehicle travel would occur off site, resulting in emissions that would also be released off site. Table C indicates the localized operational emissions would not exceed the LSTs at nearby residences. Therefore, the proposed operational activity would not result in a locally significant air quality impact.

As detailed in Table C, the emission levels indicate that the project would not exceed SCAQMD LSTs during project construction or operation. The project's peak operational on-site NO_X emissions are anticipated to be less than 1 pound per day. Due to the small size of the proposed project in relation to the overall Basin, the level of emissions is not sufficiently high to use a regional modeling program to correlate health effects on a Basin-wide level. On a regional scale, the quantity of emissions from the project is incrementally minor. Because the SCAQMD has not identified any other methods to quantify health impacts from small projects, and due to the size of the project, it is speculative to assign any specific health effects to small project-related emissions. However, based on this localized analysis, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Therefore,

[22] South Coast Air Quality Management District (SCAQMD). n.d. *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds.* Website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf (accessed January 2025).

the project would not expose sensitive receptors to substantial levels of pollutant concentrations. Impacts would be **less than significant,** and mitigation is not required.

Health Risk Assessment. This section describes the potential impact on sensitive receptors from construction and operation of the proposed project based on the Health Risk Assessment (HRA)[23] prepared for the proposed project, included in Appendix B. As identified above, the nearest sensitive receptors include the single-family residences along Pheasant Knoll Lane that are located within 50 feet to the east of the project site (measured from the project site boundary to the center of the nearest residence). In addition, the nearest worker receptor to the project site is located immediately south of the project site, within 10 feet. The nearest school receptor to the project site is located approximately 1,000 feet east of the project site, along Bay Avenue.

In accordance with SCAQMD guidance, health risk is considered significant under the following conditions:

- Cancer risk at a nearby receptor location (i.e., area where persons reside, work, or attend school—not including streets or sidewalks) is greater than 10 cases per one million persons over a period of 30 years for adults and 9 years for children (residential uses) and 25 years for workers.
- The cumulative increase in total chronic Hazard Index[24] or total acute Hazard Index[25] for any target organ system would exceed 1.0 at any receptor location.

A construction HRA, which evaluates construction-period health risk to off-site receptors, was completed for the proposed project. Table D, below, identifies the results of the analysis at the maximally exposed individual (MEI), which is the residential receptor. Model snapshots of the sources are included in Appendix B.

Table D: Health Risks from Project Construction to Off-Site Receptors

Location	Carcinogenic Inhalation Health Risk in 1 Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential Receptor Risk	13.18	0.014	0.000
Worker Receptor Risk	0.79	0.048	0.000
School Receptor	0.01	<0.001	0.00
SCAQMD Significance Threshold	**10 in 1 million**	**1.0**	**1.0**
Significant?	**Yes**	**No**	**No**

Source: Compiled by LSA (January 2025).
SCAQMD = South Coast Air Quality Management District

As shown in Table D, the maximum cancer risk for the residential MEI would be 13.18 in 1 million, which would exceed the SCAQMD cancer risk threshold of 10 in 1 million. The worker MEI would be 0.79 in 1 million and the school MEI would be lower at 0.01 in 1 million, which would not exceed the SCAQMD cancer risk threshold of 10 in 1 million. The total chronic hazard index would be 0.014 for the residential MEI, 0.048 for the worker MEI, and less than 0.001 for the school MEI, all of which are below the threshold of 1.0. In addition, the total acute hazard index would be nominal (0.000), which would also not exceed the threshold of 1.0. Therefore, implementation of **Mitigation Measure AIR-1**, which would require the use of cleaner construction equipment, would be necessary to reduce substantial pollutant concentrations during project construction.

Mitigation Measure AIR-1 During construction of the proposed project, the project contractor shall ensure all off-road diesel-powered construction equipment of 50 horsepower or more that are used for project construction meet, at a minimum, the California Air Resources Board Tier 2 emissions standards equipped with Level 3 Diesel Particulate Filters or the equivalent.

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[23] LSA Associates, Inc. 2025b. *Health Risk Assessment for the Moreno Valley Public Storage*. March.

[24] Chronic Hazard Index is the ratio of the estimated long-term level of exposure to a TAC for a potential maximum exposed individual to its chronic reference exposure level. The chronic Hazard Index calculations include multipathway consideration, when applicable.

[25] Acute Hazard Index is the ratio of the estimated maximum 1-hour concentration of a TAC for a potential maximum exposed individual to its acute reference exposure level.

Table E identifies the results of the analysis with implementation of **Mitigation Measure AIR-1**.

Table E: Health Risks from Project Construction to Off-Site Receptors with Mitigation

Location	Carcinogenic Inhalation Health Risk in 1 Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Residential Receptor Risk	2.15	0.002	0.000
Worker Receptor Risk	0.13	0.008	0.000
School Receptor	0.0	<0.001	0.00
SCAQMD Significance Threshold	**10 in 1 million**	**1.0**	**1.0**
Significant?	**No**	**No**	**No**

Source: Compiled by LSA (January 2025).
SCAQMD = South Coast Air Quality Management District

As shown in Table E, with implementation of **Mitigation Measure AIR-1**, the cancer risk at the residential MEI would be 2.15 in 1 million, which would not exceed the SCAQMD cancer risk of 10 in 1 million. Therefore, with implementation of **Mitigation Measure AIR-1**, construction of the proposed project would not exceed SCAQMD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations. Impacts would be below thresholds and therefore **less than significant with mitigation incorporated**.

Once the proposed project is constructed, the proposed project would not be a source of substantial emissions. Therefore, implementation of the proposed project would not result in new sources of TACs. Therefore, with implementation of **Mitigation Measure AIR-1**, the project would not expose sensitive receptors to substantial levels of TACs.

Naturally Occurring Asbestos. Furthermore, the project is in Riverside County, which is among the counties found to have serpentine and ultramafic rock in their soils.[26] However, according to the California Geological Survey, no such rock has been identified in the vicinity of the project site. When demolition is proposed during construction, the demolition of existing buildings may expose asbestos used in building materials. However, the proposed project would not involve any demolition or renovation because no current development exists on the project site. Therefore, the potential risk for naturally occurring asbestos during project construction is small and would not be significant. Impacts would be **less than significant**, and mitigation is not required.

Overall, with implementation of **Mitigation Measure AIR-1**, the project would have a **less than significant impact with mitigation incorporated** related to exposing sensitive receptors to substantial pollutant concentrations.

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

Response:

Less Than Significant Impact. Heavy-duty equipment on the project site during construction would emit odors, primarily from equipment exhaust. However, the construction activity would cease after individual construction is completed. No other sources of objectionable odors have been identified for the proposed project.

The proposed project would comply with SCAQMD Rule 402 regarding odors and sources that could cause nuisances. SCAQMD Rule 402 regarding states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." The proposed uses are not anticipated to emit any objectionable odors. The proposed project would also include trash enclosures, which would reduce any potential for odors from project-related waste. Therefore, the proposed project would not result in other emissions (e.g., those leading to odors) adversely affecting a substantial number of people. Impacts would be **less than significant,** and mitigation is not required.

Sources:

[26] California Department of Conservation (DOC). n.d. California Geological Survey. Asbestos. Website: https://www.conservation.ca.gov/cgs/minerals/mineral-hazards (accessed January 2025).

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 5 – Circulation Element
   - Chapter 6 – Safety Element – Section 6.6 – Air Quality
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.3 – Air Quality
     - Figure 5.3-1 – South Coast Air Basin
   - Appendix C – Air Quality Analysis, P&D Consultants, July 2003
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.050 – Air Quality of the Moreno Valley Municipal Code
   - Section 9.10.150 – Odors of the Moreno Valley Municipal Code
   - Section 9.10.170 – Vibration of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Section 12.50.040 – Limitations on Engine Idling

IV. BIOLOGICAL RESOURCES – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

Response:

Less Than Significant with Mitigation Incorporated. A *Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis and Biology Report* was prepared for the project site in January 2025 (included as Appendix C).[27] A general biological resources survey was conducted on October 30, 2024. A habitat suitability assessment determined that the project site consists of ruderal/non-native annual grassland species as the property has been historically plowed or disked for weed abatement compliance. There is one tree, Goodding's willow (*Salix gooddingii*), located along the southern perimeter of the project site. The ruderal/non-native annual grassland is comprised of vinegar weed (*Trichostema lanceolatum*), flatspine bur ragweed (*Ambrosia acanthicarpa*), Bermuda grass (*Cynodon dactylon*), and slender wild oat (*Avena barbata*). Historical aerial imagery of the project site revealed that the project site has remained undeveloped since 1959.[28] No special-status species were found or observed during the field reconnaissance.

The project site lies within the MSHCP Plan Area; however, the project site is not located within the MSHCP Criteria Area, Public/Quasi-Public Lands, or conservation areas, nor is the site located within the MSHCP Narrow Endemic Plant Species Survey Area, burrowing owl (*Athene cunicularia hypugaea*) survey area,[29] or any other species survey area. As the project site has been recently plowed or disked for weed abatement, the site does not contain suitable habitat for any threatened or endangered species. Section 6.3.2 of the MSHCP prescribes survey needs for special-status species based on mapped surveys areas for: Criteria Area Plant Species, amphibians, and mammals; however, the project site does not fall within mapped survey areas for any of these special-status species. Species identified in MSHCP Table 9-3 are not considered adequately conserved under the MSHCP. Other species with limited coverage or with no take authorization under the MSHCP include chaparral sand-verbena (*Abronia villosa* var. *aurita*), salt marsh bird's-beak (*Chloropyron maritimum* spp. *maritimum*), Robinson's pepper-grass (*Lepidium virginicum* var. *robinsonii*), chaparral ragwort (*Senecio aphanactis*), San

[27] LSA Associates, Inc. 2025c. *Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis and Biology Report for the Moreno Valley Public Storage Project.* Page 10. January. (Appendix C).

[28] Nationwide Environmental Title Research, LLC (NETR). 2024. Historic Aerials by NETRonline (v.0.6.10). Website: https://historicaerials.com (accessed December 2024).

[29] Although the project site is not within a burrowing owl survey area, a burrowing owl habitat assessment was conducted in accordance with guidelines (California Department of Fish and Wildlife's 2012 *Staff Report on Burrowing Owl Mitigation and Burrowing Owl Survey Instructions for the Western Riverside Multiple Species Habitat Conservation Plan Area, Riverside County Environmental Programs Department,* March 29, 2006). The assessment concluded there is no suitable habitat for the burrowing owl.

Bernardino aster (*Symphyotrichum defoliatum*), Cooper's hawk (*Accipiter cooperii*), Crotch's bumble bee (*Bombus crotchii*), southern California legless lizard (*Anniella stebbinsi*), California glossy snake (*Arizona elegans occidentalis*), San Bernardino ringneck snake (*Diadophis punctatus modestus*), coast patch-nosed snake (*Salvadora hexalepis virgultea*), long-eared owl (*Asio otus*), California black rail (*Laterallus jamaicensis coturniculus*), western mastiff bat (*Eumops perotis californicus*), western yellow bat (*Lasiurus xanthinus*), pocketed free-tailed bat (*Nyctinomops femorosaccus*), southern grasshopper mouse (*Onychomys torridus ramona*), and American badger (*Taxidea taxus*).

No species identified in MSHCP Table 9-3 or the other species listed above have more than a low potential of being present on the project site due to the substantial disturbance of the site and a lack of suitable vegetation communities, soils, and hydrology. The project site does not include any suitable habitat for special-status species, and none were observed on the project site during the biological survey.[30] Based on the analysis above, the project is consistent with the MSHCP.

Nesting Birds. During the bird breeding season (January 1 through August 31), large trees on or adjacent to the project site may be used by hawks, ravens, or other large birds for nesting. Trees, shrubs, and other vegetation may provide nest sites for smaller birds. The trees present on the site can provide habitat for nesting birds that are protected by the Migratory Bird Treaty Act of 1918 (MBTA) (16 United States Code [USC] 703–711) and California Fish and Game Code Sections 3503, 3053.5, and 3800. These laws regulate the take, possession, or destruction of the nest or eggs of any migratory bird or bird of prey. To avoid potential effects to fully protected raptors, special-status bird species, and other nesting birds protected by the MBTA and California Fish and Game Code, and for compliance with the MSHCP, **Mitigation Measure BIO-1** is identified below to address potential impacts to nesting birds. With adherence to **Mitigation Measure BIO-1**, impacts would be reduced to **less than significant with mitigation incorporated**.

Species Associated with Riparian/Riverine Areas and Vernal Pools. The definition of Riparian/ Riverine habitats is based on potential for the habitat to support Riparian/Riverine Covered Species. The MSHCP species associated with Riparian/Riverine areas and Vernal Pools, as listed in Section 6.1.2 of the MSHCP, were assessed for the probability of occurring in and adjacent to the project site. No drainage features, ponded areas, or riparian habitat subject to jurisdiction by the California Department of Fish and Wildlife (CDFW), the United States Army Corps of Engineers (USACE), and/or the Regional Water Quality Control Board (RWQCB) were found within the project site during site surveys. A review of the *Sunnymead, Riverside East, Steele Peak,* and *Perris, California* United States Geological Survey (USGS) quadrangle and historic aerial photographs (NETR) did not reveal any previously mapped drainage features within the project site.[31] There are no vernal pools or other ponded areas suitable for sensitive fairy shrimp species on the project site. Soils in the project site are well drained from repeated plowing and have been previously mapped as Hanford coarse sandy loam, 0 to 2 percent slopes and Greenfield sandy loam, 0 to 2 percent slopes.[32] No hydrophytic vegetation occurs in the project site. The project site does not contain any suitable riparian vegetation or habitat for special-status riparian birds. No additional surveys or mitigation are required.

Stephens' Kangaroo Rat. The project site is located within the Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) area, and a fee payment will be required prior to issuance of a grading permit. The project will comply with the Habitat Conservation Plan (HCP) for the Stephens' Kangaroo Rat in Western Riverside County and fulfill its compensatory mitigation requirements under this plan through the payment of a fee that would fund conservation activities within the HCP area.[33]

Mitigation Measure BIO-1 A nesting bird pre-construction survey shall be conducted by a qualified biologist three days prior to ground-disturbing activities if working within the bird nesting season (January 1 through August 31). Should nesting birds be found, an exclusionary buffer shall be established by the qualified biologist. The buffer may be up to 500 feet in diameter depending on the species of nesting bird found. This buffer shall be

[30] LSA Associates, Inc. 2025c. *Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis and Biology Report for the Moreno Valley Public Storage Project*. Page 10. January. (Appendix C).

[31] Nationwide Environmental Title Research, LLC (NETR). 2024. Historic Aerials by NETRonline (v.0.6.10). Website: https://historicaerials.com (accessed December 2024).

[32] United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS). 2024. Web Soil Survey (Version 3.4.0). United States Department of Agriculture. Website: https://websoilsurvey.sc.egov.usda.gov/ (accessed December 2024).

[33] Riverside County Habitat Conservation Agency (RCHCA). 1995. Stephens' Kangaroo Rat Mitigation Fee. Website: https://www.rchca.us/185/Stephens-Kangaroo-Rat-Mitigation-Fee (accessed December 2024).

	clearly marked in the field by construction personnel under guidance of the qualified biologist and construction or clearing shall not be conducted within this zone until the qualified biologist determines that the young have fledged, or the nest is no longer active. If there is a lapse in construction activities longer than seven days, an additional pre-construction survey shall be conducted.			
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐

Response:
Less Than Significant Impact. Certain habitats/natural communities are considered to be of special concern based on: (1) federal, State, or local laws regulating their development; (2) limited distributions; and/or (3) whether they support the habitat requirements of special-status plants or animals. As discussed above, the project site was evaluated for biological resources pursuant to the MSHCP via an MSHCP Consistency Analysis (Appendix C), which included a literature review and one-day pedestrian survey conducted on October 30, 2024.[34] The habitat suitability assessment provided in the Consistency Analysis indicates the project site is dominated by non-native forbs and grasses with a few native species of plants interspersed. Due to the disturbed nature of the site and the developed setting of the surrounding properties, the project site does not contain sensitive biological resources such as riparian/riverine or vernal pool habitats. No special-status plants or wildlife, Narrow Endemic Plant Species, or Criteria Area Wildlife Species were identified due to the lack of suitable habitat on and surrounding the project site.[35] The nearest Critical Habitat unit is approximately 7.5 miles southeast of the project site as part of the MSHCP unit (Unit 6, Riverside Managed Area), specifically within Subunit 6A, San Jacinto River[36] of USFWS designated Critical Habitat for the federally listed as threatened spreading navarretia (*Navarretia fossalis*).[37] However, no portion of the project site is located in or adjacent to MSHCP Unit 6 or any other critical habitat. Additionally, a search of the California Natural Diversity Database (CNDDB) indicates the nearest sensitive habitat is Southern Sycamore Alder Riparian Woodland located approximately 4 miles west of the project site.[38]

Therefore, implementation of the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans (i.e., MSHCP), policies, regulations, or by the CDFW or USFWS. Impacts are **less than significant**, and mitigation is not required.

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

Response:
No Impact. The USACE regulates discharges of dredged or fill material into waters of the United States. These waters include wetlands and non-wetland bodies of water that meet specific criteria. This connection may be direct through a tributary system linking a stream channel with traditional navigable waters (TNW) used in interstate or foreign commerce or may be indirect through a nexus identified in the USACE regulations. In the past, an indirect nexus could potentially be established if isolated waters provided habitat for migratory birds, even in the absence of a surface connection to a navigable water of the United States. In order to be considered a jurisdictional wetland under Section 404, an area must

[34] LSA Associates, Inc. 2025c. *Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis and Biology Report for the Moreno Valley Public Storage Project*. Page 1 and Page 10. January. (Appendix C).
[35] *Ibid.* Page 7 and 8.
[36] Federal Register [FR], Vol. 75, Page 62192, October 7, 2010. Department of the Interior Fish and Wildlife Service. Endangered and Threatened Wildlife and Plants; Revised Critical Habitat for *Navarretia fossalis* (Spreading Navarretia).
[37] United States Fish and Wildlife Service (USFWS). 2024. Critical Habitat Portal. https://ecos.fws.gov/ecp/report/table/critical-habitat.html (accessed December 2024).
[38] California Department of Fish and Wildlife (CDFW). 2024. Natural Diversity Database. RareFind, Online Edition, Version 5.3.0. https://www.wildlife.ca.gov/Data/CNDDB/ (accessed December 2024).

possess three wetland characteristics: hydrophytic vegetation, hydric soils, and wetland hydrology. Each characteristic has a specific set of mandatory wetland criteria that must be satisfied in order for that particular wetland characteristic to be met.

The CDFW, under Section 1602 of the California Fish and Game Code, regulates alterations to lakes, rivers, and streams (defined by the presence of a channel bed and banks, and at least an intermittent flow of water) where fish or wildlife resources may be adversely affected. The RWQCB is responsible for the administration of Section 401 of the Clean Water Act. Typically, the areas subject to jurisdiction of the RWQCB coincide with those of the USACE (i.e., waters of the U.S. including any wetlands). The RWQCB can also assert authority over "waters of the State" under waste discharge requirements pursuant to the Porter-Cologne Water Quality Control Act. Please refer to Checklist Response IV(a). The project site is currently vacant and is currently surrounded by existing roadways, residential, and commercial uses. No federally protected wetlands, marshes, vernal pools, or coastal areas were identified within the project site. Therefore, **no impact** related to this issue would occur. No mitigation is required.

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

Response:
Less Than Significant Impact. Habitat fragmentation occurs when a single, contiguous habitat area is divided into two or more areas, or where an action isolates two or more new areas from each other. Isolation of habitat occurs when wildlife cannot move freely from one portion of the habitat to another or to/from one habitat type to another. Habitat fragmentation may occur when a portion of one or more habitats is converted into another habitat, as when scrub habitats are converted into annual grassland habitat because of frequent burning. Wildlife movement includes seasonal migration along corridors, as well as daily movements for foraging and reaching water sources. Migration corridors may include areas of unobstructed movement for deer, riparian corridors providing cover for migrating birds, routes between breeding waters and upland habitat for amphibians, and between roosting and feeding areas for birds.

The project site is not adjacent to any existing or proposed linkage or core areas as identified in the MSHCP. The project will not affect wildlife movement as the project site is surrounded by urban development and the project site does not serve as a wildlife movement corridor. A **less than significant impact** related to this issue would occur, and no mitigation is required.

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

Response:
Less Than Significant Impact. According to the City of Moreno Valley Municipal Code (as amended), Chapter 9.17, Landscape and Water Efficiency Requirements; Section 9.17.030, Landscape and Irrigation Standards; Part E, Trees, projects necessitating the removal of existing trees with four-inch or greater trunk diameters (calipers) shall be replaced at a 3 to 1 ratio, with minimum 24-inch box size trees of the same species, or a minimum 36-inch box for a one to one replacement, where approved. Additionally, Part G defines Heritage Trees as any tree that defines the historical and cultural character of the City, including older palm and olive trees, and/or any tree designated as such by official action; trees with a 15-inch diameter measured 24 inches above ground level; or trees that have reached a height of 15 feet or greater.

The biological assessment for the project documented a single (1) Gooding's willow located on the southern boundary of the project site. Additionally, the site contains three (3) Mexican fan palm (*Washingtonia robusta*) seedlings. Gooding's willow is a common native tree to California while Mexican fan palm is an invasive species classified by the California Invasive Plant Council (Cal-IPC) California Invasive Plant Inventory as having a moderate rating. Cal-IPC describes those species with a moderate rating as having substantial and apparent, but generally not severe, ecological impacts on physical processes, plant and animal communities, and vegetation structure. Their reproductive biology and other attributes are conducive to moderate to high rates of dispersal, though establishment is generally dependent upon ecological disturbance.[39]

[39] California Invasive Plant Council (Cal-IPC). 2024. California Invasive Plant Inventory. 2024. Website: www.cal-ipc.org (accessed

While the trunk caliper and height of trees on site were not measured during the survey, the three palms are small and would not meet the minimum requirements for replacement under the City's tree ordinance. The Gooding's willow is expected to meet the requirements for replacement due to having multiple trunks that would likely measure more than a 4-inch caliper combined.

Although the Gooding's willow may be 15 feet or taller, it would not qualify as a Heritage Tree because it does not retain the integrity necessary to embody the historical and cultural character of the City. The project site is substantially surrounded by residential uses with contemporary landscaping. The on-site trees are located on an undeveloped property and, therefore, are outliers without the required context to convey the historical and cultural character of the City because the historic-era homestead with which they may have been associated in the past has been demolished. Therefore, all trees on the project site will be managed in accordance with Part E of Section 9.17.030 of the City Municipal Code, which requires all trees proposed for removal to be replaced at a 3 to 1 ratio, with minimum 24-inch box size trees of the same species, or a minimum 36-inch box for a 1 to 1 replacement, where approved. Compliance with these standards is required of all projects in the City as a matter of regulatory policy (i.e., City Municipal Code) and therefore does not constitute mitigation. Impacts are **less than significant**, and mitigation is not required.

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:

Less Than Significant with Mitigation Incorporated. The MSHCP is a comprehensive, multi-jurisdictional Habitat Conservation Plan focusing on conservation of species and their associated habitats in Western Riverside County. MSHCP participants include the County and fourteen cities, including the City, which is a signatory to the plan. The MSHCP allows Riverside County and its cities to better control local land-use decisions and maintain a strong economic climate in the region while addressing the requirements of the State and federal Endangered Species Acts. The plan covers 1.26 million acres and protects 146 native plant and animal species.

As described in Checklist Response IV(a) above, the project site does not contain the habitat types described for conservation in the MSHCP, and no special-status species were observed on the project site during the biological survey. Based on the analysis above, the project is consistent with the MSHCP. The project site is mostly devoid of vegetation as the property has been historically plowed or disked for weed abatement. A habitat assessment for burrowing owl, a California Species of Special Concern (SSC) and candidate for listing as a threatened or endangered species under the California Endangered Species Act, was completed as part of the survey conducted on October 30, 2024 (Appendix C) and determined that the project site does not contain suitable habitat for burrowing owl. However, the site may be utilized by nesting birds that are protected by the MBTA and the California Fish and Game Code. Impacts to nesting birds would be reduced with implementation of **Mitigation Measure BIO-1**, provided above.

The project site is not within the MSHCP Criteria Area, Public/Quasi-Public Lands, or conservation area, nor is the site located within any species survey areas, including for plants.

As described above in Checklist Response IV(b), the project would not impact Riparian/Riverine areas. The project site is located within the Stephens' Kangaroo Rat Habitat Conservation Plan area, and a fee payment will be required prior to issuance of a grading permit. The project will comply with the Habitat Conservation Plan for the Stephens' Kangaroo Rat[40] in Western Riverside County and fulfill its compensatory mitigation requirements under this plan.

With implementation of **Mitigation Measure BIO-1**, the project as planned is consistent with the applicable MSHCP requirements, and impacts would be **less than significant with mitigation incorporated.**

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006

December 2024).

[40] Riverside County Habitat Conservation Agency (RCHCA). 1995. Stephens' Kangaroo Rat Mitigation Fee. Website: https://www.rchca.us/185/Stephens-Kangaroo-Rat-Mitigation-Fee (accessed December 2024).

- Chapter 7 – Conservation Element – Section 7.1 – Biological Resources

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

V. CULTURAL RESOURCES – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☒	☐

Response:

Less Than Significant Impact. A Cultural Resources Assessment[41] was prepared to identify and determine whether any historical or archaeological resources may be present within the limits of the project site (included as Appendix D). The Cultural Resources Assessment included a pedestrian field survey, review of online historic maps and aerial photographs, and a records search.

An intensive pedestrian field survey of the project site was conducted on October 18, 2024. The field survey revealed that the project site is severely disturbed from earth-moving, geotechnical testing, and vegetation abatement activities. No archaeological resources were identified. Additionally, review of historic period maps, aerial photographs, and online research indicated there have never been buildings or structures, on the project site.

A records search was conducted at the South Coastal Information Center (SCIC) on January 7, 2025. Results of the records search indicate that 20 previous cultural resources studies have been conducted within a 1-mile radius of the project site, none of which included any portion of the project site. Although no cultural resources have been documented within the project site, two historic period resources (33-028200, a canal; and 33-28824, a minimal archaeological site) and a Native American Traditional Cultural Property (TCP) (33-029890, Pechanga Sycamore Hills TCP) are within 1 mile. The closest resource to the project site is the archaeological site (33-28824) approximately 0.81 mile to the northeast. There are no prehistoric archaeological resources documented within 1 mile.

No cultural resources were previously documented within or near the project site, no cultural resources were identified during the survey, and the project site has sustained severe disturbance. There are no existing structures on the project site and the project would not require demolition of any built resources. The proposed project would not cause a substantial change in the significance of a historical resource pursuant to *State CEQA Guidelines* Section 15064.5. Impacts would be **less than significant,** and no mitigation is required.

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

Response:

Less Than Significant with Mitigation Incorporated. As described in Checklist Response V(a) above, the records search identified a minimal archaeological site and a Native American TCP within 1 mile of the

[41] LSA Associates, Inc. 2025d. *Cultural Resources Assessment, Public Storage Moreno Valley Project, City of Moreno Valley*. February.

project site. No archaeological resources were identified during the field survey. The project site has sustained severe disturbance; therefore, the potential for discovery of subsurface resources is low. However, construction would include excavation to depths of at least 5 feet below the proposed grade or 3 feet below bottom of foundations and floor slab, whichever is deeper. In the unlikely event that any previously unidentified archaeological resources are discovered during ground-disturbing activities, work in the area would be required to cease, and deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2 as specified in **Standard Condition CUL-1.** Additionally, due to the project's proximity to a TCP, the project would implement **Mitigation Measure CUL-1** and **Mitigation Measure CUL-2,** which require implementation of a Worker's Environmental Awareness Program (WEAP) training and archeological monitoring during construction.

Through implementation of **Standard Condition CUL-1** and **Mitigation Measures CUL-1** and **CUL-2**, impacts to archaeological resources would be **less than significant with mitigation incorporated**.

Standard Condition CUL-1 In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a "unique archaeological resource," as defined in Section 21083.2(g) of the California Public Resources Code (PRC). Personnel associated with construction of the proposed project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Prior to issuance of a grading permit, the Director of Development, their designee, and the Developer/Applicant shall ensure that this mitigation measure is documented on the grading plans.

Mitigation Measure CUL-1 Prior to the start of earth moving activities, the Project Applicant shall retain an archaeologist to conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of precontact or historic archaeological resources or human remains. The Project Applicant shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance. This measure shall be implemented to the satisfaction of the City of Moreno Valley, Planning Division.

Mitigation Measure CUL-2 A qualified professional archaeologist (either an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archeology or an archaeologist supervised by such an archaeologist) shall monitor all construction-related ground-disturbing activities. Archaeological monitoring shall occur during these excavation activities until the Project Archaeologist, based on their observations, is satisfied that there is little likelihood of encountering intact archaeological deposits. The Project Archaeologist may also determine that it is appropriate to reduce monitoring to spot-checking on a part-time basis.

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

Response:

Less Than Significant Impact. As discussed in Checklist Responses V(a) and V(b) above, the project site is severely disturbed from earth-moving, geotechnical testing, and vegetation abatement activities. No human remains have been previously identified or recorded on site. The project would require excavation, grading, and trenching activities and could result in the unanticipated discovery of unknown human remains, including those interred outside formal cemeteries.

In the unlikely event that human remains are encountered during construction activities, the proper authorities would be notified, and standard procedures for the respectful handling of human remains

during the earthmoving activities would be implemented. This process is required as part of the City's Standard Conditions of Approval for construction projects, and as specified by **Standard Condition CUL-2**. Implementation of **Standard Condition CUL-2** would reduce the potential for impacts on unknown buried human remains to a less than significant level. Therefore, impacts associated with the inadvertent discovery of human remains would be **less than significant**.

Standard Condition CUL-2 If potential historic, archaeological, Native American cultural resources or paleontological resources are uncovered during excavation or construction activities at the project site, work in the affected area must cease immediately and a qualified person (meeting the Secretary of the Interior's standards (36CFR61)) shall be consulted by the applicant to evaluate the find, and as appropriate recommend alternative measures to avoid, minimize or mitigate negative effects on the historic, prehistoric, or paleontological resource. Determinations and recommendations by the consultant shall be immediately submitted to the Planning Division for consideration, and implemented as deemed appropriate by the Community Development Director, in consultation with the State Historic Preservation Officer (SHPO) and any and all affected Native American Tribes before any further work commences in the affected area. If human remains are discovered during grading and other construction excavation, no further disturbance shall occur 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 5 days of the published finding to be given a reasonable opportunity to identify the "most likely descendant." The "most likely descendant" shall then make recommendations, and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective, CEQA).

Sources:

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

VI. ENERGY – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

Response:

Less Than Significant Impact. This section discusses energy use resulting from implementation of the proposed project and evaluates whether the proposed project would result in the wasteful, inefficient, or

unnecessary consumption of energy resources or conflict with any applicable plans for renewable energy and energy efficiency.

Construction. The anticipated construction schedule assumes that the proposed project would be built in approximately 12 months. Construction-specific phases were assessed for their energy consumption under each construction sub-phase: grading, site preparation, building construction, paving, and architectural coating activities.

Construction would require energy for the manufacture and transportation of construction materials, preparation of the site for grading and building activities, and construction of the building. All or most of this energy would be derived from nonrenewable resources. Petroleum fuels (e.g., diesel and gasoline) would be the primary sources of energy for these activities. However, construction activities are not anticipated to result in an inefficient use of energy as gasoline and diesel fuel would be supplied by construction contractors who would conserve the use of their supplies to minimize their costs on the project. Energy (i.e., fuel) usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. Impacts would be **less than significant,** and mitigation is not required.

Operation. Energy use associated with the proposed project would consist of electricity and vehicle fuel use associated with project operations. The proposed project would not be powered by natural gas, and no natural gas demand is anticipated during construction or operation of the proposed project. Electricity uses were estimated for the project using default energy intensities by land use type in California Emissions Estimator Model (CalEEMod).

Table F shows the estimated potential increased electricity, gasoline, and diesel demand associated with the proposed project. The electricity rates are from the CalEEMod analysis, while the gasoline and diesel rates are based on the traffic analysis in conjunction with United States Department of Transportation's (USDOT) fuel efficiency data and using the United States Environmental Protection Agency's (USEPA) fuel economy estimates for 2020, and the California diesel fuel economy estimates for 2021.

Table F: Estimated Annual Energy Use of Proposed Project

	Electricity Use (kWh/yr)	Natural Gas Use (kBTU/yr)	Gasoline (gal/yr)	Diesel (gal/yr)
Proposed Project	629,861	0	20,559	14,752

Source: Compiled by LSA (January 2025).
gal/yr = gallons per year
kBTU/yr = thousand British thermal units per year
kWh/yr = kilowatt-hours per year

As shown in Table F, the estimated increase in electricity demand associated with the operation of the proposed project would be 629,861 kilowatt-hours (kWh) per year. Total electricity consumption in Riverside County in 2022 was 17,780,573,271 kWh;[42] therefore, operation of the proposed project would negligibly increase the annual electricity consumption in Riverside County by approximately less than 0.1 percent.

The project would also result in energy usage associated with motor vehicle gasoline to fuel project-related trips. As shown above in Table F, the proposed project would result in the consumption of 20,559 gallons of gasoline and 14,752 gallons of diesel per year. Based on fuel consumption obtained from EMFAC2021, approximately 744.5 million gallons of gasoline and approximately 301.2 million gallons of diesel are anticipated to be consumed from vehicle trips in Riverside County in 2026. Therefore, vehicle trips associated with the proposed project would increase the annual fuel use in Riverside County by approximately less than 0.1 percent for gasoline fuel usage and approximately less than 0.1 percent for diesel fuel usage. The proposed project would result in fuel usage that is a small fraction of current annual fuel usage in Riverside County, and fuel consumption associated with vehicle trips generated by project operations would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. Therefore, gasoline demand generated by vehicle trips associated with the proposed project would be a minimal fraction of gasoline and diesel fuel consumption in California.

Furthermore, the proposed project would be constructed using energy efficient modern building materials and construction practices, and the proposed project also would use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (CCR Title 24, Sections 1601

[42] California Energy Commission (CEC). 2022. Electricity Consumption by County. Website: http://www.ecdms.energy.ca.gov/ (accessed January 2025).

through 1608). The expected energy consumption during construction and operation of the proposed project would be consistent with typical usage rates for public self-storage uses; however, energy consumption is largely a function of personal choice and the physical structure and layout of buildings. As such, the proposed project would not result in a potential significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be **less than significant,** and mitigation is not required.

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

Response:

Less Than Significant Impact. The California Energy Commission (CEC) recently adopted the 2023 Integrated Energy Policy Report.[43] The 2023 Integrated Energy Policy Report provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The 2023 Integrated Energy Policy Report covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency, energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecasts, and the California Energy Demand Forecast.

As indicated above, energy usage on the project site during construction would be temporary in nature and would be relatively small in comparison to the State's available energy sources. In addition, energy usage associated with operation of the proposed project would be relatively small in comparison to the region's available energy sources, and energy impacts would be negligible at the regional level. Because California's energy conservation planning actions are conducted at a regional level, and because the project's total impact on regional energy supplies would be minor, the proposed project would not conflict with or obstruct California's energy conservation plans as described in the CEC's 2023 Integrated Energy Policy Report. Therefore, the proposed project would not lead to new or substantially more severe energy impacts. Impacts would be **less than significant,** and mitigation is not required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.6 – Energy Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code

[43] California Energy Commission (CEC). 2023. *2023 Integrated Energy Policy Report*. California Energy Commission. Docket Number: 23-IEPR-01.

VII. GEOLOGY AND SOILS – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to https://www.conservation.ca.gov/cgs/documents/publications/special-publications/SP_042-a11y.pdf	☐	☐	☒	☐

Response:
Less Than Significant Impact. The project site is located within the Peninsular Range Geomorphic Province, an area characterized by active northeast trending strike slip faults, including the San Jacinto Fault and the Elsinore Fault. Based on the City's General Plan Safety Element, the project site is not located within the boundaries of an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act of 1972.[44] As described in the Geotechnical Engineering Exploration and Analysis prepared for the project, there are no known active or potentially active faults that traverse the project site and the risk of ground rupture due to a fault displacement beneath the site is low.[45] The closest known fault is the San Jacinto Fault zone approximately 5.1 miles northeast of the project site. As the project site is not within an identified fault zone, implementation of the project would not exacerbate the risks associated with fault rupture. Therefore, impacts related to earthquake faults would be **less than significant**. No mitigation is required.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

Response:
Less Than Significant Impact. Like all of southern California, the project site is located in a seismically active area and, therefore, will continue to be subject to ground shaking resulting from activity on local and regional faults. In addition, the project site lies in relatively close proximity to the San Jacinto fault, an active fault.[46] Therefore, during the life of the project, there is a high likelihood that there will be similar levels of ground shaking from this fault zone. The project is required to be designed and constructed in accordance with the current California Building Code (CBC) requirements. Adherence to the CBC is anticipated to address the issues related to potential ground shaking. Implementation of the project would not exacerbate the risks associated with seismic ground shaking. With the implementation of CBC requirements, seismic-related impacts would be **less than significant**. No mitigation is required.

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

Response:
Less Than Significant Impact. Liquefaction involves a sudden loss in strength of a saturated, cohesionless soil (e.g., predominantly sand, low plasticity silts, or sand silt mixtures) caused by cyclic loading such as an earthquake. This results in temporary transformation of the soil to a fluid mass. There are three factors that must exist concurrently in order for liquefaction to occur. These factors include:

- A source of ground shaking, such as an earthquake, capable of generating soil mass distortions;
- A relatively loose silty and/or sandy soil; and
- A relatively shallow groundwater table (within approximately 50 feet below ground surface) or completely saturated soil conditions that will allow positive pore pressure generation.

The project site is located within an area that has low to moderate liquefaction potential. However, the depth to groundwater in the vicinity of the project site is approximately 35 feet below grade. The results of a liquefaction analysis indicate that the ground settlement resulting from an earthquake would be

[44] City of Moreno Valley. 2006. City of Moreno Valley General Plan. Figure 6-3: Geologic Faults and Liquefaction. July.
[45] Giles Engineering Associates, Inc. 2024. Geotechnical Engineering Exploration and Analysis. May.
[46] Ibid.

negligible.[47] Therefore, implementation of the project would not exacerbate the risks associated with ground-related failure. Therefore, a **less than significant** impact related to this issue would occur. No mitigation is required.

iv) Landslides?	☐	☐	☒	☐

Response:
Less Than Significant Impact. The geologic and topographic characteristics of an area, often determine its potential for landslides. Steep slopes, the extent of erosion, and the rock composition of a hillside all contribute to the potential for slope failure and landslide events. Common triggering mechanisms of slope failure include undercutting of slopes by erosion or grading, saturation of marginally stable slopes by rainfall or irrigation, and seismic shaking of marginally stable slopes during earthquakes. As described in the City's Safety Element of the General Plan, there is the potential for landslides in the Badlands area within the easternmost portion of the City's Sphere of Influence because there are steep slopes, and the underlying geological material is poorly consolidated.[48] The project site is generally flat with no evidence of landslides occurring on site and the project site, and it is not located near the Badlands area. There are no natural or artificial slopes on the project site that have the potential for landslides. As the proposed project is not expected to be exposed to a landslide hazard and would not exacerbate landslide risks, a **less than significant** impact related to this issue would occur. No mitigation is required.

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

Response:
Less Than Significant Impact. Soils are classified by the United States Department of Agriculture (USDA) Natural Resource Conservation Service into four hydrologic soils groups based on the soil's runoff potential. "Hydrologic soil group" is a term that represents a group of soils having similar runoff potential under similar storm and cover conditions. Soil properties that influence runoff potential are those that influence the minimum rate of infiltration for bare soil after prolonged wetting. The two soil units mapped within the project site are: Greenfield sandy loam (GyA), 0 to 2 percent slopes, and Hanford coarse sandy loam (HcA), 0 to 2 percent slopes.[49] GyA and HcA soils are in hydrologic soil Group A, which have a high infiltration rate and low runoff potential and consist of deep, well-drained, sands and gravels. The proposed project would require the excavation and movement of on-site soils, which could provide for runoff or erosion issues. However, the soil types of Group A have a high infiltration rate and are less susceptible to erosion compared to other soil groups.

Prior to the issuance of grading permits, the project applicant would be required to prepare and submit detailed grading plans. These plans must be prepared in conformance with applicable standards of the City's Grading Ordinance. Development of the project site would involve more than 1 acre of ground disturbance; therefore, the proposed project is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit. A Storm Water Pollution Prevention Plan (SWPPP) would also be required to address erosion and discharge impacts associated with the proposed on-site grading by implementing appropriate best management practices (BMPs). The project Applicant/Developer would be required to adhere to the SWPPP which would require the implementation of BMPs, including erosion control measures, to minimize construction impacts. Additionally, upon completion of all construction activities, all areas of temporary disturbance would be restored and revegetated. The proposed project would have a **less than significant** impact associated with soil erosion. No mitigation is required.

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

Response:
Less Than Significant Impact. As discussed under Checklist Responses VII(a.iii) and VII(a.iv), liquefaction and landslides are not significant hazards at the project site. Lateral spreading refers to ground or slope deformation due to the presence of weak or liquefiable soils in the subsurface combined with strong seismic shaking. Due to the absence of any slope or channel within or near the project site,

[47] Ibid.
[48] City of Moreno Valley. 2006. City of Moreno Valley General Plan. Chapter 6-Safety-Section 6.5 – Geologic Hazards. Page 6-19. July.
[49] United States Department of Agriculture, Natural Resources Conservation Service (USDA NRCS). 2024. Web Soil Survey. Website: https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm (accessed December 13, 2024).

the potential for lateral spreading at the site is considered to be very low.[50] Subsidence is the sudden sinking or gradual downward settling of the earth's surface with little or no horizontal motion. Subsidence is caused by a variety of activities, which includes (but is not limited to) withdrawal of groundwater, pumping of oil and gas from underground, the collapse of underground mines, liquefaction, and hydro-compaction. The proposed project does not include the withdrawal of groundwater or other resources from underground sources. Settlement ("seismic compaction") of loose to medium-dense clean dry sands can occur during seismic shaking.

The *Geotechnical Engineering Exploration and Analysis*[51] prepared for the project includes project-specific recommendations and construction specifications that meet or exceed seismic design requirements. The specific design recommendations described in the final report would be incorporated into all project-related construction documents. Adherence to the specific design recommendations described in the report would ensure that impacts related to on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse remain **less than significant**. No mitigation is required.

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

Response:
Less Than Significant Impact. Expansive soils generally have a significant amount of clay particles, which can give up water (shrink) or take on water (swell). The change in volume exerts stress on buildings and other loads placed on these soils. The extent of shrink/swell is influenced by the amount and kind of clay in the soil. The occurrence of these soils is often associated with geologic units having marginal stability. The distribution of expansive soils can be widely dispersed, and they can occur in hillside areas as well as low-lying alluvial basins. On-site soils were identified to have a very low expansion potential. However, there may be localized, discontinuous layers of clayey soils with higher expansion potential. The specific design recommendations described in the *Geotechnical Engineering Exploration and Analysis* would be incorporated into all project-related construction documents to meet or exceed seismic design requirements.[52] Adherence to the specific design recommendations described in the final geotechnical report would ensure that impacts related to expansive soils remain **less than significant**. Mitigation is not required.

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

Response:
No Impact. The proposed project is expected to connect to existing sewer infrastructure. The project would not use septic tanks or other alternative wastewater disposal systems. Therefore, the development of the proposed project would have **no impact** related to this issue. Mitigation is not required.

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

Response:
Less Than Significant with Mitigation Incorporated. California Administrative Code, Title 14, Section 4307 states that no person shall remove, injure, deface or destroy any object of paleontological, archaeological, or historical interest or value. Compliance with Section 4307 is required for all development and would apply to the project as a matter of regulatory policy. As described in the City's General Plan Final Program Environmental Impact Report (EIR),[53] the City's Planning Area contains sedimentary rock-units (Mt. Eden Formation and San Timoteo Formation) that have the potential to contain significant nonrenewable paleontological resources. Figure 5.10-3 of the City's Final Program EIR indicates that the project site is not underlain by these two sedimentary rock-units and that there is a low potential for sensitive paleontological resources to occur on the project site. Given the site's history of disturbance, the potential for undiscovered paleontological resources is considered low. Construction of the project is not expected to impact, either directly or indirectly, any known unique paleontological

[50] Giles Engineering Associates, Inc. 2024. *Geotechnical Engineering Exploration and Analysis*. May.
[51] Giles Engineering Associates, Inc. 2024. *Geotechnical Engineering Exploration and Analysis*. May.
[52] Ibid.
[53] City of Moreno Valley. 2006. City of Moreno Valley General Plan Final Program EIR. Chapter 5.10 – Cultural Resources. July.

resource or site of unique geologic features. However, ground-disturbing activities at the project site still have the potential to disturb previously unknown subsurface resources. **Mitigation Measure GEO-1** would ensure the project paleontologist is engaged to evaluate the significance of any paleontological resources identified during ground-disturbing activities. With implementation of **Mitigation Measure GEO-1** paleontological resources impacts would be **less than significant with mitigation incorporated.**

Mitigation Measure GEO-1 If paleontological resources (fossils) are discovered during project grading, work shall be halted within 100 feet of the find until a qualified paleontologist assesses the significance of the find. Work occurring outside of the 100-foot buffer zone may continue. The project paleontologist shall monitor remaining earthmoving activities at the project site and shall be equipped to record and salvage fossil resources that may be unearthed during grading activities. The paleontologist shall be empowered to temporarily halt or divert grading equipment to allow recording and removal of the unearthed resources. Any fossils found shall be evaluated in accordance with the *State CEQA Guidelines* and offered for curation at an accredited facility approved by the City of Moreno Valley. Once grading activities have ceased or the paleontologist determines that monitoring is no longer necessary, monitoring activities shall be discontinued. This measure shall be implemented to the satisfaction of the City Planning Division.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.5 – Geologic Hazards
     - Figure 6-3 – Geologic Faults & Liquefaction
   - Chapter 7 – Conservation Element – Section 7.4 -- Soils
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.6 – Geology and Soils
     - Figure 5.6-1 – Geology
     - Figure 5.6-2 – Seismic Hazards
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Chapter 8.21 – Grading Regulations
5. Local Hazard Mitigation Plan, City of Moreno Valley Fire Department, adopted October 4, 2011, amended 2017, http://www.moval.org/city_hall/departments/fire/pdfs/haz-mit-plan.pdf
   - Chapter 4 – Earthquake
     - Figure 4-1 – Right-Lateral Strike -Slip Fault
     - Figure 4-1.1 – Moreno Valley Geologic Faults and Liquefaction 2016
     - Figure 4-1.2 – Moreno Valley Area Ground Shaking Map
   - Chapter 8 – Landslide
     - Figure 8-1 – Moreno Valley Slope Analysis 2016
6. Emergency Operations Plan, City of Moreno Valley, March 2009, http://www.moval.org/city_hall/departments/fire/pdfs/mv-eop-0309.pdf
   - Threat Assessment 1 – Major Earthquakes
     - Figure 9 – Types of Faults
     - Figure 10 – Earthquake Faults
     - Figure 11 – Comparison of Richter Magnitude and Modified Mercalli Intensity
     - Figure 12 – Magnitude 4.5 or Greater Earthquake Map
     - Figure 13 – Geologic Faults and Liquefaction

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Response:

Less Than Significant Impact. This section discusses the project's impacts related to the release of greenhouse gas (GHG) emissions for the construction and operational phases of the project. Construction and operational GHG emissions were estimated using the California Emissions Estimator Model (CalEEMod) (refer to Appendix A) using the same methodology for the criteria pollutants described in Section III, Air Quality.

State CEQA Guidelines Section 15064(b) provides that the "determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data," and further states that an "ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting."

Appendix G of the *State CEQA Guidelines* includes significance thresholds for GHG emissions. A project would normally have a significant effect on the environment if it would do either of the following:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, South Coast Air Quality Management District (SCAQMD) has convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting modified in September 2010 (Meeting No. 15),[54] SCAQMD proposed to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency:

- **Tier 1—Exemptions:** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.
- **Tier 2—Consistency with a Locally Adopted GHG Reduction Plan:** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.
- **Tier 3—Numerical Screening Threshold:** If GHG emissions are less than the numerical screening-level threshold, project-level and cumulative GHG emissions are less than significant.

  For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. SCAQMD, under Option 1, is proposing a "bright-line" screening-level threshold of 3,000 metric tons of carbon dioxide equivalent (MT CO_2e) per year (or MT CO_2e/yr) for all land use types or, under Option 2, the following land use-specific thresholds: 1,400 MT CO_2e for commercial projects; 3,500 MT CO_2e for residential projects; or 3,000 MT CO_2e for mixed-use projects. This bright-line threshold is based on a review of the Governor's Office of Planning and Research (OPR) database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds identified above. Therefore, projects that do not exceed the bright-line threshold would have a nominal and therefore less than cumulatively considerable impact on GHG emissions.

[54] South Coast Air Quality Management District (SCAQMD). 2010. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15. September 28. Website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf (accessed January 2025).

- **Tier 4—Performance Standards:** If emissions exceed the numerical screening threshold, a more detailed review of the project's GHG emissions is warranted. The SCAQMD has proposed an efficiency target for projects that exceed the bright-line threshold. The current recommended approach is per-capita efficiency targets. The SCAQMD is not recommending use of a percentage emissions reduction target. Instead, the SCAQMD proposes proposed a 2035 efficiency target of 3.0 MT CO_2e/yr per service population for project-level analyses and 4.1 MT CO_2e/yr per service population for plan-level projects (e.g., program-level projects such as General Plans).

For the purpose of this analysis, the proposed project will be compared to the threshold of 3,000 MT CO_2e/yr for all land use types. The proposed project is also evaluated for compliance with the City's Climate Action Plan (CAP), the 2022 Scoping Plan, and the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Construction Greenhouse Gas Emissions. Construction activities associated with the proposed project would produce combustion emissions from various sources. Construction would emit GHGs through the operation of construction equipment and from worker and builder supply vendor vehicles for the duration of the approximately 12-month construction period. The combustion of fossil-based fuels creates GHGs such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Furthermore, the fueling of heavy equipment emits CH_4. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change. As indicated above, SCAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, lead agencies are required to quantify and disclose GHG emissions that would occur during construction. The SCAQMD then requires the construction GHG emissions to be amortized over the life of the project (which is defined as 30 years), added to the operational emissions, and compared to the applicable interim GHG significance threshold tier. Based on the CalEEMod results, it is estimated that the project would generate 448.0 MT CO_2e during construction of the project. When amortized over the 30-year life of the project, annual emissions would be 14.9 MT CO_2e.

Operational Greenhouse Gas Emissions. Long-term operation of the proposed project would generate GHG emissions from area, mobile, waste, and water sources, as well as indirect emissions from sources associated with energy consumption. Mobile-source GHG emissions would include project-generated vehicle trips associated with trips to the proposed project. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site and other sources. Waste-source emissions generated by the proposed project include energy generated by landfilling and other methods of disposal related to transporting and managing project-generated waste. In addition, water-source emissions associated with the proposed project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment. GHG emissions were estimated using CalEEMod. Table G shows the estimated operational GHG emissions for the proposed project. Motor vehicle emissions are the largest source of GHG emissions for the project, at approximately 43 percent of the project total. Energy sources are the next largest category, at approximately 30 percent. Water and waste sources are about 18 percent and 8 percent of the total emissions, respectively. Area-source emissions also make up less than 1 percent of the total emissions.

Table G: Greenhouse Gas Emissions

Emission Type	Operational Emissions (MT/yr)				
	Total CO_2	**CH_4**	**N_2O**	**CO_2e**	**Percentage of Total**
Mobile Source	212.8	<0.1	<0.1	216.7	43
Area Source	2.7	<0.1	<0.1	2.7	<1
Energy Source	152.0	<0.1	<0.1	152.6	30
Water Source	60.2	1.0	<0.1	92.3	18
Waste Source	11.1	1.1	0.0	38.7	8
Total Operational Emissions				**503.0**	**100.0**
Amortized Construction Emissions				14.9	—
Total Annual Emissions				**517.9**	**—**
SCAQMD Threshold				**3,000**	
Exceedance?				**No**	

Source: Compiled by LSA (January 2025).

CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
GHG = greenhouse gas
MT/CO_2e = metric tons of carbon dioxide equivalent
MT/yr = metric tons per year
N_2O = nitrous oxide
SCAQMD = South Coast Air Quality Management District

As discussed above, a project would have less than significant GHG emissions if it would result in operational GHG emissions of less than 3,000 MT CO_2e/yr. Based on the analysis results, the proposed project would result in approximately 517.9 MT CO_2e/yr, which would not exceed the SCAQMD threshold of 3,000 MT CO_2e/yr. Therefore, operation of the proposed project does not have the potential to generate significant GHG emissions that would have a significant effect on the environment. Impacts would be **less than significant**, and no mitigation is required.

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

Response:

Less Than Significant Impact. The following discussion evaluates the proposed project according to the goals of the City's Climate Action Plan (CAP), the 2022 Scoping Plan, and SCAG's 2024–2050 RTP/SCS.

City of Moreno Valley CAP. The City of Moreno Valley is currently in the process of updating its latest CAP as part of adopting the 2040 General Plan Update.[55] The City's CAP is designed to reinforce the City's commitment to reducing GHG emissions and demonstrate how the City will comply with State of California's GHG emission reduction standards. The CAP has been prepared concurrently with the updated Moreno Valley General Plan, reflecting the City's most current land use and transportation strategy, and GHG implications of various General Plan's goals and policies. While there is no sunset year for the CAP, the CAP provides analysis of GHG emissions to the year 2040, which is the General Plan horizon year. The following reduction measures from the City's CAP will be applicable to the proposed project: Implement trip reduction programs in new residential, commercial, and mixed-use developments. Expand efforts to install energy efficient lighting technologies in new and existing private parking lots.

- Facilitate energy efficiency improvements in nonresidential buildings through incentives and regulations that may include energy performance reports, time of sale upgrades, and/or innovative partnerships such as expansion of utility provider (e.g., MVU, SCE, SoCalGas) programs to reduce energy use.
- Encourage residents and businesses to use efficient lawn and garden maintenance equipment or to reduce the need for landscape maintenance through native planting.
- Reduce emissions from heavy-duty construction equipment by limiting idling based on SCAQMD requirements and utilizing cleaner fuels, equipment, and vehicles.
- Require new landscaping to be climate appropriate.

The proposed project would construct a 130,764-square-foot, three-story, self-storage facility and associated site improvements including 19,437 square feet of landscaping. The proposed project would be consistent with the CAP goal of increasing energy efficiency in new buildings by complying with the latest California Building Code (Title 24), including the latest California Green Building Standards Code (CALGreen Code) standards. In addition, the proposed project would comply with local and State laws regarding solar energy and would be designed to be all-electric, consistent with the CAP goals. The proposed project would also use drought tolerant landscaping that requires low water and maintenance. Therefore, the project would also be consistent with the CAP goal of increased canopy and tree count. Based on the Trip Generation and Vehicle Miles Traveled (VMT) Analysis[56] (Appendix J), the proposed project would be screened out from a VMT analysis and presumed to have a less than significant transportation impact. Therefore, the proposed project would not be implementing a trip reduction program. As such, the proposed project would be generally consistent with applicable CAP measures.

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[55] The 2040 General Plan Update was effective immediately upon adoption in June 2021. However, an environmental group subsequently filed a lawsuit challenging its adoption. In May 2024, the Riverside County Superior Court ruled in the lawsuit, directing the City to set aside the 2040 General Plan Update, including related changes to the Zoning Ordinance, its Climate Action Plan (CAP), and certification of its EIR until errors identified in the EIR's analysis of air quality, greenhouse gas, and energy use impacts, and in its CAP, are rectified (*Sierra Club v. City of Moreno Valley, et al*., Riverside County Superior Court No. CVRI2103300). The project's preliminary application was submitted on April 29, 2024, when the 2040 General Plan was in effect. This IS/MND is prepared as a stand-alone project analysis, which does not tier from the 2040 General Plan EIR or any other EIR document. It contains its own separate analysis of the environmental implications of the project. The IS/MND's incorporation by reference of the 2040 General Plan does not affect the IS/MND's adequacy under CEQA, or any other law or regulation. In addition, if the prior 2006 General Plan and Final EIR is the effective General Plan when the project goes before the City Council, the IS/MND also includes analysis of the project's consistency with that prior plan.

[56] LSA Associates, Inc. 2024. *Trip Generation and Vehicle Miles Traveled Analysis for the Public Storage Moreno Valley Project*. October.

2022 Scoping Plan. Executive Order (EO) B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. Senate Bill (SB) 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reduction target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. The California Air Resources Board (CARB) released the 2017 Scoping Plan to reflect the 2030 target set by EO B-30-15 and codified by SB 32.[57] SB 32 builds on Assembly Bill (AB) 32 and keeps us on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels. AB 197, the companion bill to SB 32, provides additional direction to CARB that is related to the adoption of strategies to reduce GHG emissions. Additional direction in AB 197 that is intended to provide easier public access to air emission data collected by CARB was posted in December 2016. AB 1279 codifies the State goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter. In addition, the 2022 Scoping Plan[58] assesses progress toward the statutory 2030 target while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

- **Energy-efficient measures** are intended to maximize energy-efficiency building and appliance standards, pursue additional efficiency efforts (including new technologies and new policy and implementation mechanisms), and pursue comparable investment in energy efficiency from all retail providers of electricity in California. In addition, these measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The proposed project would not be powered by natural gas, and no natural gas demand is anticipated during construction or operation of the proposed project. The elimination of natural gas in new development would help projects implement their "fair share" of achieving long-term 2045 carbon neutrality consistent with State goals. As such, if a project does not utilize natural gas, a lead agency can conclude that it would be consistent with achieving the 2045 neutrality goal and will not have a cumulative considerable impact on climate change. In addition, the proposed project would comply with the latest Title 24 standards regarding energy conservation and green building standards. Therefore, the proposed project would comply with applicable energy measures.
- **Water conservation and efficiency measures** are intended to continue efficiency programs and use cleaner energy sources to move and treat water. Increasing the efficiency of water transport and reducing water use would reduce GHG emissions. As noted above, the project would be required to comply with the latest Title 24 standards, which include a variety of different measures, including reduction of wastewater and water use. The proposed project would also include new drought tolerant landscaping that requires low water and maintenance. In addition, the proposed project would be required to comply with the California Model Water Efficient Landscape Ordinance. Therefore, the proposed project would not conflict with any of the water conservation and efficiency measures.
- The goal of **transportation and motor vehicle measures** is to develop regional GHG emission reduction targets for passenger vehicles. Specific regional emission targets for transportation emissions would not directly apply to the proposed project. However, vehicles traveling to the project site would comply with the Pavley II (LEV III) Advanced Clean Cars Program (Pavley standards). The second phase of Pavley standards will reduce GHG emissions from new cars by 34 percent from 2016 levels by 2025. Therefore, the proposed project would not conflict with the identified transportation and motor vehicle measures.

The proposed project would comply with existing State regulations adopted to achieve the overall GHG emission reduction goals identified in the 2022 Scoping Plan, EO B-30-15, SB 32, AB 197, and AB 1279.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy. SCAG's 2024–2050 RTP/SCS identifies land use strategies that focus on new housing and job growth in areas served by high-quality transit, and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2024–2050 RTP/SCS is to better manage the existing transportation system through design management strategies,

[57] California Air Resources Board (CARB). 2022. *2022 Scoping Plan for Achieving Carbon Neutrality.* December. Website: https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf (accessed January 2025).

[58] California Air Resources Board (CARB). 2017. *California's 2017 Climate Change Scoping Plan*. November.

integrate land use decisions and technological advancements, create complete streets that are safe for all roadway users, preserve the transportation system, expand transit, and foster development in transit-oriented communities. The 2024–2050 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as providing a forecast development pattern that is generally consistent with regional-level General Plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2024–2050 RTP/SCS, would reach the regional target of reducing GHG emissions from automobiles and light-duty trucks by 19 percent by 2035 (compared to 2005 levels). The 2024–2050 RTP/SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the 2024–2050 RTP/SCS, but it provides incentives for consistency for governments and developers. Implementing SCAG's RTP/SCS will greatly reduce the regional GHG emissions from transportation, thereby helping to achieve statewide emissions reduction targets. The proposed project would construct a 130,764-square-foot public self-storage building and associated site improvements. As demonstrated in the Consistency with Applicable Air Quality Plans in Section III, Air Quality, the proposed project does not meet the criteria identified in *State CEQA Guidelines* Section 15205.b.2 (Projects of Statewide, Regional, or Areawide Significance) for projects of Statewide, regional, or areawide significance. The proposed project would require a zone change to change the zoning designation of the project site from NC to CC and a CUP to allow development of the proposed project within the CC zone. The proposed project has the potential to employ up to 4 employees, some of which may already reside in Moreno Valley. According to SCAG's 2024–2050 RTP/SCS, Moreno Valley households and employment are forecast to increase by approximately 21,900 households and 38,700 jobs, respectively, between 2019 and 2050.[59] According to SCAG, up to 4 employees would represent approximately 0.0001 percent of the city's forecasted employment growth from 2019 to 2050. As such, the proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction target of 19 percent below 2005 per capita emissions levels by 2035. Furthermore, the proposed project is not regionally significant per *State CEQA Guidelines* Section 15206 and, as such, it would not conflict with the SCAG RTP/SCS targets because those targets were established and are applicable on a regional level. Therefore, it is anticipated that implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS.

The proposed project would be consistent with applicable plans and programs designed to reduce GHG emissions. Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Impacts would be **less than significant**, and no mitigation is required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. California's 2017 Climate Change Scoping Plan, prepared by the California Air Resources Board, November 2017, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, accessed April 24, 2019

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

Response:

Less Than Significant Impact. The transport, use, and storage of hazardous materials during the construction and operation of the site would be conducted pursuant to all applicable local, state and federal laws, and in cooperation with the Riverside County Fire Department, Riverside County Department of Environmental Health, Hazardous Materials Division (DEH), Environmental Protection

[59] Southern California Association of Governments (SCAG). 2024. *2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. Demographics and Growth Forecast*, Technical Report, Table 13. Adopted April 4, 2024.

and Oversight Division, and California Occupational Safety and Health Administration. Additionally, the United States Department of Transportation Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials by truck and rail on State highways and rail lines, as described in Title 49 of the Code of Federal Regulations (CFR) and implemented by Title 13 of the California Code of Regulations (CCR).

During demolition and construction activities for the project, there is a possibility of generating small quantities of hazardous materials. The construction phase of the project would include the transport, storage, and short-term use of petroleum-based fuels, lubricants, pesticides, and other similar materials. The amount of hazardous chemicals present during construction is limited and would be in compliance with existing government regulations, such as the Hazardous Materials Transportation Act, the Resource Conservation and Recovery Act, and the CCR, Title 22.

Any associated risk would be adequately reduced to a level that is less than significant through compliance with these standards and regulations; thus, the limited use and storage of hazardous materials during construction of the project would not pose a significant hazard to the public or the environment. Accordingly, the potential for the release of hazardous materials during project construction would be low and, even if a release were to occur, it would not result in a significant hazard to the public, surrounding land uses, or environment due to the small quantities of these materials associated with construction.

The project would not emit hazardous emissions or involve hazardous or acutely hazardous materials, substances, or waste. However, the project could involve the use of materials associated with routine property maintenance, such as janitorial supplies for cleaning purposes and/or herbicides and pesticides for landscaping. Pursuant to the Federal Hazard Communication Standard (29 CFR 1910.1200) and the Laboratory Standard (29 CFR 1910.1450), Safety Data Sheets (SDS) outlining procedures to address spills and leaks for individual chemicals would be used to conduct chemical safety training for all employees who work with chemicals in order to minimize the occurrence of accidental chemical releases and ensure that, when one does occur, it is handled in a safe manner. These uses would not involve the routine transport, use, or disposal of quantities of hazardous materials that could create a significant hazard to the public or environment. Additionally, as described in the leasing agreements required for customers of the storage facilities, storage of hazardous materials is not permitted. The hazardous materials used during operations would be stored off site and would be handled and disposed of in accordance with applicable regulations.

The regulations discussed above inherently safeguard life and property from the hazards of fire/explosion arising from the storage, handling, and use of hazardous substances, materials, and devices, as well as hazardous conditions due to the use or occupancy of buildings. Through compliance with all applicable federal, State, and local laws, impacts to the public or environment from the routine transportation, use, and disposal of hazardous materials would be **less than significant**. No mitigation is 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:

Less Than Significant Impact. Refer to Checklist Response IX(a). As described in the Phase I Environmental Assessment[60] prepared for the project, the project site was in agricultural use from approximately 1938 to 1997. The project site has been a vacant lot since 1997. Given the prior agricultural use on site, there is a potential for residual amounts of pesticides and/or herbicides to exist on site. According to the Phase I Environmental Assessment, based on the length of time since agricultural activity occurred on site, the likelihood that residual chemicals would be found above cleanup levels is low. Therefore, it was determined that the potential past use of pesticides and/or fertilizers does not present a recognized environmental condition (REC) to the project site.

The project would involve construction activities, including excavation, grading, and site preparation. As discussed in Checklist Response IX(a), during construction activities, the Applicant/Developer would be required to comply with relevant applicable federal, and local laws and regulations that pertain to hazardous materials and waste during construction and operation of the project. Therefore, the project

[60] Apex Companies, LLC. 2024. *Phase I Environmental Site Assessment Conducted on CA24007 Alessandro Boulevard and Indian Street, Moreno Valley, California 92553*. April.

would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be **less than significant**. No mitigation is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒

Response:
No Impact. The nearest existing or proposed schools are the Ramona Elementary School located at 24801 Bay Avenue approximately 0.28 mile northeast of the project site and Sunnymead Montessori School located at 24851 Bay Avenue approximately 0.36 mile northeast of the project site. Neither of these schools are within 0.25 mile of the project site. As discussed in Checklist Response IX(b), the project would not result in a significant hazard affecting the public during project construction or operation. Furthermore, operation of the project would not result in significant impacts associated with hazardous materials because all materials would be handled, stored, and disposed of in accordance with applicable standards and regulations. Therefore, because the project does not involve activities that would result in the emissions of hazardous materials or acutely hazardous substances, and because the closest school is greater than 0.25 mile away from the project site, **no impact** would occur, and no mitigation is required.

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

Response:
No Impact. According to the EnviroStor website,[61] no hazardous material sites were identified on or adjacent to the project site. Six sites were identified within 1 mile of the project site, and all sites were school investigations. The closest site is the Ramona Elementary School approximately 0.28 mile northeast of the project site. The site type was a school investigation with a "no further action determination" as of August 19, 2003.

Review of the State Water Resources Control Board (SWRCB) GeoTracker database confirms that the project site is not on a Leaking Underground Storage Tank (LUST) Cleanup site.[62] According to the GeoTracker database, there are four LUST sites within 0.5 mile of the project site; however, remediation activities have been completed on all four sites and classified as "case-closed", which means that a closure letter or other formal closure decision document has been issued. As such, none of these LUST cases represent a REC affecting the project site. The project site is not located on a list of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit[63] or active cease and desist orders and cleanup and abatement orders.[64] The Phase I Environmental Site Assessment[65] corroborates that the project site is not listed on any federal, tribal, or State-equivalent databases for hazardous sites. All use, storage, transport and disposal of hazardous materials (including any small amounts of hazardous wastes) during construction and operational activities will be completed in accordance with existing local, State, and federal hazardous materials regulations. Because the project site is not listed on the Department of Toxic Substances Control (DTSC) Hazardous Waste and Substances Site List (Cortese List, compiled pursuant to Section 65962.5 of the Government Code),[66] **no impact** related to this topic would occur. No mitigation is required.

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61 California Department of Toxic Substances Control (DTSC). 2024. EnviroStor, Site/Facility Search. Website: https://www.envirostor.dtsc.ca.gov/public/map/?global_id=60000502 (accessed December 16, 2024).

62 State Water Resources Control Board (SWRCB). 2024. GeoTracker database. Website: https://geotracker.waterboards.ca.gov/map/ (accessed December 16, 2024).

63 California Environmental Protection Agency (CalEPA).2024-a. Sites Identified with Waste Constituents above Hazardous Waste Levels Outside the Waste Management Unit. Website: https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf (accessed December 16 24, 2024).

64 California Environmental Protection Agency (CalEPA). 2024-b. Cortese List Data Resources. Website: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/ (accessed December 16, 2024).

65 Apex Companies, LLC. Phase I Environmental Site Assessment conducted on CA24007 Alessandro Boulevard and Indian Street, Moreno Valley, California 92553. April.

66 California Environmental Protection Agency (CalEPA). 2024.-b. Cortese List Data Resources. Website: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/ (accessed December 16, 2024).

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

Response:

Less Than Significant Impact. The closest airport is the March Air Reserve Base/Inland Port Airport (MARB/IPA) located approximately 2.35 miles southwest of the project site. The project site is not located within an air crash hazard zone.[67] Airport Land Use Compatibility Plans (ALUCPs) provide guidance to ensure that land development around an airport is compatible with airport operations, protecting public safety by limiting incompatible land uses near flight paths, thereby safeguarding the airport's functionality and the surrounding community from noise and safety hazards associated with aircraft operations. According to the MARB/IPA ALUCP, the project site is in Compatibility Zone E. Properties within Compatibility Zone E are subject to low noise levels associated with aircraft operations. Occasional overflights may be intrusive to some outdoor activities in Compatibility Zone E. The only prohibited uses in this zone are hazards to flight, which include physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations and development that may cause attraction of birds to increase. Development conditions in this zone include disclosure of airport proximity and existence of overflights for residential properties.[68] The proposed self-storage facility would not include any physical, visual, or electronic forms of interference, nor would it include residential uses. The project would be consistent with the applicable development regulations and design standards of the ALUCP and would not result in a safety hazard or excessive noise levels for people residing or working in the area. Therefore, impacts would be **less than significant**, and no mitigation is required.

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

Response:

Less Than Significant Impact. The project site is currently vacant and unoccupied. Construction activities that could temporarily restrict vehicular traffic would incorporate appropriate measures to facilitate the passage of persons and vehicles through/around any temporary road closures in accordance with the California Fire Code. During construction, standard traffic control devices such as warning signs, warning lights, and flaggers will be utilized as applicable to minimize obstructions and ensure the safe passage of emergency vehicles as necessary for the purposes of coordinating efforts during local, State, and/or federal emergency events, including response to hazardous materials incidents. Implementation of these traffic control measures will include guidance and navigational tools on the streets adjacent to the project site in order to maintain traffic flow and safety during construction.

Vehicular access to the project site would be provided via Indian Street and the existing shared access driveway south of the proposed self-storage building. The access driveway would lead to two access gates, one on the east side of the proposed self-storage building facilitating access to the northern portion of the project site, and the other also on the east side of the proposed self-storage building facilitating access to the eastern portion of the project site. Fire department emergency vehicle apparatus access road locations and design shall be in accordance with the California Fire Code, Riverside County Ordinance No. 787, and Moreno Valley/Riverside County Fire Department Standards to ensure proper roadway turning radii, and fire lane widths, etc. Additionally, the project site layout includes provisions for emergency vehicle access, which also would be reviewed for adequacy by the Moreno Valley/Riverside County Fire Department. Therefore, impacts would be **less than significant**, and mitigation is not required.

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

Response:

[67] City of Moreno Valley. 2006. City of Moreno Valley General Plan. Chapter 6-Safety-Section 6.10 – Air Crash Hazards. Figure 6-5. July.

[68] Riverside County Airport Land Use Commission (ALUC). 2014. March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Map MA-1: Compatibility Map. Website: https://rcaluc.org/sites/g/files/aldnop421/files/2023-06/March.pdf (accessed January 7, 2025).

No Impact. Fire hazard severity zone maps published by the California Department of Forestry and Fire Protection (CAL FIRE) do not identify the project site as being within or adjacent to a moderate, high, or very high fire hazard severity zone.[69] The nearest fire hazard severity zones to the project site are approximately 2.7 miles northeast and southeast of the project site. Therefore, the proposed project would not expose people or property to new increased wildland fire risks. Therefore, there would be **no impact** relating to exposure of people or structures to wildland fires from project implementation. No mitigation is required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.2.8 – Wildland Urban Interface
   - Chapter 6 – Safety Element – Section 6.9 – Hazardous Materials
   - Chapter 6 – Safety Element – Section 6.10 – Air Crash Hazards
     - Figure 6-5 – Air Crash Hazards
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.5 – Hazards and Hazardous Materials
     - Figure 5.5-1 – Hazardous Materials Sites
     - Figure 5.5-2 – Floodplains and High Fire Hazard Areas
     - Figure 5.5-3 – City Areas Affected by Aircraft Hazard Zones
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. March Air Reserve Base (MARB)/March Inland Port (MIP) Airport Land Use Compatibility Plan (ALUCP) on November 13, 2014, http://www.rcaluc.org/Portals/13/17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf?ver=2016-08-15-145812-700
5. Local Hazard Mitigation Plan, City of Moreno Valley Fire Department, adopted October 4, 2011, amended 2017, http://www.moval.org/city_hall/departments/fire/pdfs/haz-mit-plan.pdf
   - Chapter 5 – Wildland and Urban Fires
     - Figure 5-2 – Moreno Valley High Fire Area Map 2016
   - Chapter 12 – Dam Failure/Inundation
     - Figure 12-2 Moreno Valley Evacuation Routes Map 2015
   - Chapter 13 – Pipeline
     - Figure 13-1 – Moreno Valley Pipeline Map 2016
   - Chapter 14 – Transportation
     - Figure 14-1.1 – Moreno Valley Air Crash Hazard Area Map 2016
   - Chapter 16 – Hazardous Materials Accident
     - Moreno Valley Hazardous Materials Site Locations Map 2016
6. Emergency Operations Plan, City of Moreno Valley, March 2009, http://www.moval.org/city_hall/departments/fire/pdfs/mv-eop-0309.pdf
   - Hazard Mitigation and Hazard Analysis
   - Threat Assessment 2 – Hazardous Materials
   - Threat Assessment 3 – Wildfire
   - Threat Assessment 6 – Transportation Emergencies
     - Figure 17 – Air Crash Hazards

[69] California Department of Forestry and Fire Protection (CAL FIRE). 2007, 2024. Fire Hazard Severity Zone Viewer. Website: https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/ (accessed December 18, 2024).

X. HYDROLOGY AND WATER QUALITY – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

Response:

Less Than Significant Impact. The proposed project includes development of a 130,764-square-foot, three-story, self-storage building and associated parking. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and transport of sediment downstream compared to existing conditions. During a storm event, soil erosion could occur at an accelerated rate. In addition, construction-related pollutants such as chemicals, liquid and petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste could be spilled, leaked, or transported via stormwater runoff into nearby drainages and into downstream receiving waters. Runoff water quality is regulated by the National Pollutant Discharge Elimination System (NPDES) Program (established through the federal Clean Water Act [CWA]). The NPDES program objective is to control and reduce pollutant discharges to surface water bodies. Compliance with NPDES permits is mandated by State and federal statutes and regulations. Locally, the NPDES Program is administered by the Santa Ana RWQCB.

Construction of the project would disturb greater than 1 acre of soil; therefore, construction activities would be subject to the State Water Resource Control Board's (SWRCB) NPDES *General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities* (Construction General Permit), Order No. 2022-0057-DWQ, NPDES No. CAS000002. The Construction General Permit regulates stormwater discharges from construction sites that result in disturbance of at least 1 acre of soil, and/or are smaller sites that are part of a larger common plan of development. The Construction General Permit requires the project Applicant/Developer to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). As part of the SWPPP, the project shall identify best management practices (BMPs) to address water quality impacts associated with construction activities. Construction BMPs would include, but not be limited to, erosion control and sediment control BMPs designed to minimize erosion and retain sediment on site and good housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. The SWPPP would be developed, and construction BMPs selected and implemented, to target pollutants of concern during construction. The construction BMPs would be designed to retain sediment and other pollutants on site so they would not reach receiving waters or degrade beneficial uses. Therefore, the project would comply with the provisions of the Construction General Permit.

Additionally, the project would be required to comply with the provisions of City Municipal Code Section 8.21.160, Erosion Control, which requires preparation of an Erosion Control Plan for all earthmoving and grading activities. The Erosion Control Plan would describe the construction BMPs that would be implemented to control runoff, erosion, and sediment movement during construction.

According to the *Geotechnical Engineering Exploration and Analysis* (Appendix E)[70] prepared for the project, groundwater was encountered during exploratory borings at depths of 36 feet below ground surface. Construction would include excavation to depths of at least 5 feet below the proposed grade or 3 feet below bottom of foundations and floor slab, whichever is deeper. Therefore, groundwater dewatering is not anticipated to be required during construction.

The project would develop a vacant site with a self-storage facility and would result in the increase of approximately 2.6 acres of impervious surface area. Project operations have the potential to introduce pollutants of concern in stormwater runoff and, therefore, would be subject to the requirements of the California Regional Water Quality Control Board, Santa Ana Region, *NPDES Permit and Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District, the County of Riverside, and the Incorporated Cities of Riverside County within the Santa Ana Region,* Order Number R8-2010-0033, NPDES Permit No. CAS618033, also known as the Riverside County Municipal

[70] Giles Engineering Associates Inc. 2024. *Geotechnical Engineering Exploration and Analysis*. May.

Separate Storm Sewer System (MS4) permit. The Riverside County MS4 Permit regulates the discharge of pollutants into waters of the United States (waters of the U.S.).

In compliance with the Riverside County MS4 Permit, DRC Engineering Inc. prepared a *Project Specific Preliminary Water Quality Management Plan (PWQMP)* (Appendix G),[71] which provides details regarding the proposed project's stormwater management program, including proposed BMPs to reduce or eliminate pollutants of concerns in stormwater runoff. As detailed in the PWQMP, the project would include an underground infiltration chamber, which would capture, treat, and infiltrate 100 percent of the calculated design capture volume. The infiltration chamber would include an outflow that would direct any stormwater overflow to Indian Street where it would enter the existing City storm drain system. In compliance with the Riverside County MS4 Permit, the project shall submit a Final Water Quality Management Plan (WQMP) to the City for review and approval, which would specify the project specific Site Design, Source Control, Low Impact Development (LID), and Treatment Control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff. Additionally, the project would be required to comply with the provisions of City Municipal Code Section 8.10, Stormwater/Urban Runoff Management and Discharge Controls, which requires new development projects to control stormwater runoff through implementation of BMPs such as permeable areas, landscaping, or on-site rain capture systems. Further, Section 8.10 prohibits illicit connections to the storm drain system at commercial or industrial facilities and subjects such facilities to a regular program of inspection. The project would implement BMPs to capture, treat, and reduce pollutants of concern in stormwater runoff and therefore comply with City Municipal Code Section 8.10.

Overall, because the project would be required to comply with existing regulations including the Construction General Permit, the Riverside County MS4 Permit, and City Municipal Code requirements, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be **less than significant**.

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

Response:

Less Than Significant Impact. The City is served by two water purveyors: Eastern Municipal Water District (EMWD) and the Box Springs Mutual Water Company.[72] However, EMWD supplies water to the majority of the City, including the project site. EMWD has a diverse portfolio of water supplies, including imported water from the Metropolitan Water District of Southern California (MWD), local groundwater, desalinated groundwater, and recycled water.[73] The City's main source of water supply is imported water from the MWD. According to its 2020 Urban Water Management Plan, most of EMWD's water is imported water from the MWD, which is expected to meet the demands of all member agencies through 2045.[74] The MWD determined that its water resources will continue to provide a reliable supply to its member agencies from 2020 to 2045 during normal, single-dry, and multiple-dry years.[75] As discussed in Checklist Response XIX(a), because the project would develop a self-storage facility, the project would not result in a substantial increase in demand for water. Therefore, the project would not contribute to a substantial depletion of groundwater supplies.

Development of the project would increase the impervious surface area on the project site. Impervious surfaces reduce groundwater infiltration and thereby interfere with groundwater recharge. However, the proposed project includes an underground infiltration chamber that would capture and treat runoff from impervious surface areas and allow it to infiltrate back into the soil, which would allow for continued groundwater recharge. Therefore, the project would not preclude or obstruct on-site infiltration of stormwater into the local groundwater aquifer or interfere with groundwater recharge. Impacts would **be less than significant**.

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71 DRC Engineering Inc. 2025. *Project Specific Water Quality Management Plan.* October.

72 City of Moreno Valley. 2006. Moreno Valley General Plan Final Program EIR. Section 5.13 Public Services and Utilities. July.

73 Eastern Municipal Water District (EMWD). 2021a. 2020 Urban Water Management Plan. Page 3-3. Website: https://www.emwd.org/what-we-do/water-supply/urban-water-management-plan (accessed December 30, 2024).

74 Ibid. Section 6 Water Supply Characterization. 6.2.1 Purchased or Imported Water.

75 Eastern Municipal Water District (EMWD). 2021a. *2020 Urban Water Management Plan*. Page 7-2.

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

Response:

Less Than Significant Impact. During construction activities, more than 1 acre of soil would be disturbed. Soil would be exposed and drainage patterns temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. The Construction General Permit requires the preparation of a SWPPP to identify construction BMPs to be implemented as part of the proposed project to reduce impacts on water quality during construction, including those impacts associated with soil erosion and siltation. With compliance with the requirements in the Construction General Permit and implementation of construction BMPs, construction impacts related to changes in existing drainage patterns and on- or off-site erosion or siltation would be **less than significant**.

Development of the proposed project (building and pavement) would alter the amount of existing impervious surface area and the amount of generated runoff. Currently, runoff generally drains to the southwest into an existing v-gutter to the north of the existing shared access drive aisle at the south of the site. Stormwater crosses the drive aisle and flows through an existing parkway drain directly to the south of the existing driveway and into the curb and gutter on Indian Street. Under post-development conditions, the stormwater drainage pattern would be much the same as in the existing condition. Stormwater runoff would surface drain to the parking lot area and flow into the proposed drain inlets located around the project site. Storm drain lines would then flow into an infiltration basin. The storm drain design would include a drain inlet at the south of the existing v-gutter that is crossing the shared access drive aisle that would also function as the outlet point for any overflow within the infiltration basin. At this outlet, stormwater would flow south and enter the existing parkway drain south of the shared drive aisle and enter Indian Street.[76] However, operation of the proposed project would result in an increase in impervious surfaces on the project site by approximately 2.6 acres, which could result in a net increase in stormwater runoff that could lead to downstream erosion in receiving waters. However, as discussed above, the infiltration chamber included in the project's design would be used for stormwater control and treatment in compliance with the requirements of the Riverside County MS4 Permit. Additionally, the project would implement an Erosion Control Plan that would describe the construction BMPs to be implemented to control runoff, erosion, and sediment movement during construction in compliance with City Municipal Code. With incorporation of LID techniques and hydromodification requirements as required by the Riverside County MS4 Permit and implementation of an Erosion Control Plan as required by the City Municipal Code, operational impacts related to on- or off-site erosion or siltation would be **less than significant**.

For the reasons listed above, impacts related to on- or off-site erosion or siltation would be **less than significant**, and no mitigation is required**.**

[76] DRC Engineering Inc. 2024a. *Preliminary Hydrology Study*. July.

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

Response:
Less Than Significant Impact. Refer to Checklist Response X(c.i). Development of the proposed project would result in an increase in impervious surfaces on the project site by approximately 2.6 acres, which could have the potential to increase the volume and rate of stormwater runoff discharged from the project site. However, as previously discussed, an infiltration chamber included in the project's design would be used for stormwater control and treatment in compliance with the requirements of the Riverside County MS4 Permit. The proposed drainage facilities and BMPs needed to accommodate stormwater runoff would be appropriately sized so that on-site flooding would not occur. Therefore, with implementation of LID techniques as required by the Riverside County MS4 Permit, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off site. Impacts would be **less than significant**.

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

Response:
Less Than Significant Impact. Refer to Checklist Response X(c.i). The *Preliminary Hydrology Study* (Appendix H) prepared for the project determined that implementation of the BMPs outlined in the PWQMP would decrease the ultimate amount of runoff to the existing storm drain system compared to existing conditions.[77] As detailed above, the project would implement a SWPPP to ensure the project does not generate substantial polluted runoff during construction. Additionally, the project Applicant/ Developer would be required to prepare a Final WQMP that shall demonstrate the BMPs for source control, pollution prevention, site design, LID implementation, and structural treatment control that are designed and implemented to address 303(d) listed pollutants. The BMPs shall retain the project site's minimum design capture volume in accordance with the Riverside County MS4 Permit. Therefore, impacts would be **less than significant**.

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

Response:
No Impact. The project site is not located within a Federal Emergency Management Agency (FEMA) designated 100-year floodplain. According to the FEMA Flood Insurance Rate Map (FIRM) No. 06065C0761G, the project site is located within Zone X.[78] Zone X is designated as an area determined to be outside the 500-year floodplain. As the project would not place improvements and structures directly within a 100-year floodplain, the project would not impede or redirect flood flows. Therefore, there would be **no impact** related to impeding or redirecting of flood flows, and no mitigation would be required.

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

Response:
Less Than Significant Impact. Refer to Checklist Response X(c.iv). The project site is not located within a 100-year floodplain.[79] According to the Governor's Office of Emergency Services (Cal OES), the project site is not within a tsunami hazard area.[80] According to the City's General Plan, the project site would not expose people or structures to a risk of loss, injury, or death involving the failure of a levee or dam.[81] Additionally, the project site is located 5.4 miles north of Lake Perris. At this distance, the project site is not considered susceptible to seiche-related hazards originating at Lake Perris. Since the project is not in a flood hazard, tsunami, or seiche zone, risk from release of pollutants from project inundation would be **less than significant**. Mitigation is not required.

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77 DRC Engineering Inc. 2024a. *Preliminary Hydrology Study*. July.
78 Federal Emergency Management Agency (FEMA). 2008. National Flood Hazard Layer FIRMette. Website: https://msc.fema.gov/portal/search?AddressQuery=24500%20Alessandro%20Blvd%2C%20Moreno%20Valley%2C%20CA%2092553 (accessed January 6, 2025).
79 Ibid.
80 Governor's Office of Emergency Services (Cal OES). 2024. My Hazards. Website: https://myhazards.caloes.ca.gov/ (accessed January 6, 2025).
81 City of Moreno Valley. 2006. City of Moreno Valley General Plan. Chapter 6-Safety. July.

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

Response:
Less Than Significant Impact. Refer to Checklist Responses X(a), X(b), and X(c.i). The Water Quality Control Plan for the Santa Ana River Basin (Basin Plan) designates beneficial uses for water bodies in the Santa Ana Region and establishes water quality objectives and implementation plans to protect those beneficial uses.[82] Implementation actions outlined in the Basin Plan include compliance with NPDES permit requirements. Because the project would comply with NPDES permit requirements including compliance with the Construction General Permit and the Riverside County MS4 Permit, and associated BMPs, the project would be consistent with the Basin Plan.

As previously discussed, the *Geotechnical Engineering Exploration and Analysis* prepared for the project indicates that groundwater exists at depths of 36 feet below ground surface at the project site. Construction would require excavation to a depth of approximately 5 feet below ground surface. Therefore, groundwater dewatering is not anticipated. Furthermore, the project design includes the construction of an infiltration chamber, which would capture, treat, and infiltrate stormwater from the project site and allow for continued groundwater recharge. Compliance with the Construction General Permit, the Riverside County MS4 Permit, and City Municipal Code would ensure the project would not conflict with a water quality control plan or a sustainable groundwater management plan, and impacts would remain **less than significant**. Mitigation is not required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 6 – Safety Element – Section 6.7 – Water Quality
     - Figure 6-4 – Flood Hazards
   - Chapter 7 – Conservation Element – Section 7.5 – Water Resources
     - Figure 7-1 Water Purveyor Service Area Map
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.5 – Hazards and Hazardous Materials
     - Figure 5.5-2 – Floodplains and High Fire Hazard Areas
   - Section 5.7 – Hydrology and Water Quality
     - Figure 5.7-1 – Storm Water Flows and Major Drainage Facilities
     - Figure 5.7-2 – Groundwater Basins
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
   - Section 9.10.080 – Liquid and Solid Waste
4. Moreno Valley Municipal Code Chapter 8.12 – Flood Damage Prevention
5. Moreno Valley Municipal Code Chapter 8.21 – Grading Regulations
6. Eastern Municipal Water District (EMWD) Groundwater Reliability Plus, http://gwrplus.org/
7. Eastern Municipal Water District (EMWD) 2015 Urban Water Management Plan

XI. LAND USE AND PLANNING – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒

Response:
No Impact. The project proposes the development of a self-storage facility on land with a General Plan designation of Commercial and a zoning designation of Neighborhood Commercial (NC) District. The proposed use is not allowed under the existing zoning designation of the site; therefore, the project includes a zone change to Community Commercial (CC) District. Surrounding land uses include self-storage uses to the north, residential uses to the east, commercial uses (gasoline station and auto parts store) to the south, and Indian Street and commercial/retail uses to the west. An existing self-storage facility is located immediately north of the project site, and commercial uses are located to the south and

[82] Regional Water Quality Control Board (RWQCB), Santa Ana Region. 1995. Water Quality Control Plan, Santa Ana Region. Website: https://www.waterboards.ca.gov/santaana/water_issues/programs/basin_plan/ (accessed January 6, 2025).

west (refer to Figures 1 and 2). The project is proposed on vacant property along Indian Street, north of Alessandro Boulevard, and would not introduce features such as highways or transit lines that would divide an established community. Additionally, the proposed use is consistent with several uses in the surrounding area. **No impact** regarding dividing an established neighborhood would occur. No mitigation is required.

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

Response:

Less Than Significant Impact. As previously discussed, the project includes processing a zone change from Neighborhood Commercial (NC) District to Community Commercial (CC) District, so the proposed use would be compatible with City zoning regulations. The project's proposed uses would currently not be permitted under the Neighborhood Commercial (NC) District zoning regulations. However, the proposed Community Commercial (CC) zone and self-storage use would be consistent with the Moreno Valley General Plan adopted in 2006. Further, it should be noted that the City is in the process of finalizing the adoption of its 2040 GP Update. To be consistent with the 2040 GP Update, the project site would be rezoned to Corridor Mixed Use (CMU). Although the project site's General Plan land use designation would differ from its original designation from the 2006 General Plan as analyzed in this Initial Study, and the project site would be rezoned, a Conditional Use Permit (CUP) will still be processed by the City in order to ensure uses by the proposed project would be permitted under the zoning code and consistent with the latest iteration of the City's General Plan.[83]

Pursuant to CEQA, it should be further noted that policy conflicts do not in and of themselves constitute a significant environmental impact. Policy conflicts are considered to be environmental impacts only when they would result in direct physical impacts or where those conflicts relate to avoiding or mitigating environmental impacts. As such, this Initial Study analyzes associated physical environmental impacts that could result from development of the project site with the proposed self-storage uses under each topical section. The Initial Study evaluates those impacts against the baseline condition (vacant undeveloped site) where applicable (e.g., noise, air quality) and against the previously anticipated Neighborhood Commercial (NC) District use per the City's zoning code (e.g., population and housing, growth inducement). As indicated throughout this Initial Study, the proposed project would not result in any direct physical impacts that cannot be mitigated to a less than significant level. Therefore, this impact would be **less than significant**. No additional mitigation is required.

Sources:

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

[83] The 2040 General Plan Update was effective immediately upon adoption in June 2021. However, a lawsuit challenging its adoption was subsequently filed. In May 2024, the Riverside County Superior Court ruled in the lawsuit, directing the City to set aside the 2040 General Plan Update, including related changes to the Zoning Ordinance, its Climate Action Plan (CAP), and certification of its EIR until errors identified in the EIR's analysis of air quality, greenhouse gas, and energy use impacts, and in its CAP, are rectified (*Sierra Club v. City of Moreno Valley, et al*., Riverside County Superior Court No. CVRI2103300). The Project's preliminary application was submitted April 29, 2024 when the 2040 General Plan was in effect. This IS/MND is prepared as a stand-alone project analysis, which does not tier from the 2040 General Plan EIR or any other EIR document. It contains its own separate analysis of the environmental implications of the project. The IS/MND's incorporation by reference of the 2040 General Plan does not affect the IS/MND's adequacy under CEQA, or any other law or regulation. In addition, if the prior 2006 General Plan and Final EIR is the effective General Plan when the project goes before the City Council, the IS/MND also includes analysis of the project's consistency with that prior plan.

XII. MINERAL RESOURCES – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

Response:
No Impact. The project site is currently undeveloped. According to the City's General Plan,[84] known mineral resources within the City are common materials such as sand, gravel, and rock used to make concrete and road base. Furthermore, there are no active mines within the City. The City's General Plan Final Program EIR states that there are no regionally or statewide significant mineral resources within the planning area, including the project site.[85] **No impacts** to known mineral resources would occur as a result of the proposed project, and no mitigation is required.

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

Response:
No Impact. As stated above, there are no known mineral resources within the City of Moreno Valley. The project site is currently undeveloped. No mineral extraction activities occur on the project site, and it is not located within an area known to contain locally important mineral resources. Therefore, the proposed project would not result in the loss of availability of a locally important mineral resource recovery site as delineated on a local general plan, specific plan, or other land use plan as a result of project implementation. **No impact** would occur, and no mitigation is required.

Sources:

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

XIII. NOISE – Would the project result in:

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

Response:
A detailed assessment of noise impacts for the proposed project based on the project development characteristics is included in the Noise and Vibration Impact Analysis (Appendix I).[86]

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[84] City of Moreno Valley. 2006. City of Moreno Valley General Plan. Chapter 7 – Conservation, 7.8 Mineral Resources. July.
[85] City of Moreno Valley. 2006. Moreno Valley General Plan Final Program EIR. Chapter 5.14 – Mineral Resources. July.
[86] LSA Associates Inc. 2025e. *Noise and Vibration Impact Analysis: Proposed Public Storage Moreno Valley Project in the City of*

Less Than Significant with Mitigation Incorporated.

Short-Term Noise. Two types of short-term noise would occur during project construction, including: (1) equipment delivery and construction worker commutes; and (2) project construction operations.

The first type of short-term construction noise would result from the transport of construction equipment and materials to the project site and construction worker commutes. These transportation activities would incrementally raise noise levels on access roads leading to the site. It is expected that larger trucks used in equipment delivery would generate higher noise impacts than trucks associated with worker commutes. Although there would be a relatively high single-event noise-exposure potential causing intermittent noise nuisance, the effect on longer-term ambient noise levels would be small when compared to the existing average daily traffic (ADT) volume of approximately 7,400 on Indian Street. During the overlap of the site preparation phase and grading phase, approximately 1,361 acoustically equivalent trips would occur during an average day from worker and delivery activities resulting in a traffic noise increase of approximately 0.7 A-weighted decibels (dBA). A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, short-term construction-related impacts associated with worker commutes and equipment transport to the project site would be **less than significant**.

The second type of short-term noise impact is related to noise generated during site preparation, grading, building construction, architectural coating, and paving on the project site. Construction is undertaken in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the project site. Therefore, the noise levels would vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table H lists the maximum noise levels recommended for noise impact assessments for typical construction equipment based on a distance of 50 feet between the construction equipment and a noise receptor. Typical operating cycles for these types of construction equipment may involve 1–2 minutes of full-power operation followed by 3–4 minutes at lower power settings.

Table I shows the construction phases, the expected duration of each phase, the equipment expected to be used during each phase, the composite noise levels of the equipment at 50 feet, the distance of the nearest sensitive receptor (single-family residence east of project site) from the average location of construction activities (a distance of 200 feet from the center of the project site to the façade of the home), and noise levels expected during each phase of construction.

It is expected that average noise levels during construction at the nearest sensitive receptor, the single-family residence to the east, would approach 75 dBA equivalent continuous sound level (L_{eq}) during the site preparation phase, which would occur for a duration of approximately 15 days. Average noise levels during other construction phases would range from 62 dBA L_{eq} to 74 dBA L_{eq}. These predicted noise levels would only occur when all construction equipment is operating simultaneously; therefore, these noise levels are assumed to be conservative in nature.

Table H: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor (%)	Maximum Noise Level (L_{max}) at 50 feet
Compressor	100	81
Concrete Mixer	40	85
Concrete Pump	40	85
Crane	16	83
Dozer	40	80
Forklift	20	75
Front [End] Loader	40	79
Generator	100	78
Grader	8	85
Scraper	40	88
Welder	40	74

Moreno Valley, California. February.

Source: Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances (USEPA 1971); Roadway Construction Noise Model (FHWA 2006).
ft = foot/feet
L_{max} = maximum instantaneous sound level

Table I: Construction Noise Levels by Phase

Phase	Duration (days)	Equipment	Composite Noise Level at 50 ft (dBA L_{eq})	Distance to Sensitive Receptor (ft)[1]	Noise Level at Receptor (dBA L_{eq})
Site Preparation	15	1 grader, 1 scraper, 3 dozers, and 1 tractor	87	200	75
Grading	25	1 grader, 1 dozer, and 2 tractors, and 1 excavator	86	200	74
Building Construction	200	1 crane, 2 forklifts, 1 generator set, 1 tractor, and 3 welders	84	200	72
Paving	15	1 cement and mortar mixer, 1 paver,1 paving equipment, 2 rollers, and 1 tractor	86	200	74
Architectural Coating	100	1 air compressor	74	200	62

Source: Compiled by LSA (2024).
[1] Distances are from the average location of construction activity for each phase, assumed to be the center of the project site. Residential uses to the east are 200 feet from the center of construction activity. Other buildings within the same development are further away and would be exposed to less noise.
dBA L_{eq} = average A-weighted hourly noise level
ft = foot/feet

Although the project construction-related short-term noise levels have the potential to be higher than the ambient noise in the vicinity of the project site, construction noise would cease to occur once the project construction is completed. Furthermore, the construction-related noise levels would be below the 80 dBA L_{eq} criteria established by the Federal Transit Administration (FTA) for residential uses. The project would be constructed in compliance with the requirements of the City's Noise Ordinance, which states that construction activities shall only occur between the hours of 7:00 a.m. and 8:00 p.m. In addition to compliance with appropriate construction times, the following **Standard Condition NOI-1** would implement measures during construction to reduce noise impacts to the greatest extent feasible and reduce project construction impacts to **less than significant.**

Standard Condition NOI-1 Prior to issuance of grading and building permits, the project Applicant/Developer shall submit grading plans and building plans for review and approval by the Director the City of Moreno Valley Public Works Department, or designee. These plans shall include the following requirements for construction activities:

- Construction activities shall only occur between the hours of 7:00 a.m. and 8:00 p.m. No construction shall be permitted outside of these hours or on federal holidays.
- Construction contracts shall specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturers' standards.
- In order to maximize the distance between construction equipment staging areas and the sensitive noise receivers in the area, all equipment staging areas and material storage areas shall be placed as far from these receivers as possible.
- During construction, stationary construction equipment shall be placed so that emitted noise is directed away from sensitive receptors nearest the project site.

Long-Term Noise. *Traffic Noise:* As detailed in the Trip Generation and Vehicle Miles Traveled (VMT) Analysis (Appendix J) prepared for the project, the proposed project would generate 216 daily trips. Based on the ADT counts provided by the City, the ADT along Alessandro Boulevard and Indian Street

in the vicinity of the project site is approximately 22,100 and 7,400, respectively, based on projections for the year 2005. While the existing ADT is likely higher, using 22,100 and 7,400 ADT as the existing traffic volume would be a conservative approach. As described in the Noise and Vibration Impact Analysis, the project would result in an increase of less than 0.1 dBA Community Noise Equivalent Level (CNEL) along Alessandro Boulevard and Indian Street. A noise level increase of less than 3 dBA would not be perceptible to the human ear; therefore, the traffic noise increases along Alessandro Boulevard and Indian Street resulting from the proposed project would be less than significant.

Truck Loading and Unloading Activities: Section 11.80.030(C) of the City Municipal Code states that no person shall maintain, create, operate or cause to be operated on private property any source of sound in such a manner as to create any non-impulsive sound which exceeds the City's exterior daytime and nighttime noise standard of 60 dBA L_{eq} and 55 dBA L_{eq} when measured at a distance of 200 feet or more from the real property line of the source of the sound. Noise levels generated by trucks would be similar to noise readings from truck loading and unloading activities, which generate a noise level of 75 dBA L_{eq} at 20 feet based on measurements taken by LSA. During this process, noise levels are associated with the truck engine noise, air brakes, and backup alarms. These noise levels would occur for a period of approximately 5 minutes for each truck.

Heating, Ventilation, and Air Conditioning (HVAC)Equipment: The proposed project would include rooftop HVAC units atop the proposed building. The HVAC equipment could operate 24 hours per day and would generate sound power levels (Lw) of up to 87 dBA Lw or 72 dBA L_{eq} at a distance of 5 feet. It is estimated that approximately nine HVAC units would be installed.

Operational noise level impacts would be 56.0 dBA L_{eq} during the peak hour daytime and 52.4 dBA L_{eq} during the off-peak hour nighttime at the nearest sensitive receptor (single-family residence east of project site). These noise levels are below the daytime and nighttime hourly noise level standards or 60 dBA L_{eq} and 55 dBA L_{eq}, respectively, for residential uses. Additionally, the proposed 6-foot-high wall along the eastern boundary of the project site would further reduce project-generated noise levels.

With implementation of **Standard Condition NOI-1**, short-term construction noise impacts would be reduced to less than significant. During operation, the project would not increase long-term ambient noise in excess of the City's exterior daytime and nighttime noise standards of 60 dBA L_{eq} and 55 dBA L_{eq} when measured at a distance of 200 feet or more from the real property line of the source of the sound or the equivalent noise standard when measured at the nearest sensitive receptors. Therefore, long-term noise would be **less than significant**, and mitigation is not required.

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

Response:

Less Than Significant with Mitigation Incorporated. This construction vibration impact analysis discusses the level of human annoyance using vibration levels in vibration velocity in decibels (VdB) and would assess the potential for building damage using peak particle velocity (PPV), which is measured in inches per second (in/sec). Vibration thresholds for significance are established by the City under Section 9.10.170 of the Municipal Code and by the FTA's *Transit Noise and Vibration Impact Assessment Manual*.[87]

Section 9.10.170 of the Municipal Code prohibits vibration that can be felt at or beyond the property line. However, construction activity is exempt from Section 9.10.170 pursuant to Section 9.10.030, which states temporary construction, maintenance, or demolition activities between the hours of 7:00 a.m. and 7:00 p.m. are exempt from the provisions of Chapter 9.10 (Performance Standards) of the City Municipal Code.

FTA guidelines show that a vibration level of up to 94 VdB (0.2 PPV [in/sec]) is considered safe for non-engineered timber and masonry buildings, which are the types of buildings located on properties adjacent to the project site. Table J shows the PPV and VdB values at a distance of 25 feet from the construction vibration source. As shown in Table J, large bulldozers and other heavy-tracked construction equipment (except for pile drivers and vibratory rollers) generate approximately 87 VdB of ground-borne vibration when measured at a distance of 25 feet, based on the *Transit Noise and Vibration Impact Assessment Manual*.

[87] Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual*. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed January 7, 2025).

Table J: Vibration Source Amplitudes for Construction Equipment

Equipment	Reference PPV/L_V at 25 ft	
	PPV (in/sec)	L_V (VdB)[1]
Hoe Ram	0.089	87
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018).
[1] RMS VdB re 1 µin/sec.
µin/sec = micro-inches per second
ft = foot/feet
FTA = Federal Transit Administration
in/sec = inches per second
L_V = velocity in decibels
PPV = peak particle velocity
RMS = root-mean-square
VdB = vibration velocity in decibels

The closest structures, which are associated with the self-storage uses to the north, are approximately 5 ft from the project construction boundary. With the use of smaller equipment, such as a small bulldozer with a reference level of 0.003 PPV (in/sec), the structures at 5 ft could experience vibration levels of up to 0.034 PPV (in/sec) and would not exceed the 0.2 in/sec threshold.

In the case of using larger equipment, such as a large bulldozer, the structures at 5 ft could result in vibration levels that exceed the 0.2 in/sec threshold and experience vibration levels of up to 0.995 PPV (in/sec). This vibration level exceeds the 0.2 in/sec PPV threshold, which could result in a potentially significant impact. The distance from large construction equipment with a reference vibration level of 0.089 in/sec PPV at 25 ft for which the 0.2 in/sec threshold would no longer be exceeded is 15 ft. Vibration levels at all other buildings would be lower. With implementation of **Mitigation Measure NOI-1,** which includes implementing vibration reduction measures during construction, construction would not result in any vibration damage, and impacts would be **less than significant with mitigation incorporated**.

Mitigation Measure NOI-1

Construction Vibration Assessment. Due to the close proximity to surrounding structures, the City of Moreno Valley (City) Director of Community Development, their designee, and the Developer/Applicant shall verify prior to issuance of grading permits that the approved plans require that the construction contractor shall implement the following reduction measures during project construction activities to ensure that damage does not occur at surrounding structures:

- The first step in the Vibration Assessment should be a determination if any structures are within 15 feet of potential heavy construction activities. If is determined that no structures meet this criteria, no further effort is necessary.

- If heavy construction equipment is necessary, structures that are located within 15 feet of heavy construction activities and that have the potential to be affected by ground-borne vibration should be identified. This task shall be conducted by a qualified structural engineer as approved by the City's Director of Community Development, or designee.

- Once the construction equipment list finalized, a comparison of the proposed equipment to be used and the assumed equipment vibration levels presented in Table 7-4 of the Federal Transit Administration's (FTA) *Noise and Vibration Impact Assessment Manual* (FTA Report No. 0123) shall be completed. If it is determined that the proposed equipment would generate lower vibration levels than assumed, further vibration assessment would not be necessary. However, if levels would potentially exceed the City's standard of 0.2 inch per second peak particle velocity (PPV), the project Applicant/Developer shall develop a vibration monitoring and construction contingency plan for approval by the City Director of Community Development, or designee, to identify structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific vibration limits; and address the

need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies would be identified for when vibration levels approached the limits.

- If a vibration monitoring and construction contingency plan is deemed necessary, monitoring of vibration during initial construction activities would be required. Monitoring results may indicate the need for more or less intensive measurements.
- When vibration levels approach limits, suspend construction and implement contingencies as identified in the approved vibration monitoring and construction contingency plan to either lower vibration levels or secure the affected structures.

The proposed project would not generate vibration during operation. According to the FTA's *Transit Noise and Vibration Impact Assessment Manual*, vibration levels generated from project-related traffic on the adjacent roadways are unusual for on road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Based on a reference vibration level of 0.076 in/sec PPV, structures more than 20 feet from the roadways that contain project trips would experience vibration levels below the most conservative standard of 0.12 in/sec PPV; therefore, vibration levels generated from project-related traffic on the adjacent roadways during operation would be **less than significant**, and no mitigation measures are required.

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:
No Impact. The proposed project is approximately 2.35 miles from the nearest airport (March Air Reserve Base/Inland Port Airport (MARB/IPA)). Based on the MARB/IPA Airport Land Use Compatibility Plan, the project site is located outside of the 60-dBA CNEL noise contour of the airport.[88] In addition, there are no private airstrips or heliports within 2 miles of the project site. Further, the proposed project does not include any residential use. The project would not expose people residing or working in the vicinity of the project site to excessive noise levels from aircraft noise. Therefore, **no impact** would occur related to aircraft noise. Mitigation is not required.

[88] Riverside County Airport Land Use Commission (ALUC). 2014. March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Map MA-1: Compatibility Map. Website: https://rcaluc.org/sites/g/files/aldnop421/files/2023-06/March.pdf (accessed January 7, 2025).

Sources:

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

XIV. POPULATION AND HOUSING – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	☐	☐	☒	☐

Response:
Less Than Significant Impact. The project site is located along Indian Street, north of Alessandro Boulevard. The project site is zoned as Neighborhood Commercial (NC) and would be changed to Community Commercial (CC) as part of the proposed project. Both zoning designations indicate that the project site is planned for commercial use in the City. Therefore, the City has already planned for the development of the project site.

Construction. Construction of the proposed project would provide short-term construction jobs over an approximate 12-month period. Many of the construction jobs would be temporary and would be specific to the variety of construction activities. Generally, construction workers are only at a job site for the timeframe in which their specific skills are needed to complete that phase of construction. It is expected that local and regional construction workers would be available to serve the proposed project's construction needs; therefore, project-related construction workers would not be expected to relocate their household's place of residence as a consequence of working on the proposed project. The proposed project would not result in impacts associated with inducing substantial population growth or demand for housing through increased construction employment, and no mitigation would be required.

Operation. The proposed project includes up to two employees per shift to operate the facility. The proposed project would not cause or result in direct population growth because the proposed project would not provide or remove housing on the project site. The proposed project would interconnect to existing sewer, water, electric, and telecommunications utilities within the Indian Street right-of-way. Therefore, the proposed project would not induce a substantial unplanned population growth to the area. Impacts would be **less than significant**, and no mitigation is required.

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

Response:
No Impact. The project site is vacant and does not contain any existing people or housing that would be removed due to development of the proposed project. Therefore, the proposed project would not displace

a substantial number of existing people or housing, requiring the construction of replacement housing elsewhere. **No impact** would occur, and no mitigation is required.

Sources:

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

XV. PUBLIC SERVICES – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☒	☐

Response:
Less Than Significant Impact. The City of Moreno Valley contracts with the Riverside County Fire Department (RCFD) to provide fire protection, fire prevention, and emergency services within the City. The Moreno Valley Fire Department is administered and operated by the California Department of Forestry and Fire Protection (CAL FIRE). The Kennedy Park Fire Station 65, located at 15111 Indian Street, is the closest station to the project site approximately 1.2 miles south. Fire Station 65 is a two-bay facility that houses one paramedic engine company and a reserve fire engine.[89]

Fire hazard zones published by CAL FIRE do not identify the project site as being within either a moderate, high, or very high fire hazard severity zone.[90] Although the proposed project would introduce new structures to a vacant site, the project site is located in an area that is already served by existing fire protection services. New development must comply with existing fire code pursuant to City Municipal Code and California Fire Code. The proposed project would not increase the City's number of employed firefighters or indirectly increase the City's population. Additionally, the proposed project would not increase the need for fire protection services, or adversely affect the City Fire Department's ability to provide service to the project site. Therefore, a **less than significant impact** would occur, and no mitigation is required.

ii) Police protection?	☐	☐	☒	☐

Response:
Less Than Significant Impact. The City of Moreno Valley contracts with the Riverside County Sheriff's department to provide police protection services within the City. The Moreno Valley Police Department (MVPD) headquarters is located at 22850 Calle de San Juan de Los Lagos, approximately 2 miles west of the project site. The MVPD has adopted a "Zone Policing" strategy that divides the City into four zones in which police officers are assigned. The intent of this strategy is to improve response times for calls and to connect MVPD with citizens and business owners within their assigned zones. According to the MVPD Zone Policing Map,[91] the project site is located within Zone 2. The Zone 2 team includes a Zone

[89] City of Moreno Valley. n.d. City of Moreno Valley Fire Department. Fire Station Locations. Website: https://moval.gov/departments/fire/dep-station-locations.html#tab-5 (accessed December 17, 2024).
[90] California Department of Forestry and Fire Protection (CAL FIRE). 2007. 2024. Fire Hazard Severity Zone Viewer. Website: https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/ (accessed December 18, 2024).
[91] City of Moreno Valley. n.d. City of Moreno Valley Police Department. Zone Policing. Website: https://moval.gov/departments/police/dept-zone-policing.html (accessed December 17, 2024).

Commander, Zone Supervisor, and Zone Coordinator. Although the proposed project could incrementally increase the need for police services in the area, the project site is located in an area that is within the existing service area of MVPD. Therefore, the proposed project would not require new or physically altered police protection facilities, the construction of which could cause significant environmental effects. Therefore, impacts would be **less than significant,** and no mitigation is required.

iii) Schools?	☐	☐	☐	☒

Response:
No Impact. The project site is located within the Moreno Valley Unified School District (MVUSD) boundary. MVUSD educates nearly 32,000 students in grades TK-12 at 40 schools. MVUSD consists of 23 elementary schools, 6 middle schools, 4 comprehensive high schools, and 7 alternative schools.[92] The project site is within the boundaries of Ramona Elementary School located approximately 0.28 mile northeast of the project site at 24801 Bay Avenue, Badger Springs Middle School located approximately 1.0 mile north of the project site at 24750 Delphinium Avenue, and Moreno Valley High School located approximately 1.6 miles northwest of the project site at 23300 Cottonwood Avenue.[93]

The proposed project does not include any residential uses that would increase population growth, generate an increased demand for school facilities, or require the construction of school facilities. The operation of the proposed project would not result in an increase in demand for schools and would not trigger the need for new or altered school facilities. Therefore, the project would have **no impacts** related to schools, and no mitigation would be required.

iv) Parks?	☐	☐	☒	☐

Response:
Less Than Significant Impact. The proposed project does not include any residential uses and, therefore, would not increase the City's population or result in an increased demand for parks. The new employees anticipated by the project are expected to reside generally in the vicinity of the site. As there is no direct increase in population anticipated from the project, demand on existing park facilities is expected to be minimal. Therefore, no new park facilities would be required to serve the project. Impacts would be **less than significant,** and no mitigation is required.

v) Other public facilities?	☐	☐	☒	☐

Response:
Less Than Significant Impact. The proposed project would not cause an increase in population resulting in a significant impact on other public facilities such as libraries and public works/maintenance facilities. There is one library within 1.0 mile of the project site. The Moreno Valley City Library is located approximately 1.0 mile east of the project site at 25480 Alessandro Boulevard. As described above, the proposed project would not contribute to a direct increase in population, increasing demand for public facilities such as libraries. As such, the proposed project would not result in an increase in demand for libraries and would not trigger the need for new or altered library facilities. No new facilities would be required to be constructed to accommodate the proposed project. Therefore, the project would have **less than significant impacts** related to public libraries, and no mitigation is required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Community Development Element – Section 2.5 – Schools
     - Figure 2-3 – School District Boundaries
   - Chapter 2 – Community Development Element – Section 2.6 – Library Services
   - Chapter 2 – Community Development Element – Section 2.7 – Special Districts
   - Chapter 2 – Community Development Element – Section 2.5 – Other City Facilities
   - Chapter 4 – Parks, Recreation and Open Space Element – Section 4.3 – Parks and Recreation
     - Figure 4-2 – Future Parklands Acquisition Areas
     - Figure 4-3 – Master Plan of Trails

[92] Moreno Valley Unified School District (MVUSD). n.d.-a. About Our District. Website: https://www.mvusd.net/about/aboutus (accessed December 23, 2024).

[93] Moreno Valley Unified School District (MVUSD). n.d.-b. MVUSD District Maps. School Locator Map. Website: https://www.schoolsitelocator.com/apps/morenovalley/?data_id=dataSource_1-ssl_test_mapImageService_4376%3A16 (accessed December 17, 2024).

- Chapter 6 – Safety Element – Section 6.1 – Police Protection and Crime Preventions
- Chapter 6 – Safety Element – Section 6.2 – Fire and Emergency Services
  - Figure 6-1 – Fire Stations

2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.13 – Public Services
     - Figure 5.13-1 – Location of Public Facilities
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code

XVI. RECREATION – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

Response:
Less Than Significant Impact. The proposed project does not include any residential uses and would not contribute to a direct increase in population. The new employees generated by the project are expected to reside in the general vicinity of the project site. Therefore, the project would not substantially increase demand on existing neighborhood or regional parks or other recreational facilities so as to increase or accelerate their physical deterioration. The proposed project would result in **less than significant impacts**, and no mitigation is required.

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:
No Impact. The proposed project does not include any recreational facilities or parkland. As stated above, the proposed project does not include residential uses and would not contribute to a direct increase in population. Therefore, the proposed project would not propose, or create a need for, new or physically altered recreational facilities. The project would result in **no impact** and no mitigation is required.

Sources:

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

XVII. TRANSPORTATION – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐

Response:

Less Than Significant Impact. The project would develop a self-storage facility on a currently vacant project site. Vehicular access to the project site would be provided via Indian Street and the existing shared access driveway south of the proposed self-storage building. The access driveway would lead to two access gates, one on the east side of the proposed self-storage building facilitating access to the northern portion of the project site, and the other also on the east side of the proposed self-storage building facilitating access to the eastern portion of the project site.

The project would include a zone change to change the zoning designation of the project site from Neighborhood Commercial (NC) to Community Commercial (CC). The project would be consistent with the CC zoning designation and not conflict with a plan, ordinance, or policy addressing the circulation system. Vehicular access to the project site would be provided via Indian Street and the existing shared access driveway south of the proposed self-storage building. Currently, a Class 2 bicycle lane exists along Indian Street adjacent to the project site. The project would not impede or interfere with existing or planned bicycle facilities along Indian Street. The project would be required to include parking facilities for bicycles and accommodate bicycle routes along its roadway frontage.

Pedestrian facilities in proximity to the project site include the existing sidewalk along Indian Street. The project would provide a landscaped setback from the sidewalk along its roadway frontage and would not remove any pedestrian facilities, nor would it conflict with any adopted plans or policies for new pedestrian facilities.

The City is primarily served by the Riverside Transportation Agency (RTA), which provides public bus service to Riverside County.[94] Although RTA does not operate any bus routes along the project frontage area on Indian Street, a bus stop for RTA route 11 is located on Indian Street just south of the intersection with Alessandro Boulevard [95]

The project would not preclude or otherwise adversely affect existing or proposed transit, pedestrian, or bicycle projects or policies identified by the City. Therefore, impacts from conflict with a program, plan, ordinance, or policy addressing transit, pedestrian, or bicycle facilities, would be **less than significant.**

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

Response:

Less Than Significant Impact. Section 15064.3 of the *State CEQA Guidelines* codifies that project-related transportation impacts are typically best measured by evaluating the project's vehicle miles traveled (VMT). According to the City *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment*,[96] projects generating less than 400 daily vehicle trips, exclusive of any existing daily vehicle trips generated by the site, are screened out from a VMT analysis and presumed to have a less than significant transportation impact.

As detailed in the Trip Generation and Vehicle Miles Traveled (VMT) Analysis[97] (Appendix J) prepared for the project, the trip generation of the self-storage building was determined by referencing trip generation rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11th

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94 City of Moreno Valley. 2006. City of Moreno Valley General Plan Final Program EIR. Chapter 5.2 – Traffic/Circulation. July.

95 Riverside Transportation Agency. 2024. System Map. Website: https://www.riversidetransit.com/index.php/maps-schedules (accessed December 19, 2024).

96 City of Moreno Valley. 2020. *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment.* Website: https://www.moval.org/departments/public-works/transportation/TIA-Guidelines.pdf (accessed December 16, 2024).

97 LSA Associates, Inc. 2024. *Trip Generation and Vehicle Miles Traveled Analysis for the Public Storage Moreno Valley Project*. October.

Edition (2021) for Land Use 151 (Mini-Warehouse).[98] In addition, the trip generation potential for the RV spaces was assessed by applying average trip rates derived from trip generation surveys for similar existing RV and boat storage facilities in Chino and Ontario. The trip characteristics of these facilities are comparable to the proposed project, as customers store their vehicles and boats and retrieve them for recreational purposes when needed. Table K shows the anticipated trip generation for the project.[99]

Table K: Project Trip Generation

Land Use	Size	Unit	Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates									
Mini-Warehouse[1]		tsf	1.45	0.05	0.04	0.09	0.07	0.08	0.15
RV Storage[2]		space	0.48	0.02	0.01	0.03	0.02	0.02	0.04
Project Trip Generation									
Mini-Warehouse	132.006	tsf	191	7	5	12	9	11	20
RV Storage	53	spaces	25	1	1	2	1	1	2
Total			**216**	**8**	**6**	**14**	**10**	**12**	**22**

Source: Compiled by LSA (2024).
[1] Trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 11th Edition (2021). Land Use 151.
[2] Trip rates are based on survey data for similar existing facilities in Chino and Ontario (2021). 50/50 inbound/outbound split is assumed for the peak hours.
tsf = thousand square feet

As shown in Table K, the proposed project would generate 216 daily trips, including 14 trips (8 inbound and 6 outbound) in the a.m. peak hour and 22 trips (10 inbound and 12 outbound) in the p.m. peak hour. Because the proposed project would generate less than 400 daily trips, it is exempt from an VMT analysis and presumed to have a **less than significant** transportation impact pursuant to the City's *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment*.[100] Mitigation is not required.

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:
No Impact. As stated previously, vehicular access to the project site would be provided via Indian Street and the existing shared access driveway south of the proposed self-storage building. The access driveway would lead to two access gates, one on the east side of the proposed self-storage building facilitating access to the northern portion of the project site, and the other also on the east side of the proposed self-storage building facilitating access to the eastern portion of the project site. Vehicular traffic to and from the project site would use the existing network of regional and local roadways that currently serve the area surrounding the project site. Based on the temporary nature of the construction activities and trips, and the low trip generation for daily operations, project vehicles would not create operational deficiencies or related hazards to the public roadways when accessing the project site.

The City and the Developer/Applicant, at final plan check, would ensure that all improvements associated with the project are consistent with City standards and requirements. Adherence to applicable City requirements would ensure the proposed development would not include any sharp curves or dangerous intersections. Therefore, the proposed project would result in **no impacts** related to traffic safety due to a design feature (e.g., substandard roadway and/or roadway design), and no mitigation would be required.

[98] Institute of Transportation Engineers (ITE). 2021, *Trip Generation Manual,* 11th Edition.
[99] This analysis evaluated the project trip generation associated with 132,006 square feet of self-storage uses and 53 RV spaces. The project's site plan has since been modified to include 130,764 square feet of self-storage uses and 52 RV spaces. The modifications to the project site plan were reviewed by LSA, and it was determined that they would result in negligible impacts related to trip generation. Therefore, the Trip Generation and Vehicles Miles Traveled Analysis accurately presents traffic impacts for the project.
[100] City of Moreno Valley. 2020. *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment.* Website: https://www.moval.org/departments/public-works/transportation/TIA-Guidelines.pdf (accessed December 16, 2024).

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

Response:
Less Than Significant Impact. Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/ around any required road closures. Typical City requirements include prior notification of any lane or road closures with sufficient signage before and during any closures, flag crews with radio communication when necessary to coordinate traffic flow, etc. The Applicant/Developer would be required to comply with these requirements, which would maintain emergency access and allow for evacuation if needed during construction activities. Compliance with these requirements would ensure that short-term impacts related to this issue are **less than significant**. Mitigation is not required.

Sources:

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

XVIII. TRIBAL CULTURAL RESOURCES – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:

Less Than Significant Impact with Mitigation Incorporated. Effective July 1, 2015, Assembly Bill (AB) 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal Cultural Resources, as defined in Public Resources Code (PRC) Section 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resource. Per PRC Section 21080.3.1, a tribe must submit a written request to the relevant lead agency if it wishes to be notified of proposed projects in its traditionally and culturally affiliated area. The lead agency must provide written formal notification to the tribes that have requested it within 14 days of determining that a project application is complete or of deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either (1) the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per PRC Section 21082.3(c).

In compliance with AB 52, letters were distributed to local Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project and have previously requested to be notified of future projects proposed by the City. The letters, which were sent on March 27, 2025 via certified mail, provided each tribe with an opportunity to request consultation with the City regarding the proposed project. The purpose of this effort was to provide Native American tribes with the opportunity for meaningful participation and to identify known tribal cultural resources on or near the project limits.

In compliance with AB 52, tribes had 30 days from the date of receipt of notification to request consultation on the proposed project. Information provided through the AB 52 tribal consultation process typically informs the assessment as to whether tribal cultural resources are present within the project limits and the significance of any potential impacts to such resources. As a result of the City's AB 52 notification process, representatives with the Agua Caliente, Pechanga, and Rincon tribes responded with the request to incorporate selected mitigation measures associated with Tribal Cultural Resources as part of this Draft IS/MND. These measures have been added as Regulatory Compliance Measure (RCM) CUL-1, identified in Section V, which sets forth procedures for handling inadvertent discoveries of human remains, including those determined to be Native American. Additional measures that also detail the inclusion of a Native American tribal monitor to be present during project construction activities and developing a Cultural Resources Monitoring Plan (CRMP) have been included as mitigation measures TCR-1 through TCR-9.

However, as discussed above in Section V, Cultural Resources, of this Draft IS/MND, no known cultural resources have been documented within the project limits or in the direct vicinity of the project limits based on archival research and field surveys. In addition, low potential exists for the proposed project to impact tribal cultural resources due to significant prior disturbance from past grading and development activities on the project limits and in the surrounding area. Regulatory Compliance Measure (RCM) CUL-1 and RCM CUL-2, identified in Section V, sets forth procedures for handling inadvertent discoveries of human remains, including those determined to be Native American. Therefore, with the incorporation of RCM CUL-1 and CUL-2 and MMs TCR-1 through TCR-9 impacts to tribal cultural resources would be **less than significant**.

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

Mitigation Measure TCR-2 **Native American Monitoring.** Prior to the issuance of a grading permit, the Developer shall secure agreements with the Pechanga Tribe for tribal monitoring. The Developer is also required to provide a minimum of 30 days' advance notice to the tribes of all ground-disturbing activities. The Native American Tribal Representatives shall have the authority to temporarily halt and redirect earth-moving activities in the affected area in the event that suspected archaeological and cultural resources are unearthed. The Native American Monitor(s) shall attend the pre-grading meeting with the Project Archaeologist, the City, the construction manager, and any contractors and will conduct the Tribal Perspective of the mandatory Cultural Resources Worker Sensitivity Training to those in attendance.

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

- Project description and location;
- Project grading and development scheduling;
- Roles and responsibilities of individuals on the Project;
- The pre-grading meeting and Cultural Resources Worker Sensitivity Training details;
- The protocols and stipulations that the contractor, City, Pechanga Tribe, 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; • The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items; • Contact information of relevant individuals for the Project.
Mitigation Measure TCR-4	**Cultural Resource Disposition**. In the event that Native American cultural resources are discovered during the course of ground disturbing activities (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries: • 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: o 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. o On-site reburial of the discovered items as detailed in the treatment plan required pursuant to Mitigation Measure CR 1. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed. No recordation of sacred items is permitted without the written consent of all Consulting Native American Tribal Governments as defined in CR 3. The location for the future reburial area shall be identified on a confidential exhibit on file with the City, and concurred to by the Consulting Native American Tribal Governments prior to certification of the environmental document.
Mitigation Measure TCR-5	**Potential Discovery of Archaeological and Cultural Resources**. The City shall verify that the following note is included on the Grading Plan: *"If any suspected archaeological and cultural resources are discovered during ground–disturbing activities and the Project Archaeologist or Native American Tribal Representatives are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Tribal Representatives to the site to assess the significance of the find."*
Mitigation Measure TCR-6	**Inadvertent Finds**. If potential historic or cultural resources are uncovered during excavation or construction activities at the project site that were not assessed by the archaeological report(s) and/or environmental assessment conducted prior to Project approval, 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 archeologists 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 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(s), and shall be submitted to the City for their review and approval prior to implementation of the said plan. Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources.
Mitigation Measure TCR-7	**Human Remains**. If human remains are discovered, no further disturbance shall occur in the affected area until the County Coroner has made necessary findings as to origin. If the County Coroner determines that the remains are potentially Native American, the California Native American Heritage Commission shall be notified within 24 hours of the published finding to be given a reasonable opportunity to identify the "most likely descendant". The "most likely descendant" shall then make recommendations and engage in consultations concerning the treatment of the remains (California Public Resources Code 5097.98). (GP Objective 23.3, CEQA). **No photographs are to be taken except by the coroner, with written approval by the Pechanga Tribe.**
Mitigation Measure TCR-8	**Non-Disclosure of Reburial Locations**. It is understood by all parties that, unless otherwise required by law, the site of any reburial of Native American 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).
Mitigation Measure TCR-9	**Archaeology Report - Phase III and IV.** Prior to final inspection, the developer/permit holder shall prompt the Project Archaeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the South Coastal Information Center (SCIC) at the San Diego State University (SDSU), and one (1) copy shall be submitted to the Pechanga Tribe's Cultural Resources Department.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 7 – Conservation Element – Section 7.2 – Cultural and Historical Resources
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.10 – Cultural Resources
     - Figure 5.10-1 – Locations of Listed Historic Resource Inventory Structures

- Figure 5.10-2 – Location of Prehistoric Sites
- Figure 5.10-3 – Paleontological Resource Sensitive Areas

• Appendix F – Cultural Resources Analysis, Study of Historical and Archaeological Resources for the Revised General Plan, City of Moreno Valley, Archaeological Associates, August 2003.

3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Title 7 – Cultural Preservation
5. Cultural Resources Inventory for the City of Moreno Valley, Riverside County, California, prepared by Daniel F. McCarthy, Archaeological Research Unit, University of California, Riverside, October 1987 (*This document cannot be provided to the public due to the inclusion of confidential information pursuant to Government Code Section 6254.10.*)

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:

Less Than Significant Impact. The proposed project would interconnect to existing sewer, water, electric, and telecommunication utilities within the Indian Street right-of-way. All proposed improvements and interconnection to existing utilities would be installed simultaneously with other construction activities.

Water. The City is served by two water purveyors: Eastern Municipal Water District (EMWD) and the Box Springs Mutual Water Company.[101] However, EMWD supplies water to the majority of the City, including the project site. EMWD has a diverse portfolio of water supplies, including imported water from the Metropolitan Water District of Southern California (MWD), local groundwater, desalinated groundwater, and recycled water.[102] The EMWD's main source of water supply is imported water from the MWD. According to the 2020 Urban Water Management Plan, most of the EMWD's water is imported water from the MWD, which is expected to meet the demands of all member agencies through 2045.[103] The MWD determined that its water resources will continue to provide a reliable supply to its member agencies from 2020 to 2045 during normal, single-dry, and multiple-dry years.[104] Therefore, development in the City is adequately served by existing EMWD infrastructure, and the proposed project would not require or result in the construction of new water facilities, or the expansion of existing facilities, which could cause a significant environmental impact, and the impact would be **less than significant**. No mitigation is required.

Wastewater. Wastewater services in the City are provided by the EMWD and the Edgemont Community Services District. EMWD provides service to most of the City, to approximately 268,000 customers and treats approximately 49 million gallons per day at its four active regional water reclamation facilities. These reclamation plants include the San Jacinto Regional Water Reclamation Facility, the Moreno Valley Regional Water Reclamation Facility, the Perris Valley Regional Water Reclamation Facility, the Sun City Regional Water Reclamation Facility, and the Temecula Valley Regional Water Reclamation Facility. Generated wastewater from the project site would be treated at the Moreno Valley Regional Water Reclamation Facility (MVRWRF). Typical daily flows at the MVRWRF are 11.5 million gallons per day, with a current capacity of 16 million gallons per day, and an ultimate capacity of 18 million gallons per day.[105] The proposed project's incremental contribution to water and wastewater treatment demand

[101] City of Moreno Valley. 2006. Moreno Valley General Plan Final Program EIR. Section 5.13 Public Services and Utilities. July.
[102] Eastern Municipal Water District (EMWD). 2021a. 2020 Urban Water Management Plan. Page 3-3. Website: https://www.emwd.org/what-we-do/water-supply/urban-water-management-plan (accessed December 30, 2024).
[103] Ibid. Section 6 Water Supply Characterization. 6.2.1 Purchased or Imported Water.
[104] Ibid. Page 7-2.
[105] Eastern Municipal Water District (EMWD). 2021b. Wastewater Service. Moreno Valley Regional Water Reclamation Facility.

would not in and of itself exceed the existing or planned capacity of the MVRWRF or require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Impacts would **be less than significant,** and no mitigation is required.

Stormwater Drainage. Regional flood control planning and facilities are under the jurisdiction of the Riverside County Flood Control and Water Conservation District (RCFCWCD).[106] The RCFCWCD has prepared three Master Drainage Plans for three portions of the City: Sunnymead area, West End, and Moreno.[107] Most of the City drains into the San Jacinto River; however, the northwest portion of the City drains to the west into a tributary of the Santa Ana River.[108] The Sunnymead Storm drain, the Kitching Storm drain, and the Perris Valley Storm drain are the three major storm drains that serve the City. The proposed project is located within the Sunnymead Master Drainage Plan area. Development of the proposed project (buildings and pavement) would alter the amount of existing impervious surface area and the amount of generated runoff.

The proposed project would result in an increase in impervious surface area on site. However, as discussed in Section X, Hydrology and Water Quality, the proposed project would comply with the Construction General Permit, which regulates stormwater discharges from construction sites which result in disturbance of at least 1 acre of soil, and the Riverside County MS4 Permit, which regulates urban stormwater runoff, surface runoff, and drainage that flow into the MS4 system. Additionally, the project would comply with City Municipal Code Section 8.21.160, Erosion Control Plan, and City Municipal Code Section 8.10, Stormwater/Urban Runoff Management and Discharge Controls. The project would be required to prepare a SWPPP, Final WQMP, and Erosion Control Plan in compliance with the Construction General Permit, Riverside County MS4, and City Municipal Code, would reduce any impacts to stormwater and drainage facilities to less than significant. No mitigation is required.

Electric Power. Southern California Edison (SCE) and Moreno Valley Electric Utility (MVU) provide electrical power to the City. The project site is within the service area of MVU.[109] According to the MVU, the total amount of electricity sales in Fiscal Year 2019/2020 was 201,765,902 kilowatt-hours (kWh), or 201.765902 gigawatt-hours (GWh).[110] According to the California Energy Commission (CEC), total electricity consumption for Riverside County in 2019 was 15,763 GWh.[111]

Short-term construction activities would be limited to providing power to the staging area and portable construction equipment and would not substantially increase demand for electricity. Given the limited nature of potential demand for electricity during construction and the availability of existing power lines near the project site, there would not be a need to construct new or alter existing electric transmission facilities. Impacts to local regional supplies of electricity would be **less than significant**, and no mitigation is required.

The project site is currently undeveloped. The proposed project would interconnect to existing electricity infrastructure. Operation of the proposed project would increase on-site electricity demand. California Emissions Estimator Model (CalEEMod) Version 2022.1 was used to calculate the approximate annual electricity demand of the proposed project. The proposed project would be required to adhere to all federal, State, and local requirements for energy efficiency, which would substantially reduce energy usage. As shown in Section VI, Energy, the estimated increase in electricity demand associated with the operation of the proposed project would be 629,861 kWh per year. Total electricity consumption in Riverside County in 2022 was 17,780,573,271 kWh;[112] therefore, operation of the proposed project would negligibly increase the annual electricity consumption in Riverside County by approximately 0.00004 percent. Electricity service providers use projected demand forecasts in order to provide an adequate supply or plan for surplus in their service areas. Because the proposed project would only represent a small fraction of electricity demand in Riverside County, would meet Title 24 requirements, and sufficient

Website: https://www.emwd.org/what-we-do/wastewater-service (accessed December 18, 2024).

106 City of Moreno Valley. 2006. Moreno Valley General Plan Final Program EIR. Section 5.13 Public Services and Utilities. July.

107 City of Moreno Valley. 2006. Moreno Valley General Plan Final Program EIR. Section 5.7 Hydrology/Water Quality. July.

108 Ibid.

109 City of Moreno Valley. 2021. Moreno Valley Public Works Department. MVU Service Area Map. Website: https://moval.gov/mvu/index.html (accessed December 27, 2024).

110 City of Moreno Valley Public Works Department. 2020. Moreno Valley Electric Utility Annual Report 2019-2020. Website: https://moval.gov/mvu/pubs/MVU-2020-AnnualReport/index.html (accessed December 27, 2024).

111 California Energy Commission (CEC). 2019. Electricity Consumption by County. Website: https://ecdms.energy.ca.gov/elecbycounty.aspx (accessed December 27, 2024).

112 California Energy Commission (CEC). 2022. Electricity Consumption by County. Website: http://www.ecdms.energy.ca.gov/ (accessed January 2025).

electricity supplies would be available; energy demands for the proposed project would be **less than significant**. No mitigation would be required.

Natural Gas. Natural gas is provided to the City by the Southern California Gas Company (SoCal Gas).[113] The proposed project would not use natural gas for construction or operation. Therefore, construction activities would not impact natural gas services, and the proposed project would not require new or physically altered gas transmission facilities. The project would not require or result in the relocation or construction of new or expanded gas facilities, the construction of which could cause significant environmental effects. There would be **no impact**, and no mitigation would be required.

Telecommunications Facilities. Cable, internet, and telephone services are provided to the City's residents by major third-party purveyors. Cellular services provided by all major cellular networks are available in the City. Construction activities associated with the proposed project would not increase the demand for telecommunications facilities. Telecommunication infrastructure would be extended to the proposed project; however, no off-site telecommunication infrastructure would be required. Therefore, implementation of the proposed project would result in **no impact** related to the construction or relocation of existing telecommunications facilities, and no mitigation would be required.

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

Response:
Less Than Significant Impact. As discussed in Response XIX(a), implementation of the proposed project would not substantially increase the demand for water supplies on the project site. Short-term demand for water may occur during construction activities on site. Water from existing potable water lines in the vicinity of the project site would be used. Overall, short-term construction activities would require minimal water and are not expected to have any adverse impacts on the existing water system or available water supplies. The proposed project would not require the construction of new or expanded water conveyance, treatment, or collection facilities with respect to construction activities.

Water demand associated with the operation of the proposed project would be similar to other developments in the area that are a similar use. The project-generated increase in water demand would be negligible and would fall within the City's existing capacity and available supply. As such, the proposed project would not necessitate new or expanded water entitlements, and the City would be able to accommodate the increased demand for potable water.

The project would be served by EMWD through interconnection to existing water utilities. The proposed project would not require or result in the construction of new or expanded water entitlements, and the City would be able to accommodate the incrementally increased demand for potable water. Therefore, water demand from the proposed project would have sufficient water supplies available to serve the project from existing entitlements and resources and would not require new or expanded entitlements. Therefore, impacts related to water supplies would be **less than significant**, and no mitigation would be required.

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:
Less Than Significant Impact. As discussed in Response XIX(a), implementation of the proposed project would not result in a substantial increase in demand for wastewater services on the project site. Impacts related to wastewater are considered **less than significant**, and mitigation is not required.

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:

[113] City of Moreno Valley. 2006. Moreno Valley General Plan Final Program EIR. Section 5.13 Public Services and Utilities. July.

Less Than Significant Impact. The City provides trash, recycling, and special waste handling services to residents and businesses through a contract with Waste Management. Solid waste generated within the proposed project would be disposed of at the Riverside County Waste Management Department's Badlands Sanitary Landfill located at 31125 Ironwood Avenue approximately 6 miles northeast of the project site. The Badlands Sanitary Landfill has a maximum daily permitted throughput of 5,000 tons per day, remaining capacity of 7,800,000 cubic yards, and an anticipated closure date of 2059.[114] The proposed project would generate approximately 124 tons of solid waste per year, or 0.34 tons per day, which is 0.00007 percent of the current daily permitted throughput at the Badlands Sanitary Landfill. Therefore, the Badlands Sanitary Landfill would have adequate capacity to serve the proposed project. Additionally, the project proposes a self-storage use that would not generate volumes or types of waste not already considered under the City's General Plan and zoning for the project site, and as addressed under existing policies and regulations. Impacts to solid waste disposal would be **less than significant**, and mitigation is not required.

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

Response:

No Impact. The proposed project would be required to comply with applicable statutes and regulations, including waste diversion programs mandated by City, State, or federal law. California Department of Resources Recycling and Recovery (CalRecycle) regulations require that construction contractors recycle/reuse at least 65 percent of construction materials, and use "Green Building Materials" for at least 10 percent of the project.[115] City Municipal Code Section 8.80.040 (On-Site practices) establishes protocols that construction contractors must follow to ensure construction materials are properly diverted from the waste stream and quantified. Pursuant to Assembly Bill 341, all commercial accounts with the City's solid waste provider must implement a recycling program if it would generate at least 4 cubic yards of solid waste per week. Compliance with regulations related to solid waste disposal and diversion is required for all projects within the City. Therefore, the project would not conflict with statutes and regulations related to solid waste. **No impact** related to this issue would occur, and no mitigation is required.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
   - Chapter 2 – Conservation Element – Section 2.4 – Utilities
   - Chapter 6 – Safety Element – Section 6.7 – Water Quality
   - Chapter 7 – Conservation Element – Section 7.3 – Solid Waste
   - Chapter 7 -- Conservation Element – Section 7.5—Water Resources
     - Figure 7-1 – Water Purveyor Service Area Map
2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
   - Section 5.7 – Hydrology and Water Quality
     - Figure 5.7-1 – Strom Water Flows and Major Drainage Facilities
     - Figure 5.7-2 – Groundwater Basins
   - Section 5.13 – Public Services
     - Figure 5.13-1 – Locations of Public Facilities
3. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code
4. Moreno Valley Municipal Code Chapter 8.10 Stormwater/Urban Runoff Management and Discharge Controls
5. Moreno Valley Municipal Code Section 8.21.170 National Pollutant Discharge Elimination System (*NPDES*).
6. Moreno Valley Municipal Code Chapter 8.80 – Recycling and Diversion of Construction and Demolition Waste

[114] California Department of Resources Recycling and Recovery (CalRecycle). n.d.-a. Facility/Site Summary Details: Badlands Sanitary Landfill. Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367 (accessed December 19, 2024).

[115] California Department of Resources Recycling and Recovery (CalRecycle). n.d.-b. Construction and Landscaping. Overview of Requirements. SB 1383 & CALGreen. Website: https://calrecycle.ca.gov/organics/slcp/jurisdictions/calgreenmwelo/#:~:text=Construction%20Waste%20Diversion&text=The%20SB%201383%20regulations%20require,building%20projects%20in%20the%20state (accessed December 19, 2024).

XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, **would the project:**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Response:
Less Than Significant Impact. The project site is not located within any State Responsibility Area (SRA) for fire service and is not within or near a Very High Fire Hazard Severity Zone (VHFHSZ).[116] In addition, as noted in Checklist Response IX(f), the proposed project would not impair an adopted emergency response plan or emergency evacuation plan.

During temporary construction activities, all construction equipment and parking would be staged within the project site. Although, it is possible there would be temporary lane closures along Indian Street during project construction, the proposed project would not permanently obstruct any transportation routes that could be used as evacuation routes during emergency events. Adequate emergency access would be provided to and from the project site. Additionally, emergency access would be subject to review by the Moreno Valley Fire Department and Police Department for compliance with fire and emergency access requirements. Therefore, potential impacts related to emergency response and evacuation plans during operation would be **less than significant**. No mitigation is required.

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?	☐	☐	☐	☒

Response:
No Impact. As discussed in Checklist Response XX(a), the project site is not within or near a VHFHSZ.[117] Additionally, the project site is generally flat and is bound by existing developments in an urban area. Therefore, the proposed project would not exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. **No impact** would occur, and no mitigation is required.

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

Response:
No Impact. The proposed project is not located in or near a VHFHSZ within an SRA or LRA.[118] The proposed project is surrounded by urban uses and would not require the installation or maintenance of associated infrastructure**. No impact** would occur, and no mitigation is required.

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

Response:
No Impact. The proposed project is not located in or near a VHFHSZ within an SRA or LRA.[119] The topography of the project site and surrounding area is relatively flat. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding

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[116] California Department of Forestry and Fire Protection (CAL FIRE). 2024. Fire Hazard Severity Zone Viewer. Website: https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/ (accessed December 18, 2024).
[117] Ibid.
[118] California Department of Forestry and Fire Protection (CAL FIRE). 2024. Fire Hazard Severity Zone Viewer. Website: https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/ (accessed December 18, 2024).
[119] Ibid.

or landslides, as a result of runoff, post-fire slope instability, or drainage changes. **No impact** would occur, and no mitigation is required.

Sources:

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

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

Response:

Less Than Significant with Mitigation Incorporated. The project site was previously used for agriculture from 1938 to 1997 and has been historically plowed or disked for weed abatement compliance. Currently, the project site is vacant and contains ruderal vegetation.

Compliance with the NPDES and Riverside County MS4 Permit ensures the State's mandatory standards for the maintenance of clean water and the federal minimums are met. Compliance with the provisions of the NPDES permit and implementation of the LID BMPs specified in the WQMP are regulatory requirements that apply to all development projects. These requirements were previously detailed in Section X, Hydrology and Water Quality. A Final WQMP and SWPPP will be approved as a routine action during the processing of the project by the City; therefore, the required measures and features detailed in the WQMP and SWPPP to safeguard water quality would be incorporated into the project. Additionally, the project would comply with City Municipal Code Section 8.21.160, Erosion Control Plan, and City Municipal Code Section 8.10, Stormwater/Urban Runoff Management and Discharge Controls, in order to control runoff and erosion and incorporate BMPs to capture, treat, and reduce pollutants of concern in stormwater runoff. Compliance with the requirements included in the NPDES permit, Riverside County MS4 Permit, and City Municipal Code would ensure impacts to water quality remain **less than significant**.

No riparian or sensitive natural community is located on site, and there is no designated critical habitat within or adjacent to the project site for any species (Appendix C). The project site does not include any federally protected wetlands or any drainage features, ponded areas, wetlands, or riparian habitat subject to jurisdiction by the CDFW, USACE, and/or RWQCB. The Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis and Biology Report (Appendix C) included a literature search and pedestrian survey of the site and indicates the site does not contain suitable habitat for any threatened or endangered species. Additionally, no species identified in MSHCP Table 9-3 have more than a low potential of being present on the project site due to disturbance. The project site is located within the Stephens' Kangaroo Rat Habitat Conservation Plan area, and a fee payment will be required prior to issuance of a grading permit. The project will comply with the Habitat Conservation Plan for the Stephens' Kangaroo Rat in Western Riverside County (Riverside County Habitat Conservation Agency, February 1995) and fulfill its compensatory mitigation requirements under this plan through the payment of a fee.[120].

Trees, shrubs, and other vegetation on the project site provide suitable nesting habitat for common bird species, so the project would be required to implement **Mitigation Measure BIO-1** to ensure a qualified biologist conducts a pre-construction survey for nesting birds if construction activities occur during nesting bird season. During the biological survey of the project site, several ornamental trees were found on site. The ornamental trees will be managed in accordance with Part E and Part G of 9.17.030 (Landscape and Irrigation Design Standards) of the City Municipal Code. Prior to the issuance of grading permits, the project Applicant/Developer must submit detailed grading plans prepared in conformance with applicable standards of the City's Landscape and Irrigation Design Standards. The City, at final plan check, would ensure that all improvements associated with the project are consistent with these City standards and requirements. Compliance with these standards is required of all projects in the City as a matter of regulatory policy (i.e., City Municipal Code) and therefore would not constitute mitigation in order to remove the trees. With implementation of **Mitigation Measure BIO-1**, impacts to native resident or migratory fish or wildlife species, established native resident or migratory wildlife corridors, and native wildlife nursery sites would be reduced to **less than significant with mitigation incorporated**.

The project-specific Cultural Resources Assessment (Appendix D) identified two historic period resources (33-028200, a canal; and 33-28824, a minimal archaeological site) and a Native American Traditional Cultural Property (TCP) (33-029890, Pechanga Sycamore Hills TCP) are within 1 mile of the project site. No cultural resources were previously documented within or near the project site, no cultural resources were identified during the survey, and the project site has sustained severe disturbance. Additionally, no archeological resources were identified. However, construction of the project would include excavation to depths of at least 5 feet below the proposed grade or 3 feet below bottom of foundations and floor slab, whichever is deeper. In the unlikely event that any previously unidentified archaeological resources are discovered during ground-disturbing activities, work in the area would be required to cease, and deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2 as specified in **Standard Condition CUL-1**. Additionally, due to the project's proximity to a TCP, the project would implement **Mitigation Measure CUL-1** and **Mitigation Measure CUL-2,** which require implementation of a Worker's Environmental Awareness Program (WEAP) training and archeological monitoring during construction. Further, in the unlikely event that any previously unidentified human remains are discovered during ground-disturbing activities, the project would implement the requirements as specified in **Standard Condition CUL-2** to protect human remains. With implementation of mitigation, impacts related to historical and archaeological resources would be **less than significant with mitigation incorporated**.

As a result of the City's AB 52 notification process, representatives with the Agua Caliente, Pechanga, and Rincon tribes responded with the request to incorporate selected mitigation measures associated with Tribal Cultural Resources as part of this Draft IS/MND. Regulatory Compliance Measure (RCM) CUL-1 and RCM CUL-2, identified in Section V, which sets forth procedures for handling inadvertent discoveries of human remains, including those determined to be Native American. Additional measures that also detail the inclusion of a Native American tribal monitor to be present during project construction activities and developing a Cultural Resources Monitoring Plan (CRMP) have been included as mitigation measures TCR-1 through TCR-9 based on the input provided by the Pechanga Tribe. Therefore, with the incorporation of RCM CUL-1 and CUL-2 and MMs TCR-1 through TCR-9, impacts to tribal cultural resources would be less than significant.

As discussed in Checklist Response III(c), the proposed project would exceed SCAQMD cancer risk thresholds during construction and would result in a potentially significant impact on sensitive receptors. However, the proposed project would implement **Mitigation Measure AIR-1**, which requires the use of cleaner construction equipment to reduce substantial pollutant concentrations during construction. With

implementation of **Mitigation Measure AIR-1**, the proposed project would have a less than significant impact related to substantial pollutant concentrations. Accordingly, impacts would be reduced to **less than significant with mitigation incorporated.**

The proposed project has either no impact, a less than significant impact, or a less than significant impact with implementation of mitigation with respect to all natural resources issues pursuant to CEQA. Due to the limited scope of physical impacts to the environment associated with the proposed project, implementation of the Standard Conditions and Mitigation Measures described above would ensure impacts to the quality of the environment would be reduced to **less than significant with mitigation incorporated.**

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

Response:

Less Than Significant with Mitigation Incorporated. In evaluating the cumulative effects of the project, Section 21100(e) of the *State CEQA Guidelines* states that "previously approved land use documents including, but not limited to, general plans, specific plans, and local coastal plans, may be used in cumulative impact analysis." The proposed project includes up to two employees per shift to operate the facility.[121] The proposed project would be consistent with the current land use designation in the City's General Plan and would not substantially alter the housing and employment forecast in the City.

As discussed in Checklist Response III(b), construction and operation of the project would not generate criteria pollutants in excess of South Coast Air Quality Management District (SCAQMD) emissions thresholds. Therefore, the project would not contribute significantly to cumulative impacts for any air quality pollutants for which the region is in nonattainment. As for cumulative impacts to regional air quality, the discussion in Checklist Response III(a) indicates the proposed project would neither conflict with the SCAQMD's Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The SCAQMD uses the project-level significance thresholds to determine whether a project's emissions are cumulatively considerable. Because the project's emissions do not exceed the SCAQMD's regional significance thresholds, as detailed in Checklist Response III(b), the SCAQMD does not consider the project to contribute significantly to a cumulative air quality impact.

Because the proposed project would generate less than 400 daily trips, it is exempt from a vehicle miles traveled (VMT) analysis and presumed to have a **less than significant** transportation impact pursuant to the City's *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment*.[122]

As detailed in Checklist Response XIII(a), the project-related traffic noise increase on adjacent roadways would be less than 0.1 A-weighted decibels (dBA). Noise level increases less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, traffic noise impacts from cumulative project-related traffic on off-site sensitive receptors would be **less than significant**. The closest structures to the project site, which are associated with the storage uses to the north are approximately 5 feet from the project construction boundary and would experience vibration levels of up to 0.995 PPV (in/sec). This vibration level would exceed the 0.2 in/sec PPV threshold, which would result in a potentially significant impact. With implementation of **Mitigation Measure NOI-1**, which includes implementing vibration reduction measures during construction, construction would not result in any vibration damage, and impacts would be **less than significant with mitigation incorporated**.

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[120] Riverside County Habitat Conservation Agency (RCHCA). 1995. Stephens' Kangaroo Rat Mitigation Fee. Website: https://www.rchca.us/185/Stephens-Kangaroo-Rat-Mitigation-Fee (accessed December 2024).

[121] Assumes up to two shifts per day.

[122] City of Moreno Valley. 2020. *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment*. Website: https://www.moval.org/departments/public-works/transportation/TIA-Guidelines.pdf (accessed December 16, 2024).

The project has no impact, a less than significant impact, or a less than significant impact with implementation of mitigation with respect to all environmental issues. Therefore, a **less than significant cumulative impact with mitigation incorporated** would occur**.**

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

Response:

Less Than Significant with Mitigation Incorporated. All development associated with the project must comply with applicable provisions of the California Building Code (CBC) and the City's building regulations. Accordingly, proper engineering design and construction in conformance with the CBC standards and project-specific geotechnical recommendations would ensure that the project does not subject people to significant geologic hazards.

The transport, use, and storage of hazardous materials during the construction and operation of the site would be conducted pursuant to all applicable local, State and federal laws, and in cooperation with the Riverside County Fire Department, the Riverside County Department of Environmental Health, Hazardous Materials Division, the Environmental Protection and Oversight Division, and the California Occupational Safety and Health Administration. Through compliance with all applicable federal, State, and local laws, impacts to the public or environment from hazardous materials would be **less than significant.**

The project is required to comply with SCAQMD Rule 402, which states: "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." SCAQMD published its Final Localized Significance Threshold Methodology in June 2003 and updated it in July 2008, recommending that all air quality analyses include an assessment of both construction and operational impacts on the air quality of nearby sensitive receptors. Localized significance thresholds (LSTs) represent the maximum emissions from a project site of up to 5 acres that are not expected to result in an exceedance of the National Ambient Air Quality Standards or California Ambient Air Quality Standards for CO, NO_2, PM_{10} and $PM_{2.5}$. LSTs are based on the ambient concentrations of that pollutant within the project Source Receptor Area (SRA) and the distance to the nearest sensitive receptor. For this project, the appropriate SRA is the Moreno Valley Area (SRA 24) according to the project air quality analysis included in Appendix A. As detailed in Tables C and D, construction and operation of the proposed project would not expose nearby sensitive receptors to substantial pollutant concentrations. However, as detailed in the HRA prepared for the project (Appendix B), the project would exceed the SCAQMD cancer risk threshold for the residential MEI. Therefore, the project would implement **Mitigation Measure AIR-1**, which requires the use of cleaner construction equipment to reduce substantial pollutant concentrations during construction. Implementation of **Mitigation Measure AIR-1** would ensure impacts would be below thresholds. Accordingly, impacts would be reduced to **less than significant with mitigation incorporated.**

As detailed in Checklist Responses XIII(a) and XIII(b), construction and operation of the project would not generate a substantial temporary or permanent increase in ambient noise levels or generate vibration in the vicinity of the project in excess of standards established in the local general plan or noise ordinance with implementation of **Mitigation Measure NOI-1**.

Through compliance with existing regulations and policy, as well as **Mitigation Measure NOI-1** and **Mitigation Measure AIR-1,** substantial direct or indirect effects on human beings would be reduced to **less than significant with mitigation incorporated.**

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Appendix A:

Air Quality, Energy, and Greenhouse Gas

Technical Memorandum

Appendix B:

Health Risk Assessment

Appendix C:

Western Riverside County Multiple Species Habitat Conservation Plan

Consistency Analysis and Biology Report

Appendix D:

Cultural Resources Assessment

Appendix E:

Geotechnical Engineering Exploration and Analysis

Appendix F:

Phase I Environmental Site Assessment

Appendix G:

Project Specific Water Quality Management Plan

Appendix H:

Preliminary Hydrology Study

Appendix I:

Noise and Vibration Impact Analysis

Appendix J:

Trip Generation and Vehicle Miles Traveled Analysis