

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) FOR COTTONWOOD APARTMENTS



**GENERAL PLAN AMENDMENT (PEN24-0133), CHANGE OF ZONE (PEN24-0134)
AND
PLOT PLAN (PEN24-0075)**

May 2026

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

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APPENDICES (Separate Documents)

- Appendix A** *Air Quality/Greenhouse Gas Study for Cottonwood Apartments, prepared by Elevated Entitlements, February 2026*
- Appendix B1** *Elevated Entitlements Biological Resources Assessment Addendum, May 30, 2024*
- Appendix B2** *Cottonwood Village Development Project: Biological Resources Assessment, Jurisdictional Delineation Report, and MSHCP Consistency Analysis, prepared by Jacobs Engineering Group, Inc., June 2021*
- Appendix C1** *Cultural Resources Assessment Update, prepared by BioCultural LLC August 2025*
- Appendix C2** *Cultural Resources Survey Report, prepared by CRM Tech September 2021*
- Appendix D** *Energy Letter Report, prepared by MD Acoustic February 2025*
- Appendix E** *Geotechnical Engineering Report, prepared by GeoSoils Consultants Inc., April 2024*
- Appendix F1** *Preliminary Hydrology Study, prepared by Blue Engineering and Consulting, Inc., December 2024*
- Appendix F2** *Project Specific Water Quality Management Plan, prepared by Blue Engineering and Consulting Inc., January 2025*
- Appendix G** *Phase 1 Environmental Site Assessment (ESA), prepared by GeoTek, Inc., May 20, 2025*
- Appendix H** *Noise Analysis for Cottonwood Apartments, Moreno Valley, CA prepared by Elevated Entitlements, February 2026*
- Appendix I** *Project Scoping Form for Cottonwood Apartments, prepared by Kimely-Horn, 2024*
- Appendix J** *Project Plans, 2025*
- Appendix K** *Cottonwood Apartments Mitigation Monitoring and Reporting Program, 2026*
- Appendix L** *Yuhaaviatam of San Manuel Nation AB 52 Consultation Letter, July 7, 2025*
- Appendix M** *Morongo Band of Mission Indians AB 52/SB 18 Consultation Letter, August 8, 2025*



INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND) FOR COTTONWOOD APARTMENTS

BACKGROUND INFORMATION AND PROJECT DESCRIPTION:

1. **Project Case Number(s):** PEN 24-0133, PEN 24-0134, and PEN 24-0075
2. **Project Title:** Cottonwood Apartments
3. **Public Comment Period:** To be added.
4. **Lead Agency:** City of Moreno Valley
Julia Descoteaux, Planning Department
14177 Frederick Street
Moreno Valley, CA 92552
(951) 413-3206
E-mail: planningnotices@moval.org
5. **Documents Posted At:** <https://moval.gov/cdd/documents/about-projects.html>
6. **Prepared By:** Sydney Marschalk, Project Manager
Elevated Entitlements LLC
Westlake Village, CA 91362
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Sydney@elvted.com
7. **Project Sponsor:**
Applicant
Kevin Kohan, Principal Planner
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5716 Corsa Ave Suite 201, Westlake Village, CA 91362
Kevin@elvted.com

Property Owner
RSI Development Moreno Valley LLC
620 Newport Center Drive, Newport Beach, CA 92660
8. **Project Location:** Northerly of Cottonwood Avenue, approximately 575 feet easterly of the intersection of Perris Boulevard and Cottonwood Avenue, in the City of Moreno Valley, County of Riverside, California. United States Geographic Survey! (USGS) 7.5-minute Sunnymead Quadrangle, California in Township 3 South, Range! 3 West, Section 8. Assessor's Parcel Number 479-140-022

9. **General Plan Designation:** R10 Residential

According to the General Plan, areas designated as R10 Residential are intended to accommodate a variety of residential products, with a maximum allowable density of 10 dwelling units per acre. The proposed project proposes a General Plan Amendment to reclassify the area from R10 Residential to R20 Residential, which permits a higher density of 20 dwelling units per acre. This amendment would significantly increase the potential for housing in the community.

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

No specific plan is applicable to the project site.

11. **Existing Zoning:** Residential 10 District (R10)

The primary purpose of the Residential 10 (R10) zoning district is to provide for a variety of residential housing types and to encourage innovation design that includes enhanced amenities such as common open space and recreation areas. This district is intended to support the development of attached residential dwelling units, as well as mobile home parks, with a minimum density of 8 dwelling units per net acre and a maximum allowable density of 10 dwelling units per net acre, as specified in Table 9.03.040-8 of the Moreno Valley Municipal Code (MVMC). The proposed project includes a Change of Zone from R10 to R20 in order to significantly increase the housing potential within the community.

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

Location	Existing Land Use	Zoning District	General Plan
Project Site	Vacant	Residential 10 District (R10)	R10 Residential
North	Single-Family Residential	Residential 5 District (R5)	R5 Residential
South	Church, Single-Family Residential, and Storage Yard	Residential 5 District (R5)	R5 Residential
East	Single-Family Residential	Residential 5 District (R5)	R5 Residential
West	Single-Family Residential	Residential 5 District (R5)	R5 Residential

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

Environmental Setting

Existing Project Site

The Cottonwood Apartments are proposed for development on a 9.4-acre parcel located at APN: 479-140-022, off Cottonwood Avenue in the City of Moreno Valley, California. The site is zoned R10, as designated by the City of Moreno Valley Development Code, allowing for residential development. The project site is characterized by minimal native vegetation, and does not contain any known animal habitats, historical features or defined watercourses.

Topographically, the site is relatively flat, with an approximate elevation differential of six feet across the property. Surface drainage generally flows southward. Elevation

on the site ranges from approximately 1,588 to 1,593 feet above mean sea level (AMSL).

Geologically, the project site is located within the Peninsular Ranges geomorphic province, one of the largest geomorphic units in western North America. This province extends approximately 975 miles, from its northern boundary near the Transverse Ranges to the southern tip of Baja California. It varies in width from about 30 to 100 miles and is bounded by the Pacific Ocean to the west, the Gulf of California to the south, and the Colorado Desert Province to the east. The Peninsular Ranges consist primarily of northwest-southeast trending fault blocks. Prominent fault zones in this region include the Elsinore and San Jacinto Fault Zones, both located near the center of the province, and the San Andreas Fault Zone, which defines its northeastern boundary.

The project site consists of a previously cleared and graded vacant lot, surrounded by urban landscape, consisting of residential development to the north, west, and east, and commercial development to the south. Existing disturbances on the site include periodic disking, illegal dumping, and litter accumulation. The site is completely disturbed and no longer supports native habitat.

Vegetation on-site is sparse and dominated by non-native, invasive species such as field bindweed (*Convolvulus arvensis*) and several species of non-native grasses, including slim oat (*Avena barbata*), brome grasses (*Bromus* spp.), Bermuda grass (*Cynodon dactylon*), Italian rye grass (*Festuca perennis*), and foxtail barley (*Hordeum murinu*). A reconnaissance-level survey identified only a limited number of common bird species, including the American kestrel (*Falco sparverius*), House sparrow (*Passer domesticus*), Cassin's kingbird (*Tyrannus vociferans*), and Mourning dove (*Zenaida macroura*).

Project Description

Introduction

The project site is primarily surrounded by one- and two-story single-family residential homes to the north and east. To the west, the site is bordered by additional single-family homes, a gas station, and a shopping center across Perris Boulevard. To the south, across Cottonwood Avenue, lies St. Christopher Parish Catholic church, a single-family home, and a storage yard with a gas station.

The proposed project involves the development of a 9.39-acre vacant parcel located north of Cottonwood Avenue, approximately 575 feet east of the intersection of Perris Boulevard and Cottonwood Avenue, in the City of Moreno Valley. *Figure 1, Regional Location Map*, illustrates the regional context of the project, while *Figure 2, Project Vicinity Map*, identifies the site location.

The development will consist of 23 two-story buildings, each containing eight apartment units, for a total of 184 residential units. The unit mix will include 80 one-bedroom units and 104 two-bedroom units, offering a range of housing options for future residents.

Project amenities will include a central recreation featuring a BBQ area, swimming pool and spa, children's play area, indoor gym, and restrooms facilities. A total of 334 parking spaces will be provided to adequately serve the residential community. This will

include total of 198 covered parking spaces and 136 uncovered parking spaces. *Figure 3, Conceptual Site Plan*, illustrates the proposed site layout.

Land Use and Zoning Designations

The project site is currently designated as Residential 10 (R10) under the 2006 General Plan and is zoned Residential 10 in accordance with the City of Moreno Valley Municipal Code (MVMC). The proposed project includes a request for a General Plan Amendment (PEN24-0133) to change the land use designation from Multifamily Residential (R10) to Multifamily Residential (R20). The Residential 10 designation is intended to support a variety of residential product types and promote innovative housing solutions with enhanced amenities such as common open space and recreational areas.

In addition, the project proposes a Change of Zone (PEN24-0134) to rezone the site from R10 to R20. The R20 zoning district is designed to accommodate a broader range of housing types in a more urban setting than typically found in other parts of the city. It is intended for the development of multifamily residential units with a minimum density of 16 dwelling units (DUs) per acre and a maximum allowable density of 20 DUs per acre, as outlined in Section 9.03.020 of the MVMC.

Upon approval of the General Plan Amendment and Change of Zone, the project will be consistent with both the updated land use designation and zoning classification for the site. *Figure 4, Zoning Map*, and *Figure 5, General Plan Designations*, illustrate the existing and proposed land use and zoning designations for the project site.

Project Characteristics

The proposed development will include 184 apartment units ranging in size from 730 square feet (SF) (Plan 1 – 1 bedroom/1 bathroom) to 1,090 SF (Plan 2 – 2 bedrooms/2 bathrooms), offered across four distinct floor plans. New landscaping and pedestrian walkways will be integrated throughout the development to enhance connectivity and aesthetic appeal.

Each apartment unit will feature a 150 SF covered patio and a 105 SF balcony, providing private outdoor space for residents. The 8-plex apartment buildings will be similar in scale to the surrounding large single-family homes and will be thoughtfully distributed throughout the project site to ensure visual harmony with the neighborhood context.

Architectural Design

The proposed two-story apartment buildings will feature two distinct architectural styles, offering both aesthetic variety and visual interest throughout the complex. Designed with a blend of Spanish and Cottage architectural elements, the buildings will feature multi-level rooflines, and an earth tone color palette. Exterior finishes will incorporate stucco and stone, complemented by classic clay tile roofs, and balconies with metal railings. Decorative windows, columns and doors will further enhance the architectural character. The buildings will not exceed a height of approximately 33 feet. These elevations are displayed in Appendix J- Project Plans, 2025.

Access and Circulation

Primary vehicular access to the project site will be provided via a new driveway and gated entrance on Cottonwood Avenue. A secondary emergency vehicular access (EVA) will be located on Watson Way, and a third EVA will be provided on Patricia Lane, as confirmed in email communication with the City of Moreno Valley Fire Department on August 13, 2024. The apartments units will be accessed via private driveway along the internal roadways, as illustrated in *Figure 3, Conceptual Site Plan*.

Landscaping, Fences and Walls

Landscaping proposed as part of the project would consist of drought-tolerant ornamental trees, shrubs, and groundcovers. Turf will be installed in active-use areas within common open spaces, including around the clubhouse and dog park. The landscape plan will be consistent with the City's landscape and irrigation design standards, as outlined in MVMC Section 9.17.030.

The project site will be enclosed with a six-foot high block along its perimeter. *Figure 6, Landscape Plan*, illustrates the proposed landscaping for the project, while *Figure 7, Wall and Fence Plan*, depicts the proposed walls and fencing for the project.

Lighting

Outdoor lighting associated with the future development on the project site will be typical of an apartment complex. It will include wall-mounted fixtures as well as pole-mounted lights along the roadways. Nighttime security lighting will be installed at the clubhouse, the open space recreation area, and the dog park.

All outdoor lighting will be directed downward and shielded to minimize off-site light and glare. The placement of exterior lighting will comply with the standards established in the MVMC Section 9.08.100 (Lighting). A final lighting plan will be submitted and reviewed by the Building and Safety Division prior to the issuance of any permits.

Infrastructure Improvements

Water and Sewer

The project will utilize existing sewer and sanitation infrastructure located within the public right-of-way in the City of Moreno Valley.

Drainage

Off-site flows from Bencliff Avenue and Tacoma Drive will be routed through the project site and into Sunnymead Line P in Cottonwood Avenue. Off-site flows from Birchwood Drive North and Birchwood Drive South will be directed into Sunnymead Line P via a proposed new connection on Watson Way. The off-site flows will enter the proposed new connection on Watson Way. These off-site flows will enter the proposed catch basins and connect into the existing 96-inch storm drain (SD line).

Existing off-site flows, along with runoff from Watson Way, naturally drain to the existing catch basin along Cottonwood Avenue that leads into the same 96-inch storm drain. The proposed on-site storm drain inlets, drain lines, catch basins are located in the

southeast corner of the project site which would assist in minimizing the potential for flow impediment or redirection of floodwater.

CONSTRUCTION DURATION AND ZONING

The project site is vacant with no existing structures. Construction activities will include the demolition of pavement and the existing utility infrastructure; grubbing, grading, excavation and re-compaction of soils; utility and infrastructure installation; building construction; roadway paving; and architectural coatings. Grading will involve 805 cubic yards of cut and 14,893 cubic yards of fill, which is proposed to be imported during grading activities.

The project's construction activities are expected to occur over an 18 month period, beginning in 2025, with occupancy anticipated in 2026. Construction will take place in the following stages: site preparation, grading, building construction, architectural coating, and paving.

DISCRETIONARY APPROVALS

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

CITY OF MORENO VALLEY

- General Plan Amendment (PEN24-0133) to change the site's land use designation from Residential 10: Max. 10 du/ac (R10) to Residential 20: Max. 20 du/ac (R20)
- Change of Zone (PEN24-0134) from Residential 10 District (R10) to Residential 20 (R20) District
- Plot Plan (PEN24-0075) for development of a 184 unit apartment complex.

FIGURE 1 - REGIONAL LOCATION MAP



Project Site

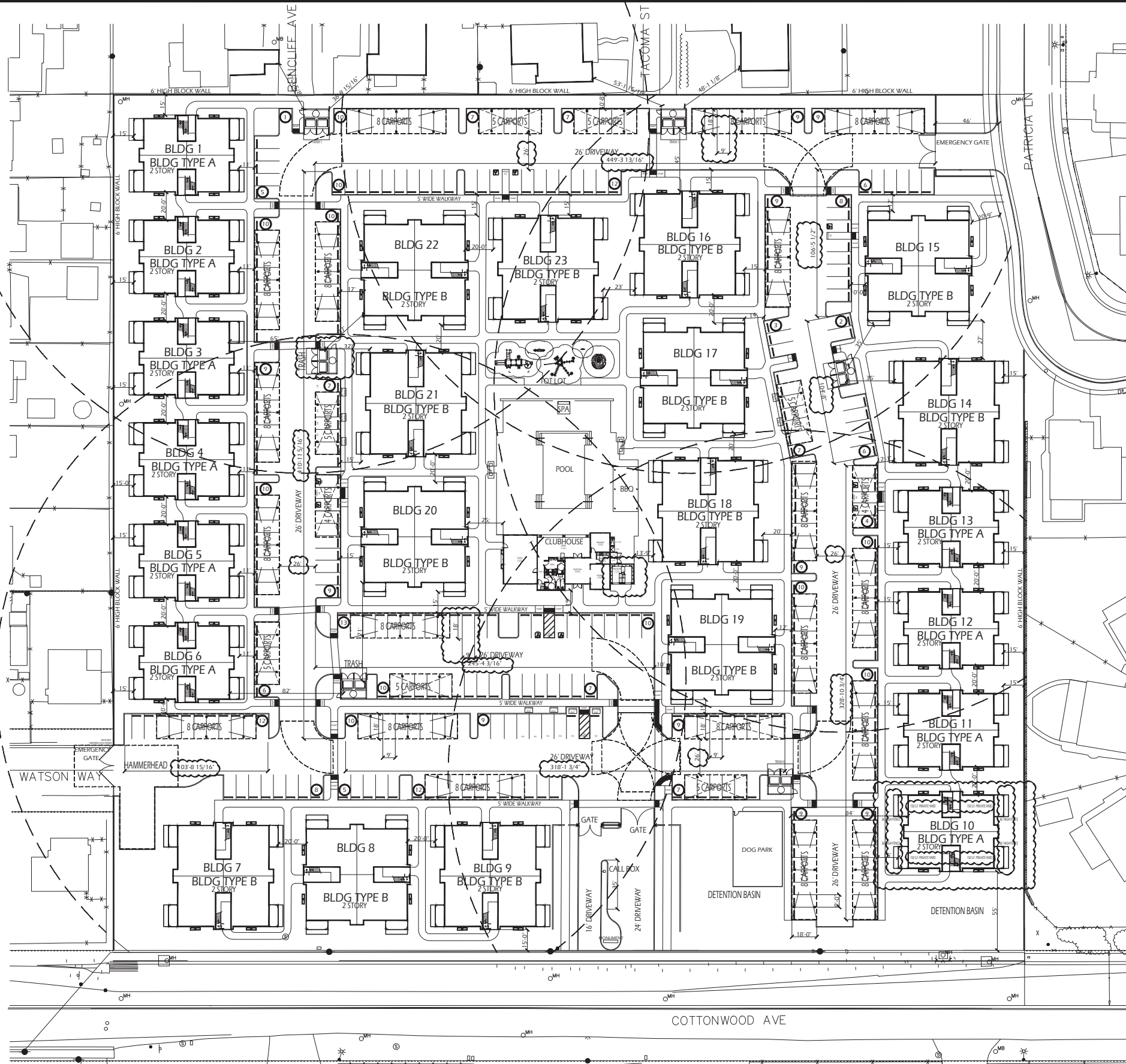
Author: Moe Farrag
Date: 10/6/2023



Loma Linda University, UC Riverside, City of Moreno Valley, County of Riverside, California State Parks, Esri, HERE, Garmin, SafeGraph, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA

FIGURE 2 - PROJECT VICINITY MAP

FIGURE 3 - CONCEPTUAL SITE PLAN



ELECTRIC VEHICLE CHARGING STATIONS

TOTAL EVC ACTIVE SPACES REQUIRED: 18 SPACES
 334 SPACES X 5%
 CARPORTS: 190 X 5% 10 SPACES
 OPEN SPACES: 144 X 5% 8 SPACES

PROVIDE CONDUIT, ELECTRICAL RUN AND BOXES FOR ACTIVE ELECTRICAL VEHICLE CHARGERS FOR 18 SPACES.

TOTAL EVC READY SPACES REQUIRED: 86 SPACES
 334 SPACES X 25%
 CARPORTS: 190 X 25% 48 SPACES
 OPEN SPACES: 144 X 25% 38 SPACES

PROVIDE CONDUIT & ELECTRICAL RUN STUB OUTS FOR READY ELECTRICAL VEHICLE CHARGERS FOR 86 SPACES.

TOTAL EVC CAPABLE SPACES REQUIRED: 34 SPACES
 334 SPACES X 10%
 CARPORTS: 190 X 10% 19 SPACES
 OPEN SPACES: 144 X 10% 15 SPACES

PROVIDE CONDUIT FOR 34 FUTURE ELECTRICAL VEHICLE CHARGERS FOR 34 SPACES.

PARKING ANALYSIS

PARKING REQUIRED:
 1 BDRM: 80 D.U. X 1.5 SPACES = 120 SPACES
 2 BDRM: 104 D.U. X 2 SPACES = 208 SPACES

TOTAL: 184 D.U. 328 SPACES

QUANTITY PROVIDED: 334 SPACES

TYPE	QUANTITY REQUIRED	QUANTITY PROVIDED
CARPPTS:	184 SPACES	187 SPACES
OPEN SPACES:	141 SPACES	147 SPACES
HANDICAP SPACES:		
CARPTS: 187 X 2%	4 SPACES	4 SPACES
OPEN SPACES:		
ASSIGNED: 107 X 2%	3 SPACES	3 SPACES
GUEST: 40 X 5%	2 SPACES	2 SPACES

CARPPTS
 8-CARPOT UNITS: 18 X 8 = 144 SPACES
 5-CARPOT UNITS: 7 X 5 = 35 SPACES
 4-CARPOT UNITS: 2 X 4 = 8 SPACES
SUMMARY OF PARKING SPACES:
 TOTAL COVERED SPACES: 187
 TOTAL UNCOVERED SPACES: 147
 OVERALL TOTAL PARKING SPACES: 334

PARKING SPACE SIZES:
 ALL OPEN NON-HANDICAP PARKING SPACES SHALL BE 9' WIDE BY 18' DEEP WITH WHEEL STOPS WHEN PARKING SPACES ARE ADJACENT TO WALKWAYS. STRIPING SHALL BE 4" WIDE PAINTED ON TOP OF PAVING.

ALL CARPTS SHALL BE 9' WIDE BY 18' DEEP.

TRASH:
 LARGE DASHED TRUNCATED CIRCLES INDICATE 250' RADIUS FOR TRASH ENCLOSURE DISTANCE OF TRAVEL

6 DOUBBLE BIN ENCLOSURES PROVIDED ALLOWING 288 D.U.

BUILDINGS SUMMARY

BUILDING TYPE A

PLAN NO.	D.U. S.F.	COVERED PATIO S.F.	BALCONY S.F.	QUANTITY
1	730 S.F.	105 S.F.	105 S.F.	8 D.U.
TOTAL:	5,840 S.F.	420 S.F.	420 S.F.	8 D.U.

BUILDING TYPE B

PLAN NO.	D.U. S.F.	COVERED PATIO S.F.	BALCONY S.F.	QUANTITY
2	1,090 S.F.	101 S.F.	101 S.F.	8 D.U.
TOTAL:	8,720 S.F.	404 S.F.	404 S.F.	8 D.U.

CLUBHOUSE
 CLUBHOUSE: 2,218 S.F.
 MAILROOM: 253 S.F.
 LANAL: 732 S.F.

BUILDINGS TOTAL

BLDG. NO.	D.U. S.F.	COVERED PATIO S.F.	BALCONY S.F.	QUANTITY
A	58,400 S.F.	4,800 S.F.	4,800 S.F.	10 BLDGS.
B	113,360 S.F.	6,240 S.F.	6,240 S.F.	13 BLDGS.
CLUB:	2,471 S.F.			
TOTAL:	174,231 S.F.	11,040 S.F.	11,040 S.F.	24 BLDGS.

PARKING LOT SUMMARY
 PARKING LOT AREA: 124,445 S.F.

COMMON OPEN SPACE SUMMARY
 NET SITE AREA: 403,540 S.F.
 PARKING LOT AREA: 124,445 S.F.
 BUILDINGS' FOOTPRINTS: 100,398 S.F.
 COMMON OPEN SPACE: 178,967 S.F. [44.2%]

COMMON SPACE REQUIRED: 184 D.U. X 300 S.F. = 55,200 S.F.
COMMON SPACE PROVIDED: 178,967 S.F.

PLAN	SO. FTG.	BDRMS	BATHS	BALCONY	QUANTITY
1	730 S.F.	1	1	105 S.F.	80 D.U. [43.5 PERCENT]
2	1,090 S.F.	2	2	101 S.F.	104 D.U. [56.5 PERCENT]
TOTAL:					184 D.U.

PROJECT SUMMARY

CURRENT GENERAL PLAN: R10
 CURRENT ZONE: R10
 PROPOSED GENERAL PLAN: R20
 PROPOSED ZONE: R20

APN: 077-140-022
 GROSS SITE AREA: 9.398 ACRES [406,329.34 S.F.]
 NET SITE AREA: 9.368 ACRES [407,630 S.F.]
 LAND USE: MULTI-FAMILY APARTMENTS
 MIN DENSITY: 16 UNITS/ACRE X 9.390 = 151 UNITS
 MAX DENSITY: 20 UNITS/ACRE X 9.390 = 187 UNITS
 PROPOSED DENSITY: 19.59 UNITS
 PROPOSED UNITS: 184 UNITS
 CONSTRUCTION TYPE: TYPE V-B, SPRINKLERED
 OCCUPANCY TYPE: R-2, B, U

THIS PROJECT WILL BE EVALUATED UNDER THE 2006 GENERAL PLAN THE STREET PAVEMENT WILL BE WIDENED AND CURB & GUTTER CONSTRUCTED FROM THE PROJECTS BOUNDARY TO WHERE THE EXISTING CONCRETE CURB & GUTTERS STARTS ABOUT 220' TO THE WEST

TYPE-A BUILDING:
 FIRST FLOOR: 730 SF/UNIT X 40 = 29,200 SF
 SECOND FLOOR: 730 SF/UNIT X 40 = 20,200 SF
 PATIO COVER: 105 SF X 20 = 2,100 SF
 BALCONY: 105 SF X 20 = 2,100 SF
 UTILITY CLOSET: 33 SF X 20 = 660 SF
 STAIRS: 91 SF X 20 = 1,820 SF
 LANDING: 69 SF X 20 = 1,389 SF

TYPE-B BUILDING:
 FIRST FLOOR: 1,092 SF/UNIT X 52 = 56,784 SF
 SECOND FLOOR: 1,092 SF/UNIT X 52 = 56,784 SF
 PATIO COVER: 100 SF X 52 = 5,200 SF
 BALCONY: 100 SF X 52 = 5,200 SF
 UTILITY CLOSET: 33 SF X 26 = 858 SF
 STAIRS: 72 SF X 26 = 1,872 SF
 LANDING: 66 SF X 26 = 1,716 SF

CLUBHOUSE: 2,218 SF
 MAIL ROOM: 253 SF
 LANAL: 732 SF

5 SPACE CARPTS: 7,245 SF
 8 SPACE CARPTS: 23,210 SF

TRASH ENCLOSURES: 261 SF X 6 OF
 TRASH ENCLOSURES = 1,566 SF

HABITABLE SPACE TOTAL: 174,231 SF

NON-HABITABLE SPACE TOTAL: 14,457 SF

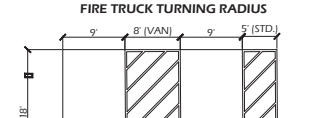
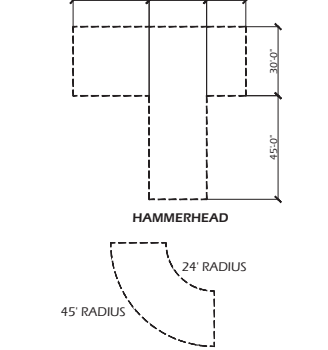
NET MAX LOT COVERAGE: 403,540 SF X 0.50% = 201,770 SF
 PROPOSED LOT COVERAGE: 188,688 SF / 403,540 SF = 46.7% (< 0.50%)

MAX FAR (FLOOR AREA RATIO): 403,540 SF X 0.75 = 302,665 SF
 PROPOSED FAR: 302,665 SF / 409,028 SF = .75 (< 0.75)

PRIVATE OPEN SPACE

TYPE A:
 1ST FLOOR: REQUIRED: 40 UNITS X 150 SF = 6,000 SF
 PROPOSED: 40 UNITS X 150 SF = 6,000 SF
 2ND FLOOR: REQUIRED: 40 UNITS X 100 SF = 4,000 SF
 PROPOSED: 40 UNITS X 105 SF = 4,200 SF

TYPE B:
 1ST FLOOR: REQUIRED: 52 UNITS X 150 SF = 7,800 SF
 PROPOSED: 52 UNITS X 150 SF = 7,800 SF
 2ND FLOOR: REQUIRED: 52 UNITS X 100 SF = 5,200 SF
 PROPOSED: 52 UNITS X 100 SF = 5,200 SF



STANDARD PARKING
 STANDARD PARKING SPACES SHALL BE 9'X18' TYPICAL

HVAC CONDENSER

COTTONWOOD APARTMENTS
 COTTONWOOD AVENUE, MORENO VALLEY, CA
 184 Apartment Homes

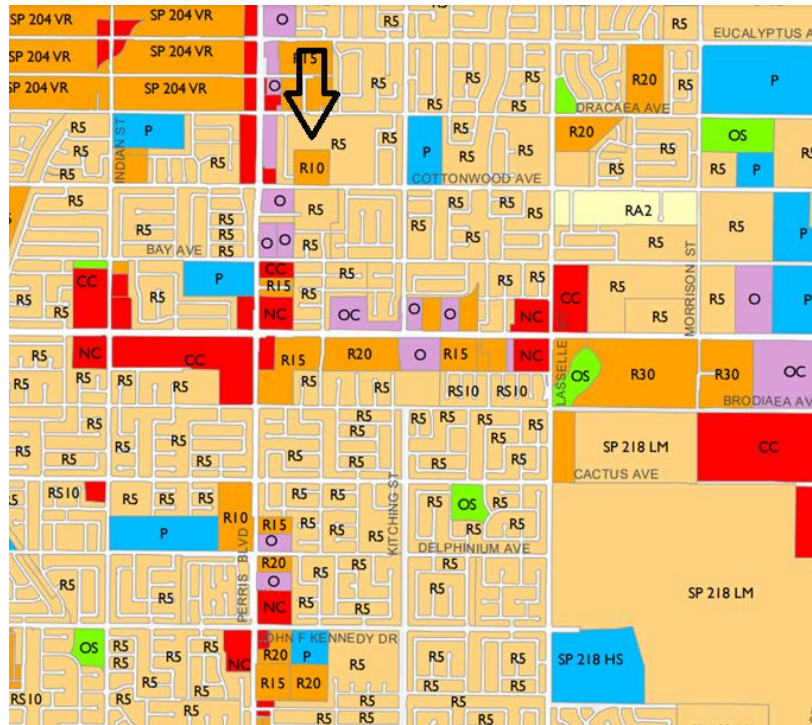


SCHEMATIC SITE PLAN 10

MICHAEL McHALE, ARCHITECT
 (949) 566-4951
 2/24/25
 SCALE: 1" = 30' - 0"

FIGURE 4 - ZONING DISTRICTS

Existing Zoning District



Proposed Zoning District

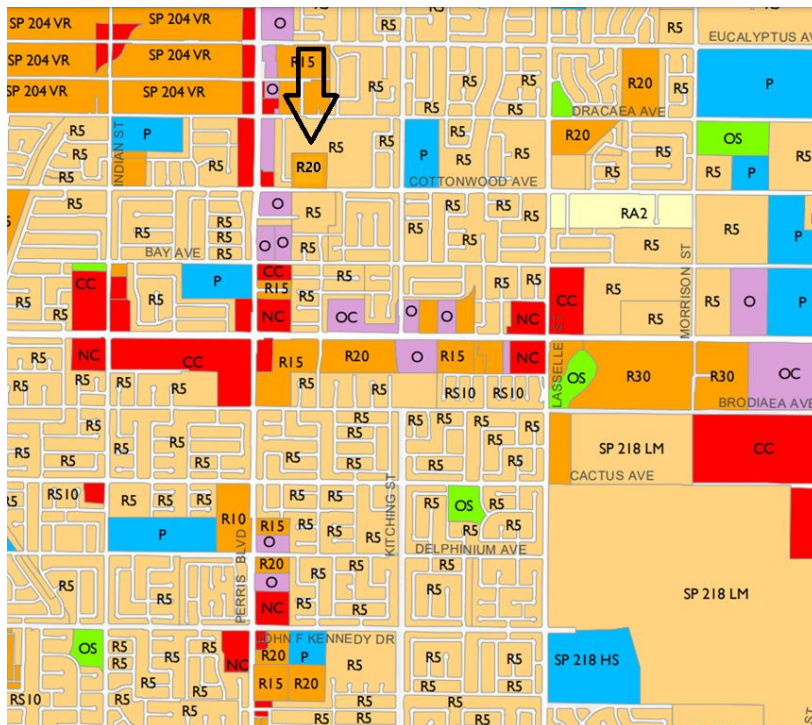
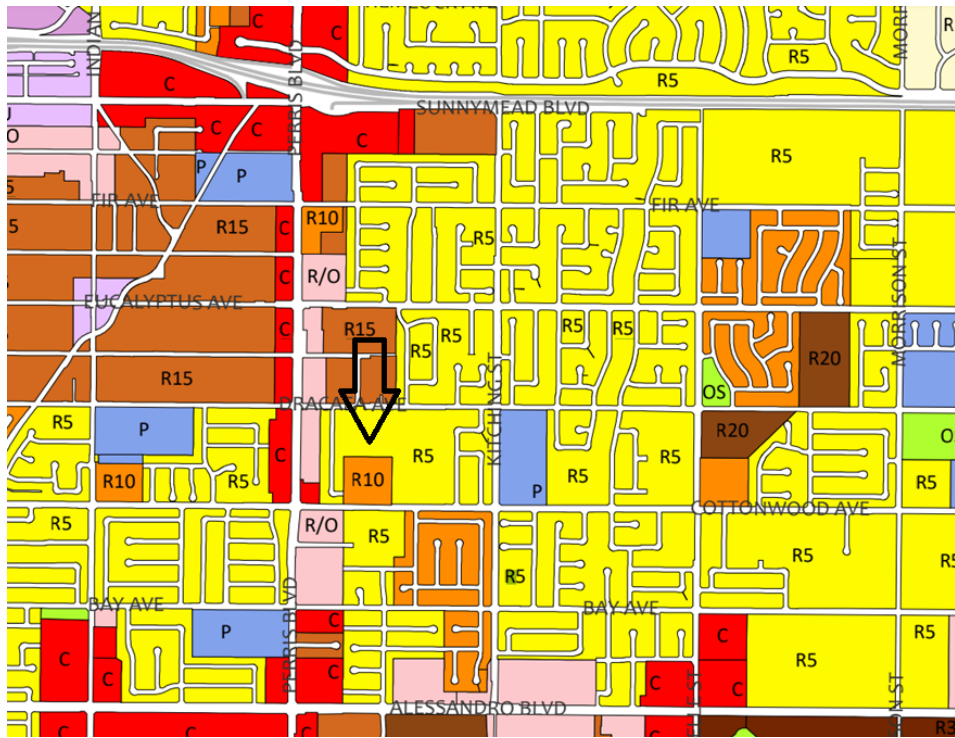


FIGURE 5 - GENERAL PLAN DESIGNATIONS

Existing General Plan Designations



Proposed General Plan Designations

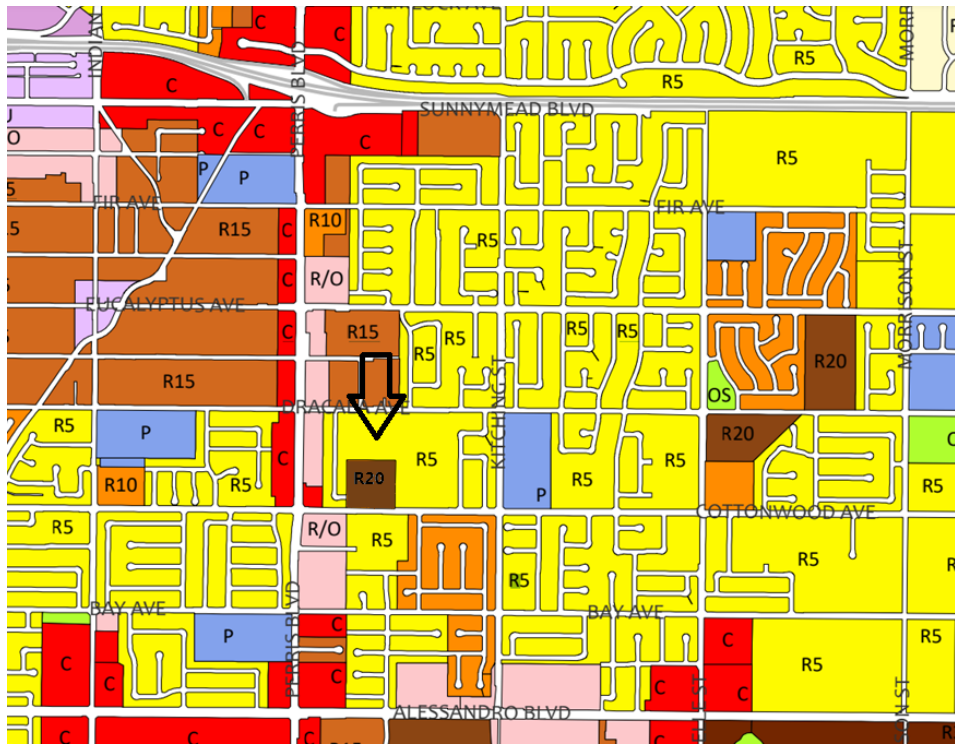


FIGURE 6 - LANDSCAPE PLAN



PLANT LEGEND

	ACCENT PALMS: PHOENIX DACTYLIFERA WASHINGTONIA ROBUSTA	18" BTH OR TALLER
	LARGE ACCENT TREES: KOELREUTERIA PANICULATA JACARANDA MINOSFOLIA	36" BOX OR LARGER
	LARGE CANOPY TREES: ULMUS PARVIFOLIA PLATANUS ACERIFOLIA 'BLOODGOOD' GEUERA PARVIFLORA	24" BOX OR LARGER
	SMALL ACCENT TREES: LAGERSTROEMIA INDICA 'MUSKOGEE' OR 'NATCHEZ' CERCIS OCCIDENTALIS PHOENIX ROBELENI OLEA EUROPAEA 'WILSONII' CERODIUM 'DESERT MUSEUM' CHILOPSIS LINEARIS	24" BOX OR LARGER
	BACKGROUND TREES: PINUS ELDERICA RHUS LANCEA LOPHOSTEMON CONFERTA	15 GALLON OR LARGER
	VERTICAL FOUNDATION TREES: CUPRESSUS SEMPERVIRENS 'STRICTA' PODOCARPUS ELONGATUS PRUNUS C. 'BRIGHT N TIGHT'	15 GAL. OR LARGER

LEGEND

1. PLANTING AREA
2. NATURAL GRAY CONCRETE PAVING
3. ENHANCED ACCENT PAVING W/ CONCRETE BANDING
4. LARGE ACCENT TREES (36" BOX MIN.)
5. LARGE CANOPY TREE (24" BOX MIN.)
6. SMALL ACCENT TREE (15 GAL. MIN.)
7. BACKGROUND TREES (15 GAL. MIN.)
8. VERTICAL FOUNDATION TREES (15 GAL. MIN.)
9. ACCENT ONSITE PALM TREES
10. ASPHALT DRIVEWAY / PARKING STALLS
11. TRASH ENCLOSURE LOCATIONS PER ARCHITECT'S PLANS
12. TUBULAR STEEL FENCING, 6'HT., ALONG NORTHERLY PROPERTY LINE AT TACOMA ST. AND BENCLIFF AVE., 10' LONG. OPEN FENCING SECTION EACH FOR EMERGENCY STORM RUNOFF CONDITION. (CITY'S REQUEST)
13. SECONDARY EVA STEEL GATES W/ A KNOX RAPID ENTER SYSTEM
14. PARKING STALLS W/ CARPORT PER ARCHITECT'S PLANS
15. PRIMARY STONE PROJECT ID SIGNAGE WALL LOCATION
16. FIRE ACCESS HUMMER HEAD DRIVEWAY
17. BENCH SEATING AND TRASH RECEPTACLE
18. TABLE SET W/ UMBRELLA / LOUNGE CHAIRS / ADIRONDACK CHAIRS
19. COLORED CONCRETE POOL DECK WITH CUT STONE PAVER BANDING
20. BARBECUE COUNTER W/ STEEL SHADE OVERHEAD TRELLIS STRUCTURE - OPTIONAL
21. LOW STONE SEAT WING WALLS
22. STEEL POOL ENTRY GATE W/ PANIC BAR AND OPTIONAL STEEL OVERHEAD TRELLIS STRUCTURE
23. POOL AREA STEEL FENCING
24. SWIMMING POOL W/ MOSAIC TILE BANDING, WATER LINE TILES, AND CUT STONE COPING
25. SQUARE SPA WITH STONE FOUNTAIN WALL, WATER SPILLED INTO SPA
26. LINEAR GAS FIRE PIT W/ LOOSE PEBBLE ROCKS
27. MASONRY BUILT-IN SEATING W/ BACK SUPPORT
28. PROPERTY CMU BLOCK WALL
29. PROPERTY CMU BLOCK PILASTERS
30. EXISTING MASONRY BLOCK WALL TO REMAIN
31. DECORATIVE LEDGE STONE PILASTER
32. DECORATIVE LEDGE STONE ENTRY WALL
33. DETENTION BASIN AREAS TO RECEIVE LOW GROWING SHRUB OR GRASS MATERIALS
34. DOG PARK AREA WITH SYNTHETIC TURF OR DECOMPOSED GRANITE
35. BENCH SEATING AT DOG PARK
36. DOG PARK ENTRY W/ WATER FOUNTAIN AND BAG DISPENSER, SIGNAGE AND TRASH RECEPTACLE
37. TOT LOT AREA W/ COLORED RUBBERIZED OR ENGINEERED MULCHED SURFACE
38. PLAY EQUIPMENT
39. POTTED PLANTING
40. SYNTHETIC TURF POOL DECK
41. VEHICULAR ENTRY STEEL GATES W/ KNOX BOX
42. PEDESTRIAN ENTRY STEEL GATE W/ OPTIONAL STEEL OVERHEAD TRELLIS
43. CALL BOX LOCATION
44. EXISTING UTILITY LINE TO REMAIN

COTTONWOOD APARTMENTS | Conceptual Landscape Plan

Cottonwood Avenue, Moreno Valley, CA | February 28, 2025

NOTE: ALL LANDSCAPING INSTALLED AS PART OF THIS PROJECT SHALL BE MAINTAINED BY THE PROPERTY OWNER, NOT THE CITY.

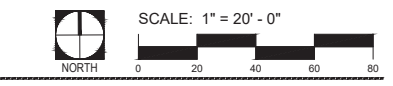
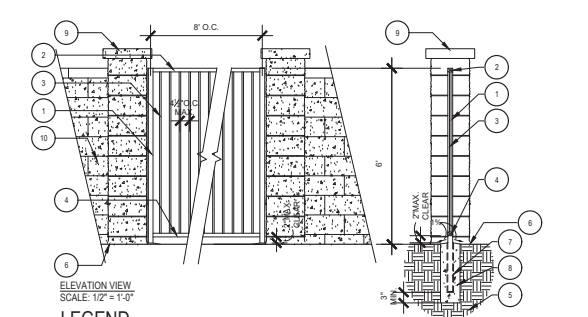
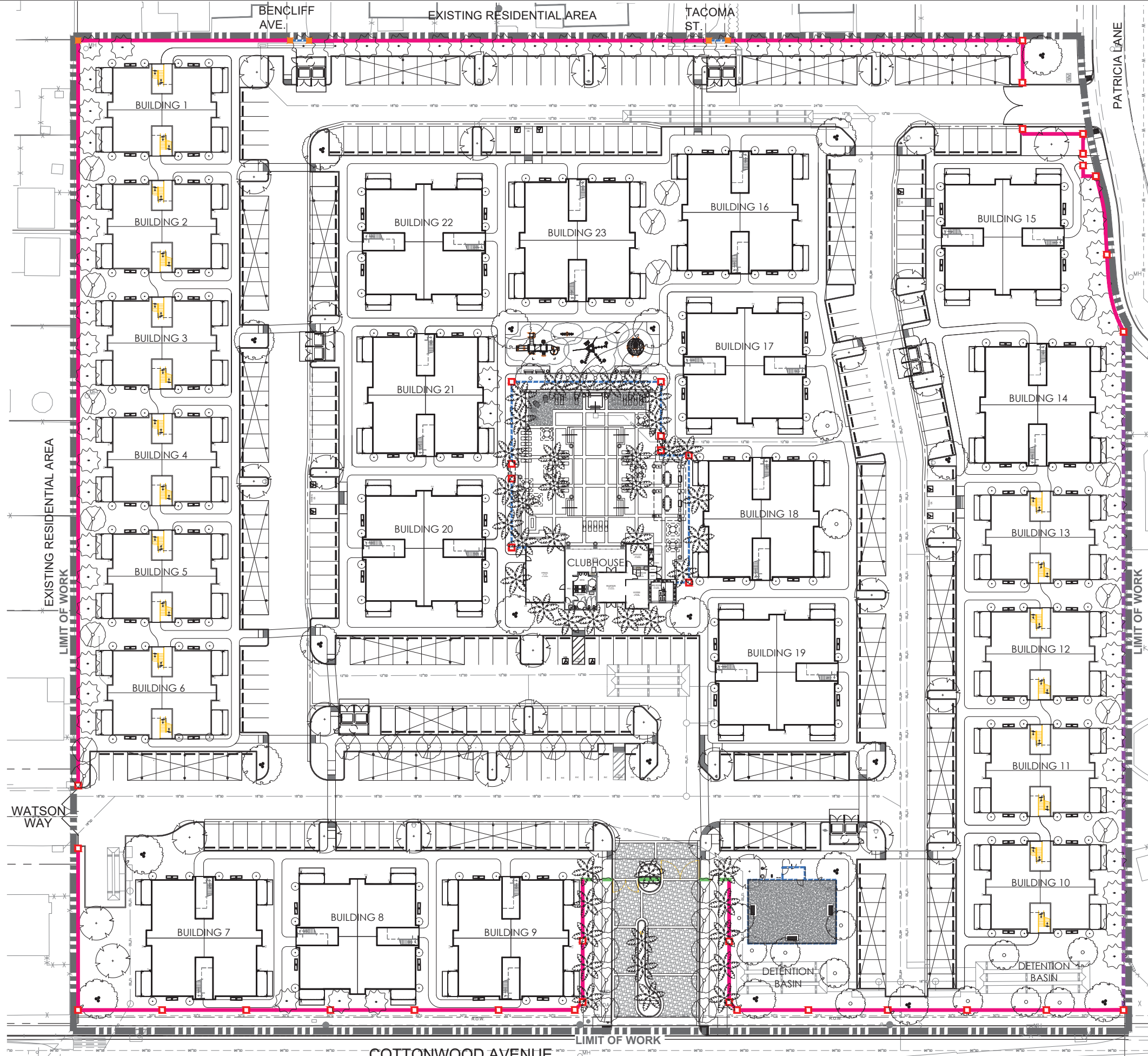
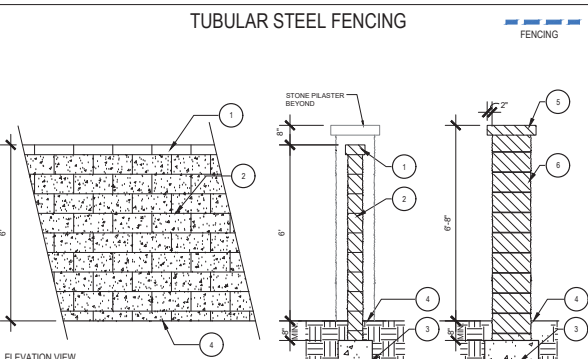


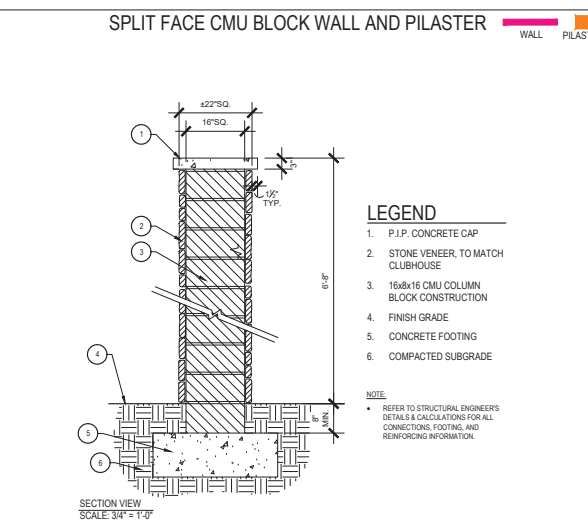
FIGURE 7 - WALL AND FENCE PLAN



- LEGEND**
- 2" SQ. TUBULAR STEEL POST
 - 1/2" SQ. TUBULAR STEEL TOP RAIL
 - 1/2" SQ. TUBULAR STEEL PICKETS @ 4" MAXIMUM O.C.
 - 1/2" SQ. TUBULAR STEEL BOTTOM RAIL
 - COMPACTED SUBGRADE
 - FINISH GRADE
 - SINK POST INTO FOOTING
 - CONCRETE FOOTING
 - SPLIT-FACE C.M.U. BLOCK PLASTER - REFER TO CMU BLOCK PLASTER AND WALL DETAIL BELOW
 - SPLIT-FACE C.M.U. BLOCK WALL - REFER TO CMU BLOCK PLASTER AND WALL DETAIL BELOW
- NOTES:**
- REFER TO STRUCTURAL ENGINEER'S DETAILS & CALCULATIONS FOR ALL CONNECTIONS, FOOTING, AND REINFORCING INFORMATION.
 - ALL WELDS TO BE CONTINUOUS AND GROUND SMOOTH.
 - ALL EXPOSED SURFACES SHALL RECEIVE TWO (2) COATS OF MOISTURE-PROOF PRIMER AND TWO (2) FINISH COATS. REFER TO FINISH SCHEDULE FOR COLOR.
 - ALL CONNECTORS, FASTENERS AND OTHER HARDWARE TO BE HOT-DIPPED GALVANIZED. PICKETS AND INTERMEDIATE RAILINGS SHALL BE PROVIDED SUCH THAT A 4-INCH DIAMETER SPHERE CANNOT PASS THROUGH ANY OPENING.



- LEGEND**
- 6"x16" PRECISION CMU BLOCK WALL CAP
 - 6"x16" SPLIT-FACE CMU BLOCK
 - CONCRETE FOOTING
 - FINISH GRADE
 - 4" PRECISION CMU BLOCK CAP
 - 16"x16" SPLIT-FACE CMU BLOCK
- NOTES:**
- REFER TO STRUCTURAL ENGINEER'S DETAILS & CALCULATIONS FOR ALL CONNECTIONS, FOOTING, AND REINFORCING INFORMATION.

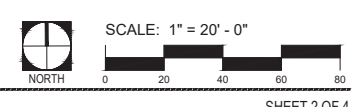


- LEGEND**
- P.I.P. CONCRETE CAP
 - STONE VENEER TO MATCH CLUBHOUSE
 - 16"x16" CMU COLUMN BLOCK CONSTRUCTION
 - FINISH GRADE
 - CONCRETE FOOTING
 - COMPACTED SUBGRADE
- NOTES:**
- REFER TO STRUCTURAL ENGINEER'S DETAILS & CALCULATIONS FOR ALL CONNECTIONS, FOOTING, AND REINFORCING INFORMATION.

- WALL & FENCE LEGEND**
- 6'-0" HIGH TUBULAR STEEL FENCING, COLOR: BLACK - SEE DETAIL ABOVE
 - 6'-0" HIGH SPLIT-FACE CMU BLOCK WALL WITH 4" THICK PRECISION CMU BLOCK CAP, COLOR: WHEAT - SEE DETAIL ABOVE
 - EXISTING CMU BLOCK WALL TO REMAIN
 - 6'-8" HIGH, 24" SQ. LEDGE STONE PILASTER W/ STONE CAP - SEE DETAIL ABOVE
 - 6'-8" HIGH, 16" SQ. SPLIT-FACE CMU BLOCK PLASTER WITH 4" THICK PRECISION CMU BLOCK CAP, COLOR: WHEAT - SEE DETAIL ABOVE
 - 7'-0" HT. ENTRY AREA LEDGE STONE WALL W/ ENTRY GATES - SEE ELEVATION ON SHEET 3

COTTONWOOD APARTMENTS | Conceptual Wall & Fence Plan

Cottonwood Avenue, Moreno Valley, CA | February 28, 2025



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

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

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

The following California Native American tribes and individuals traditionally and culturally affiliated with the project Area have been notified of the project: San Manuel Band of Mission Indians (SMBMI), Morongo Band of Mission Indians (Morongo), Colorado River Indian Tribes (CRIT), Fort Mohave Indian Tribe (FMIT), Soboba Band of Luiseno Indians, and Twenty-Nine Palms Band of Mission Indians. Response letters were received from FMIT, SMBMI, and Morongo. The FMIT indicated that the project as described shows that there is no substantial evidence that there would be a significant effect on FMIT tribal cultural resources. Formal consultation was requested by the SMBMI which took place on November 17, 2019, and also by the Morongo which took place on January 16, 2020. Formal consultation with Pechanga was completed in May 2026. Formal consultation with Agua Caliente and Rincon was completed in August 2025. The resulting recommended mitigation and monitoring measures have been added to Section V Cultural Resources and Section XVIII Tribal Cultural Resources of this document.

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

- City of Moreno Valley
- Eastern Municipal Water District
- South Coast Air Quality Management District
- Regional Water Quality Control Board
- Moreno Valley Fire Department
- Southern California Gas Company
- Southern California Edison Company

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

Technical Studies referenced in this Initial Study are shown in the Appendices above.

17. Acronyms:

AAM -	American Association of Museums
AB -	Assembly Bill
AFY-	Acre-feet per year
APN -	Assessor's Parcel Number
APS -	Alternative Planning Strategy
AQMP -	Air Quality Management Plan
AMSL -	Above Mean Sea Level
BMP -	Best Management Practices
BRA -	Biological Resource Assessment
BUOW -	Burrowing Owl
CAL Green -	California Green
Cal REG -	California Register of Historical Resources
Cal Recycle -	California Department of Resources Recycling and Recovery
CALPADS -	California Longitudinal Pupil Achievement Data System
CARB -	California Air Resource Board
CASGEM -	California Statewide Groundwater Elevation Monitoring
CBC -	California Building Code
CDE -	California Department of Education
CDFW -	California Department of Fish and Wildlife
CEQA -	California Environmental Quality Act
CHL -	California Historical Landmarks
CHMIRS -	California Hazardous Material Incident Report System
CHRIS -	California Historical Resources Information System
City -	City of Moreno Valley
CMU -	Concrete Masonry Wall
CO2 -	Carbon dioxide
CO2e -	Carbon Dioxide Equivalent
CRMP -	Cultural Resource Monitoring Plan
CRS -	Cultural Resources Survey
CWA -	Clean Water Act
CRIT -	Colorado River Indian Tribes
DOC -	Department of Conservation
DTSC -	Department of Toxic Substances Control
DWS -	Department of Water Resources
EMWD -	Eastern Municipal Water District
ESA -	Environmental Site Assessment
ESA -	Environmentally Sensitive
EVA -	Emergency Vehicular Access
FGC -	Fish and Game Commission
FEMA -	Federal Emergency Management Agency
FMIT -	Fort Mohave Indian Tribe
GHG -	Greenhouse Gas
GPD -	Gallons per day
HGL -	Hydraulic Grade Line
HMU -	Habitat Management Unit
HPD -	California State Historic Properties Directory
LUST -	Leaking Underground Storage Tanks
MGD -	Million Gallons of Wastewater per day
MM -	Mitigation Measure
MPO -	Metropolitan Planning Organizations
MSHCP -	Multiple Species Habitat Conservation Plan
MVFD -	Moreno Valley Fire Department
MVMC -	Moreno Valley Municipal Code
MVU -	Moreno Valley Electrical Utility

MVUSD -	Moreno Valley Unified School District
NAHC -	Native American Heritage Commission
NBP -	Nesting Bird Plan
NOx -	Nitrous Oxides
NPDES-	National Pollutant Discharge Elimination System
PCOS -	Park Conservation and Open Space
PM10 -	Fugitive Dust Emissions
R10 -	Residential 10 DU per acre, Multi Family Residential
R20 -	Residential 20 DU per acre, Multi Family Residential
RCFPD-	Riverside County Fire Protection District
RWQCB -	Regional Water Quality Control Board
ROG -	Reactive Organic Gases
SCAQMD -	South Coast Air Quality Management District
SMARA -	Surface Mining and Reclamation Act
SCS -	Sustainable Community Strategy
SF -	Square Feet
SGMA -	Sustainable Groundwater Management Act (SGMA)
SHPO -	State Historic Preservation Officer
SJGB -	San Jacinto Groundwater Basin
SMBMI -	San Manuel Band of Mission Indians
SR-74 -	State Route 74
SR-243 -	State Route 243
SR-	Special Report
SWCP -	Stormwater Control Plan
SWPPP -	Stormwater Pollution Prevention Plan
SWRCB -	State Water Resources Control Board
TPA -	Transit Priority Area
USACE -	U.S. Army Corps of Engineers
USFWS -	U.S. Fish and Wildlife
USGS -	United States Geological Services
UWMP -	Urban Water Management Plan
VMT -	Vehicle Miles Traveled
WOTUS -	Waters of the U.S.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION (To be completed by the Lead Agency):

On the basis of this initial evaluation:

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



 Signature
 Julia Descoteaux

 Printed Name

5/13/2026

 Date
 City of Moreno Valley

 For

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a Lead Agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the Lead Agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or another CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analyses Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). Reference to a previously prepared or outside document should, where

appropriate, include a reference to the page or pages where the statement is substantiated.

- 7) Supporting Information Sources. A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code §21099 – Modernization of Transportation Analysis for Transit-Oriented Infill Projects – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. The proposed project is an apartment complex that would be compatible with the surrounding residential uses. The development will consist of 23 two-story buildings, each containing eight apartment units, for a total of 184 residential units. The unit mix will include 80 one-bedroom units and 104 two-bedroom units, offering a range of housing options for future residents.</p> <p>The proposed project is located in an area where all the surrounding parcels are developed. The project site is primarily surrounded by one- and two-story single-family residential homes to the north and east. To the west, the site is bordered by additional single-family homes, a gas station, and a shopping center across Perris Boulevard. To the south, across Cottonwood Avenue, lies St. Christopher Parish Catholic church, a single-family home, and a storage yard with a gas station. There are 5 bus stops within a 1-mile radius of the proposed project</p> <p>The proposed project is located within the City of Moreno Valley, which adheres to the 2006 General Plan and the upcoming 2040 General Plan. According to the City of Moreno Valley’s 2006 General Plan, the proposed project includes a Zone Change from Residential 10 (R10) to Residential 20 (R20) and a corresponding General Plan Amendment to change the land use designation from R10 to R20. However, if the City of Moreno Valley 2040 General Plan is approved prior to Project approval, the Project would not require the proposed Project to conduct a zone change, as the Project’s underlying zoning is consistent with the 2040 General Plan.</p> <p>The proposed project complies with Chapter 7, the Conservation Element, of the City of Moreno Valley’s 2006 General Plan that addresses the major scenic resources throughout the City of Moreno Valley. Section 7.7 of the 2006 General Plan, Scenic Resources, identifies Box Springs Mountains, Moreno Peak, and Mount Russell foothills as major scenic resources (7.7 Scenic Resources). The proposed project does not fall within or adjacent to an identified view corridor, as shown on Figure 7-2, <i>Major Scenic Resources</i>, of the 2006 General Plan.</p> <p>The proposed project complies with Chapter 10, the Open Space & Resource Conservation Element, of the City of Moreno Valley’s 2040 General Plan which addresses measures to protect and enhance open space, natural habitat, and biological and cultural resources and strategies to promote the wise use of energy and water while minimizing waste. Scenic resources identified in the 2040 General Plan include Box Springs, Bernasconi Hills, Moreno Peak, Badlands, and Mystic Lake. The proposed project does not fall within or adjacent to an identified view corridor, as shown on Map OSRC-3: Scenic Resources and Ridgelines.</p> <p>Finally, the proposed project will adhere to the City of Moreno Valley Municipal Code design standards, as described in Chapter 9.16 – Design Guidelines (MC Chapter 9.16). This chapter outlines the design standards that limit the height, scale, and color of structures to ensure the structure’s design minimizes impacts to scenic vistas.</p> <p><i>As a result, the proposed project would have no impact on a scenic vista.</i></p>				
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. According to the California Department of Transportation (Caltrans), there are no officially designated state scenic highways within the City of Moreno Valley. The project site is not located along or adjacent to any designated or eligible scenic highways corridors. Thee nearest eligible scenic</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>highways are State Route 74 (SR-74), located approximately 12 miles south of the site, and State Route 243 (SR-243), located approximately 20 miles to the east.</p> <p>Furthermore, the project site is currently vacant and contains no protected trees, rock outcroppings, or historic buildings listed in the State or National Historic Register or the National Register of Historic Places.</p> <p>As such, the proposed project would not result in any adverse effects on scenic highways or other designated scenic resources.</p> <p><i>As a result, no impacts will occur.</i></p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The project site is located within a developed portion of the City of Moreno Valley and is surrounded by residential, commercial, and public facility developments. Thus, for the purposes of this threshold, the analysis considers whether the project would conflict with applicable zoning or design policies intended to project or enhance scenic quality and visual character.</p> <p>The proposed project includes grading and construction of a 184-unit multi-family residential development and would include installation of right-of-way improvements, including sidewalk, street lighting, and landscaping.</p> <p>The architectural design of the proposed project would adhere to the requirements of the 2006 General Plan Community Development Element Policy 2.10.1, which encourages a design there for each new development that is compatible with surrounding existing and planned developments. The design of the proposed project aligns with the surrounding developments within the urbanized area. The project would also adhere to the requirements of the 2006 General Plan Community Development Element Policy 2.10.3, which requires exterior elevations of buildings to have architectural treatments that enhance their appearance. The project would also adhere to the requirements of the 2006 General Plan Community Development Element Policy 2.3.2, which encourages building placement variations, roofline variations, architectural projections, and other embellishments to enhance the visual interest along residential streets.</p> <p>The proposed project would also complies to the 2040 General Plan Open Space & Resource Conservation Element Policy OSRC.2-1, which limits development on hillsides and ridgelines where structures interrupt the skyline and Policy OSRC.2-5, which considers the scenic value of views of hills surrounding Moreno Valley from Gilman Springs Road, Moreno Beach Drive, and State Route 60 and encourage measures to preserve viewsheds, as possible.</p> <p>In addition, as described previously, upon approval of the proposed Zone Change from Residential (R10) to Residential (R20), the proposed project will align with the development standards outlined for the R20 land use and zoning designation. It will also be consistent with the 2006 General Plan's Community Development Element and Conservation Element goals and policies related to scenic quality, as well as the 2040 General Plan's Open Space and Resource Conservation Element and Land Use and Community Character Element goals and policies related to scenic quality.</p> <p>Therefore, the proposed project would not substantially degrade the existing visual character of the site or its surroundings and any impacts would be less than significant.</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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As a result, the potential impacts will be less than significant.

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

Response:

Less Than Significant Impact. As the project is located in a moderately urbanized area, existing sources of light and glare typically come from vehicles traveling on Cottonwood Avenue, streetlights, and exterior lighting on surrounding development, as well as the reflection from windows and roofs on the surrounding development.

Construction Impacts

Project construction could result in temporary glare impacts as a result of construction equipment and materials present at the site. However, the construction of the project would be restricted to the City's permitted construction hours, per the MVMC Chapter 8.14.040, Miscellaneous Standards and Regulations. These construction hours allow work to be completed between the hours of seven a.m. to seven p.m. Monday through Friday, excluding holidays and from eight a.m. to four p.m. on Saturday, unless written approval is obtained from the city building official or city engineer. Although project construction could result in temporary glare impacts, the lighting will be minimal and will comply with City construction hours. Therefore, no adverse light or glare impacts to adjacent properties would result from temporary construction activities and impacts would be less than significant. *As a result, the potential impacts will be less than significant.*

Operational Impacts

Project operations would create new light sources from interior and exterior illumination associated with building materials, windows, exterior lighting, and security lighting. Interior and exterior lighting would conform to the California Green (CALGreen) Building Standards Code and Moreno Valley Municipal Code Article VI, Applications for Lighting, Chapter 9.16.280, General Requirements. All outdoor lighting would be automatic and programmable to turn on at certain times as necessary as well as adjustable to dim the light intensity between 40 percent and 80 percent to meet the efficiency requirements of California's Building Energy Efficiency Standards (Title 24, Parts 6 and 11). In addition, all proposed developments must comply with MVMC Chapter 9.10.110 - Light and Glare, which includes light trespass onto abutting residential properties, shielding, direction, and type.

Although the project would increase light and glare in the surrounding area, light and glare produced onsite would be similar to that of the surrounding development. Adherence to State and local standards and regulations will reduce impacts to a less than significant.

As a result, the potential impacts will be less than significant.

Sources:

1. Moreno Valley General Plan, adopted July 11, 2006
 - Chapter 2 – Community Development Element – Section 2.3 – Community Design
 - Chapter 2 – Community Development Element – Section 2.10– Community Design
 - Chapter 7 – Conservation Element – Section 7.8 – Scenic Resources; and Figure 7-2 Major Scenic Resources.
2. Moreno Valley General Plan 2040
 - Chapter 2 – Land Use and Community Character
 - Chapter 10- Open Space & Resource Conservation
3. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006
 - Section 5.11 – Aesthetics

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>4. Title 9 – Planning and Zoning of Moreno Valley Municipal Code.</p> <p>5. Section 9.10.110 – Light and Glare of the Moreno Valley Municipal Code.</p> <p>6. Section 8.14.040 – Miscellaneous Standards and Regulations of the Moreno Valley Municipal Code.</p> <p>7. Section 9.16.280 – General Requirements of the Moreno Valley Municipal Code.</p> <p>8. California Department of Transportation. Official designated scenic highways. https://dot.ca.gov/programs/environmental-analysis/scenic-highways California Department of Water Resources. SGMA Basin Prioritization Dashboard. https://gis.water.ca.gov/app/bp-dashboard/final/</p> <p>California Code of Regulations, Title 24, Part 11- California Green Building Standards Code</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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.</p> <p>Would the project:</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. According to the California Department of Conservation Farmland Mapping and Monitoring Program and California Farmland Finder Web Map, the proposed project site is not within an area identified as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance. The project is within the “Other Land” designation zone. The implementation of the proposed project would not involve the conversion of any Prime Farmland unique farmland, or farmland of statewide importance to an urban use.</p> <p><i>As a result, no impacts will occur.</i></p>				
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. The project site is currently zoned for residential development and there are no agricultural uses located within the site that would be affected by the project’s implementation. According to the California Department of Conservation Division of Land Resources Protection, the project is not subject to a Williamson Act Contract.</p> <p><i>As a result, no impact will occur.</i></p>				
<p>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))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. There are no forest lands or timber lands located within or adjacent to the proposed project site. Additionally, the current zoning designation, along with the proposed zone change to Residential R20, does not permit forest land or timber land uses. Therefore, no significant impacts to forest or timber resources will occur as a result of this project.</p> <p><i>As a result, no impacts will occur.</i></p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. There are no forest lands located within or adjacent to the project site. The proposed use will be restricted to the site and will not affect any land under the jurisdiction of the Bureau of Land Management (BLM). Therefore, no loss or conversion of forest land to urban uses will result from the proposed project's implementation.</p> <p><i>As a result, no impact will occur.</i></p>				
e) Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. The proposed project would not involve the disruption or damage of the existing environment that would result in a loss of farmland to non-agricultural use or conversion of forest land to non-forest use because there are no agricultural uses or protected forest lands within or adjacent to the proposed project site. The farmland or forest area conversion impacts will result from the proposed project implementation.</p> <p><i>As a result, no impact will occur.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006. <ul style="list-style-type: none"> • Chapter 7– Conservation Element – Section 7.7 – Agricultural Resources 2. Moreno Valley 2040 General Plan – Chapter 6 – Safety 3. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006 <ul style="list-style-type: none"> • Section 5.8 – Agricultural Resources; and Figure 5.8-1 – Important Farmlands. 4. California Department of Conservation, Division of Land Resource Protection, Farmland Mapping, and Monitoring Program. California Important Farmland Finder. 5. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code. 				

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

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:**

The project site falls under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and is located in the South Coast Air Basin (SCAB). The Air Quality Management Plan (AQMP) provides a program for obtaining attainment status for key monitored air pollution standards, based on existing and future air pollution emissions resulting from employment and residential growth projections. The Air Quality Management Plan (AQMP) is developed using input from various agencies' General Plans and other projections for population and employment growth. Emissions with regional effects during project construction, calculated with the California Emissions Estimator Model (CalEEMod); Version 2022.1.1.37, would not exceed criteria pollutant thresholds established by the SCAQMD, as detailed in Appendix A - *Air Quality/Greenhouse Gas Study for Cottonwood Apartments, prepared by Elevated Entitlements, February 2026.*

The proposed project is expected to have a minimal impact on the air quality of the area and would produce relatively few emissions during construction and negligible emissions during operation. Therefore, impacts are considered less than significant. Table 1, Table 2, and Table 3 present the regional air quality significance thresholds and results of the modeled emissions for the project.

**TABLE 1
Project's Contribution to Criteria Pollutants in the South Coast Air Basin**

EMISSIONS SOURCE	ROG POUNDS/DAY	NOx POUNDS/DAY	CO POUNDS/DAY	SOx POUNDS/DAY	PM10 POUNDS/DAY	PM2.5 POUNDS/DAY
Project Emissions ¹	8.85	9.24	22.48	0.027	1.94	0.79
Total Emissions in Air Basin ²	834,000	694,000	3,692,000	28,000	334,400	118,000
Project's Percent of Air Emissions	0.0011	0.0013	0.0006	0.0001	0.0006	0.0007
Significant Impact	No	No	No	No	No	No

Notes:

1 From the project's total operational emissions.

2 AQMD Clean Air Plans-Summary of Emissions by Major Source Category: 2018 Base Year

**Table 2
Estimated Daily Construction Emissions (Daily, Unmitigated)
LBS/Day (unless otherwise shown)**

EMISSION SOURCE	ROG	NOx	CO	SOx	PM10	PM2.5
SCAQMD Significance Thresholds	75	100	550	150	150	55
2027 Project Construction Emissions	0.32	2.57	3.72	0.006	0.66	0.32
2028 Project Construction Emissions	3.84	5.81	11.26	0.016	1.22	0.41
Total Project Construction Emissions	4.16	8.38	14.98	0.022	1.88	0.73
Significant?	No	No	No	No	No	No

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

TABLE 3
Estimated Daily Operational Emissions (Daily, Unmitigated)
LBS/Day (unless otherwise shown)

EMISSION SOURCE	ROG	NOx	CO	SOx	PM10	PM2.5
SCAQMD Significance Thresholds	55	55	550	150	150	55
Project Operational Emissions	-	-	-	-	-	-
Mobile	0.00	0.00	0.00	0.00	0.00	0.00
Area	4.65	0.07	7.17	<0.005	<0.005	<0.005
Energy	0.05	0.79	0.34	0.06	0.06	0.06
Water	-	-	-	-	-	-
Waste	-	-	-	-	-	-
Refrig.	-	-	-	-	-	-
Total Project Operational Emissions	4.69	0.86	7.50	0.005	0.06	0.06
<i>Significant?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

a) Conflict with or obstruct implementation of the applicable air quality plan?

Response:

Less Than Significant Impact. The primary way of determining consistency with the Air Quality Management Plan's (AQMP's) assumptions is determining consistency with the applicable General Plan to ensure that the Project's population density and land use are consistent with the growth assumptions used in the AQMPs for the air basin.

The Project is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD), since the Project is located within the South Coast Air Basin (Basin). As required by California law, a City's General Plan contains a Land Use Element that details the types and quantities of land uses that the City estimates will be needed for future growth, and that designate locations for land uses to regulate growth. Existing and future pollutant emissions computed in the AQMPs are based on land uses from area general plans. AQMPs detail the control measures and emission reductions required for reaching attainment of the air standards. The proposed project is located within the City of Moreno Valley, which adheres to the 2006 General Plan and the upcoming 2040 General Plan. According to the City of Moreno Valley's 2006 General Plan, the proposed project includes a Zone Change from Residential 10 (R10) to Residential 20 (R20) and a corresponding General Plan Amendment to change the land use designation from R10 to R20. However, if the City of Moreno Valley 2040 General Plan is approved prior to Project approval, the Project would not require the proposed Project to conduct a zone change, as the Project's underlying zoning is consistent with the 2040 General Plan. As the project is consistent with the City's General Plan, it is also consistent with the residential development patterns and emissions assumptions of the AQMP and would therefore not conflict with or obstruct implementation of any air quality management plan.

In addition, as shown in Table 1 above, emissions from construction and operations of the proposed project would be below SCAQMD air quality significance thresholds for all pollutants. Based on this, the proposed project would not be expected to conflict with or obstruct implementation of the AQMP. Given the negligible contribution of project emissions relative to regional totals, the project would not conflict with or obstruct the SCAQMD Air Quality Management Plan or other applicable attainment plans. Therefore, impacts would be less than significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>As a result, no mitigation is required and the impacts would be less than significant.</i>				
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. SCAQMD has established daily emissions thresholds for construction and operation of a proposed project in the SCAB. The emissions thresholds were established based on the attainment status of the SCAB with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health within an adequate margin of safety, these emissions thresholds are regarded as conservative and would overstate an individual project's contribution to health risks.</p> <p>As shown in Table 1, emissions from construction and operations of the proposed project would be below SCAQMD air quality significance thresholds for all pollutants. Specifically, the proposed project would not exceed SCAQMD significance thresholds for ozone precursor pollutants, Volatile Organic Compounds (VOC) and Nitrogen Oxides (Nox), as well as PM10 and PM2.5 for which the SCAB is in non-attainment. Projects in the Basin with construction or operation related emissions that exceed any of their respective emission thresholds would be considered significant under SCAQMD guidelines. These thresholds, which SCAQMD developed and that apply throughout the Basin, apply as both project and cumulative thresholds. If a project exceeds these standards, it is considered to have a project-specific and cumulative impact. As the project's emissions would not exceed SCAQMD thresholds, the project would have a less than significant impact.</p> <p><i>Therefore, impacts would be less than significant, and no mitigation is required.</i></p>				
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The California Air Quality Management District's recommend that all air quality analyses include an assessment of both construction and operational impacts on the air quality of nearby sensitive receptors. Sensitive receptors are defined as populations that are more susceptible to the effects of pollution than the population at large. The SCAQMD identifies the following as sensitive receptors: residences, schools, daycare centers, playgrounds, and medical facilities.</p> <p>Although the Project site is adjacent to residential uses, no SCAQMD criteria pollutant thresholds or GHG emissions thresholds would be exceeded during either project construction or operations. In addition, the Project does not exceed the LSTs, based on the estimates of the emissions associated with project construction and operation. The only potential impacts to the surrounding sensitive receptors would be dust pollutants during the construction phase. However, due to the temporary nature of construction, impacts from dust pollutants would not be significant. Overall, the project would not expose any sensitive receptors to substantial pollutant concentrations and a less than significant impact would occur. Therefore, the proposed Project would not be expected to create any significant localized air quality impacts during the construction or operation period.</p> <p><i>Therefore, given that no significant air quality impacts are anticipated, impacts on sensitive receptors would be less than significant, and no mitigation is required.</i></p>				
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Response:				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Less Than Significant Impact California Environmental Quality Act (CEQA) requires that an analysis of potential odor impacts be conducted in the following two situations:</p> <ul style="list-style-type: none"> • Generators – projects that would potentially generate odorous emissions proposed to be located near existing sensitive receptors or other land uses where people may congregate. • Receivers – residential or other sensitive receptor projects or other projects built for the intent of attracting people located near existing odor sources. <p>The intensity of an odor source’s operations and its proximity to sensitive receptors influences the potential significance of odor emissions. During construction, diesel equipment operating at the site may generate some nuisance odors. Standard construction requirements will minimize the odor impacts from construction, resulting in minimal, temporary and short-term odor emissions, and thus is considered less than significant.</p> <p>Land uses associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations. These land uses are not proposed for this project. Overall, odor impacts would be less than significant.</p> <p><i>As such, impacts would be less than significant, and no mitigation is required.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006. <ul style="list-style-type: none"> • Chapter 5– Circulation Element and Chapter 6 – Safety Element, Section 6.6 – Air Quality 2. Moreno Valley 2040 General Plan <ul style="list-style-type: none"> • Chapter 8– Environmental Justice 2. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006 <ul style="list-style-type: none"> • Section – Air Quality; Figure 5.3-1 – South Coast Air Basin. 3. California Air Pollution Control Officers Association. California Emissions Estimator Model Version 2022.1.126 4. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code. 5. South Coast Air Quality Management District. (2017). <i>Air Quality Management Plan</i>. 6. Appendix A- Air Quality/Greenhouse Gas Study for Cottonwood Apartments, prepared by Elevated Entitlements, January 2025 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant with Mitigation Incorporated. The implementation of the proposed project does not present a significant adverse effect, either directly or through habitat modifications, on 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS). As discussed in the Biological Resources Assessment (BRA), the proposed project does contain habitat suitable for burrowing owl (BUOW). However, protocol-level presence/absence surveys that were conducted in June of 2021 indicate that no BUOW individuals or signs of presence were observed. Similarly, no BUOW signs or individuals were observed during the BRA survey conducted by Jacobs in June of 2021. Additionally, Elevated Entitlements conducted an addendum to the Jacobs biological report on May 30, 2024, and during that survey, no signs of BUOW were observed. Therefore, BUOW are considered absent from the project area at the time of surveys, and the project is not likely to impact this species. However, to ensure no impacts occur, the following measure (Mitigation Measure MM-BIO-1) is required.</p> <p>BUOW is a state and federal Species of Special concern (SSC) and is also protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game code (FGC #3513 & #3503.5). Impacts to BUOW can generally avoided by avoiding occupied burrows and conducting work outside of their nesting season. However, if all work cannot be conducted outside of nesting season and occupied burrows cannot be avoided, Mitigation Measure MM-BIO-2 and Mitigation Measure MM-BIO-3 shall be required.</p> <p>This measure will ensure that any BUOW that may occupy the site between the date of the BRA survey and the start of construction. Given that no other state- and/or federally-listed threatened or endangered species, or other sensitive species are anticipated to occur on-site based on the BRA results, the proposed project is expected to have a less than significant potential to substantial affect any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS with implementation of Mitigation Measures MM-BIO-1 and MM-BIO-2.</p> <p>Mitigation Measures:</p> <p>MM-BIO-1: If construction occurs between February 1 and August 31, a qualified biologist must conduct a birdnesting bird survey no more than three days prior to the start of construction to determine if nesting is occurring. If occupied nests are found, they shall not be disturbed unless the qualified biologist verifies through non-invasive methods that either (a) the adult birds have not begun egg-laying and incubation; or (b) the juveniles from the occupied nests are capable of independent survival.</p> <p>If the biologist is not able to verify one of the above conditions, then no disturbance shall occur within a distance specified by the qualified biologist for each nest or nesting site. The qualified biologist will determine the appropriate distance in consultation with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service.</p> <p>Pre-construction surveys for BUOW shall be conducted no more than three (3) days prior to commencement of project-related ground disturbance to verify that BUOW remains absent from the project Area.</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>MM-BIO-2: If all work cannot be conducted outside of nesting season, a project specific BUOW protection and/or passive relocation plan can be prepared to determine suitable buffers and/or artificial burrow construction locations. Regardless of survey results and conclusions given herein, BUOW are protected by applicable state and federal laws. As such, if a BUOW is found on-site at the time of construction, all activities likely to affect the animal(s) shall cease immediately and regulatory agencies shall be contacted to determine appropriate management actions.</p> <p>MM-BIO-3: If all work cannot be conducted outside of nesting season, a qualified Avian Biologist shall conduct pre-construction nesting bird surveys prior to Project-related disturbance to suitable nesting areas to identify any active nests. If no active nests are found, no further action would be required. If an active nest is found, the biologist shall set appropriate no-work buffers around the nest which would be based upon the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance. The nest(s) and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone shall be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.</p> <p><i>With the application of necessary requirements and conditions, the potential impacts of the project would be less than significant with mitigations incorporated.</i></p>				
<p>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. Implementation of the proposed project will not have an adverse effect on any riparian habitat or sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS. According to the Biological Resources Assessment (BRA) conducted for the project, the site is heavily disturbed, consisting primarily of disked, bare ground, and no longer supports native habitat. Vegetation on-site is sparse and dominated by non-native, invasive species, including Field Bindweed (<i>Convolvulus arvensis</i>) and non-native grasses, such as, Slim Oat (<i>Avena barbata</i>), Brome Grasses (<i>Bromus</i> spp.), Bermuda Grass (<i>Cynodon dactylon</i>), Italian Ryegrass (<i>Festuca perennis</i>), and Foxtail Barley (<i>Hordeum murinum</i>).</p> <p>The nearest designated Critical Habitat unit is located approximately 2.5 miles north of the project site and is part of the San Timoteo Creek Unit of USFWS designated Critical Habitat for the federally endangered Southwestern Willow Flycatcher (<i>Empidonax traillii extimus</i>). However, no portion of the project site is within or adjacent this Critical Habitat, or any other Critical Habitat. According to the California Natural Diversity Database (CNDDDB), the closest sensitive habitat is the Southern Sycamore Alder Riparian Woodland, located approximately 3.8 miles north of the project site within Reche Canyon.</p> <p>As stated, the project site does not contain any sensitive habitats, including any USFWS-designated Critical Habitat for any federally listed species. Therefore, the project will not result in the loss or adverse modification of Critical Habitat. No Riparian/Riverine areas, natural or man-made streams, or other aquatic or riparian habitats are present on-site. Based on the field survey conducted by Jacobs, Elevated Entitlements, and the BRA, the proposed project is expected to have less than significant potential to impact riparian habitats or other sensitive communities.</p> <p><i>As such, impacts on the project would be less than significant.</i></p>				
<p>c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.)</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
through direct removal, filling, hydrological interruption, or other means?				
<p>Response:</p> <p>No Impact. The project would not have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (CWA), including, but not limited to, marshes, vernal pools, and coastal wetlands. This is because the project is not located within an identified protected wetland. The Jurisdictional Delineation conducted for the project concluded that there are no wetlands or non-wetland waters of the U.S. (WOTUS), nor waters of the State, that are potentially subject to regulation by the U.S. Army Corps of Engineers (USACE) under Section 404 of the CWA, the Regional Water Quality Control Board (RWQCB) under Section 401 of the CWA and/or Porter Cologne Water Quality Control Act, or the California Department of Fish and Wildlife (CDFW) under Section 1602 of the California Fish and Game Code.</p> <p><i>As a result, no impacts are anticipated.</i></p>				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with an established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant with Mitigation Incorporated. Based on the field survey of the project site on May 28, 2024, the proposed project will not substantially interfere with the movement of any native resident or migratory species or interfere with established native or migratory wildlife corridors or impede the use of native nursery sites. The State protects all migratory and nesting native birds. The only wildlife species observed or otherwise detected during the reconnaissance-level survey were birds, including the American Kestrel (<i>Falco sparverius</i>), House Sparrow (<i>Passer domesticus</i>), Cassin's Kingbird (<i>Tyrannus vociferans</i>), and Mourning Dove (<i>Zenaida macroura</i>). Additionally, Elevated Entitlements on May 30th, 2024, found House Finch (<i>Haemorhous Mexicanus</i>), Common Raven (<i>Corvus Corax</i>), Urasian Collared-dove (<i>Streptopelia Decaocto</i>), northern mockingbird (<i>Mimus Polyglottos</i>), European starling (<i>Sturnus Vulgaris</i>), and Black Phoebe (<i>Sayornis Nigricans</i>). Therefore, the project area may include locations that serve as nesting locations for native birds. To prevent any impacts to nesting birds, in accordance with the Migratory Bird Treaty Act (MBTA) and California Fish and Game Commission (FGC) regulations, Mitigation Measure MM-BIO-1 will be implemented, as discussed under Issue 4(a).</p> <p><i>With application of necessary requirements and conditions, the potential impacts of the project would be less than significant with mitigations incorporated.</i></p>				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The Moreno Valley Municipal Code addresses tree removal in all land uses, projects, and districts requiring City approval. Under Title 9, Chapter 9.17 of the Moreno Valley Municipal Code, the City has identified two (2) tree species as "heritage trees." Specifically, Chapter 9.17.030, Landscape and Irrigation Design Standards, defines heritage trees as any tree which "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." It also includes any tree that "is fifteen (15) inch diameter measured twenty-four (24) inches above ground level or that has reached a height of fifteen (15) feet or greater." Under Chapter 9.17.030 of the Municipal Code, the removal of heritage trees requires review by the Ecological Historical Preservation Board.</p> <p>Based on the Biological Resources Assessment (BRA), no heritage trees are present on-site. The vegetation on-site primarily ruderal and dominated by invasive and non-native species. Observed</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>species include Italian Rye (<i>Festuca perennis</i>), Jimsonweed (<i>Datura wrightii</i>), Brome Grass (<i>Bromus</i> spp), and others. A complete list of plant species is shown in Appendix A of the BRA, JD, and MSHCP Report.</p> <p>The project complies with Chapter 9.17.030 of the Moreno Valley Municipal Code. Therefore, the development of the proposed project would have a less than significant potential to conflict with any local policies or ordinances protecting biological resources. Impacts to biological resources are addressed above under Issues 4(a-d). Past site disturbance has eliminated any potential for protected biological resources to exist on-site.</p> <p><i>As such, impacts on the project would be less than significant.</i></p>				
<p>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?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant with Mitigation Incorporated. The project site is located within the Western Riverside County Multiple Species Habitat Conservation Plan's (MSHCP) Reche Canyon/Badlands Area Plan. According to the Western Riverside County Regional Conservation Authority's online MSHCP Information Tool query, the project site is within the San Timoteo Habitat Management Unit (HMU), but is not mapped within or adjacent a Criteria Cell or Cell Group. Therefore, it is not targeted for conservation. Furthermore, the project site is not mapped within any required survey areas for amphibians, mammals, invertebrates, Narrow Endemic Plants Species, or other Criteria Area Species. However, BUOW surveys are required within the project area.</p> <p>Therefore, in addition to the BRA survey, a BUOW habitat suitability assessment survey was conducted for the project area in accordance with the MSHCP requirements. As discussed under Issue 4(a), the proposed project will be required to implement Mitigation Measures MM-BIO-1, MM-BIO-2, and MM-BIO-3 to ensure that this species is protected prior to construction should the site become occupied with this species between the time of the survey and construction. These measures, along with the BUOW habitat suitability assessment survey meet the MSHCP requirements, and no significant impacts are anticipated to occur to this species as a result of project implementation.</p> <p>As stated above, the BRA concluded that the project is consistent with the MSHCP policies found in Section 6 of the MSHCP, which include Riparian/Riverine Areas/Vernal Pools, Narrow Endemic Plant Species, Criteria Area Species, Urban/Wildlands Interface, and Surveys for Special Status Species (BUOW). The project site is within the MSHCP boundary, but is not within or adjacent to any MSHCP Criteria Cells or Cell Groups. Therefore, implementation of the MSHCP Section 6.1.4 Guidelines Pertaining to the Urban/Wildlands Interface is not required. The project proponent is required to pay the MSHCP fees and restrict all project related impacts to existing right-of-way and/or other areas outside of Conserved Lands.</p> <p>No conservation or avoidance measures are expected, and the project, as described, is consistent with the Reche Canyon/Badlands Area Plan conservation criteria and overall conservation goals and objectives set forth in the MSHCP. Therefore, with the implementation Mitigation Measures MM-BIO-1, MM-BIO-2, and MM-BIO-3, the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or another approved local, regional, or state habitat conservation plan. Impacts would be reduced to less than significant.</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><u>Mitigation Measures:</u></p> <p>MM-BIO-1: If construction occurs between February 1 and August 31, a qualified biologist must conduct a birdnesting bird survey no more than three days prior to the start of construction to determine if nesting is occurring. If occupied nests are found, they shall not be disturbed unless the qualified biologist verifies through non-invasive methods that either (a) the adult birds have not begun egg-laying and incubation; or (b) the juveniles from the occupied nests are capable of independent survival.</p> <p>If the biologist is not able to verify one of the above conditions, then no disturbance shall occur within a distance specified by the qualified biologist for each nest or nesting site. The qualified biologist will determine the appropriate distance in consultation with the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service.</p> <p>Pre-construction surveys for BUOW shall be conducted no more than three (3) days prior to commencement of project-related ground disturbance to verify that BUOW remains absent from the project Area.</p> <p>MM-BIO-2: If all work cannot be conducted outside of nesting season, a project specific BUOW protection and/or passive relocation plan can be prepared to determine suitable buffers and/or artificial burrow construction locations. Regardless of survey results and conclusions given herein, BUOW are protected by applicable state and federal laws. As such, if a BUOW is found on-site at the time of construction, all activities likely to affect the animal(s) shall cease immediately and regulatory agencies shall be contacted to determine appropriate management actions.</p> <p>MM-BIO-3: If all work cannot be conducted outside of nesting season, a qualified Avian Biologist shall conduct pre-construction nesting bird surveys prior to Project-related disturbance to suitable nesting areas to identify any active nests. If no active nests are found, no further action would be required. If an active nest is found, the biologist shall set appropriate no-work buffers around the nest which would be based upon the nesting species, its sensitivity to disturbance, nesting stage and expected types, intensity and duration of disturbance. The nest(s) and buffer zones shall be field checked weekly by a qualified biological monitor. The approved no-work buffer zone should be clearly marked in the field, within which no disturbance activity shall commence until the qualified biologist has determined the young birds have successfully fledged and the nest is inactive.</p> <p><i>With application of necessary requirements and conditions, the potential impacts of the Project would be less than significant with mitigations incorporated.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code, Section 9.17.030 G - Heritage Trees 2. Appendix B1 – Elevated Entitlements Biological Report Amendment, May 30, 2024 3. Appendix B2 – Cottonwood Village Development Project: Biological Resources Assessment, Jurisdictional Delineation Report, and MSHCP Consistency Analysis” prepared by Jacobs Engineering Group, Inc., June 2021 4. California Natural Diversity Database (CNDDDB). 2021. RareFind 5 [Internet]. California Department of Fish and Wildlife, Version 5.2.14. Available at: https://wildlife.ca.gov/Data/CNDDDB/Maps-and-Data; accessed 2 June 2021. 5. U.S. Army Corps of Engineers. (n.d.). <i>Clean Water Act – Section 404</i>. 33 U.S.C. §1344. 6. U.S. Environmental Protection Agency. (n.d.). <i>Clean Water Act – Section 401</i>. 33 U.S.C. §1341 7. Section 1602 of the California Fish and Game Code 8. U.S. Fish and Wildlife Service. (n.d.). <i>The Migratory Bird Treaty Act</i>, 16 U.S.C. §§ 703–712.) California Fish and Game code (FGC 3513 & 3503.5) 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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V. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Response:

No Impact. CEQA guidelines state that the term “historical resources” applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency (Title 14 CCR §15064.5(a)(1)-(3)). Regarding the proper criteria for the evaluation of historical significance, CEQA guidelines mandate that “generally a resource shall be considered by the lead agency to be ‘historically significant’ if the resource meets the criteria for listing on the California Register of Historical Resources” (Title 14 CCR §15064.5(a)(3)). A resource may be listed in the California Register if it meets any of the following criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))

A detailed cultural resources survey (CRS) was prepared for the project site by CRM TECH in September 2021, as shown in Appendix C2. The CRS determined the project area had not been previously surveyed for cultural resources, and no cultural resources were previously recorded within or adjacent to the project boundaries. Records indicate the following three cultural sites have been recorded within a half-mile radius of the project site:

- Site 33-007279 - D.C. Hield House (1896)
- Site 33-007280 - Rosa More House (circa 1880s)
- Site 33-028824 - Slab, utility pole, and glass bottle fragment

All of these sites are from the historic period and are not of pre-historic or archaeological origin (i.e., they are not related to Native American activities). Two of these sites were buildings, specifically single-family residences dating to the late 19th century, while the third represents structural remains. None of the sites were found in the immediate vicinity of the project area and archival information indicates there were no structures on the project site which were historically used for agriculture.

According to the CRS, no potential historical resources were previously recorded within or adjacent to the project Area, and none were encountered during the field survey. In addition, the Sacred Lands File indicate no properties of Native American traditional cultural value in the project vicinity, and no notable cultural features were known to be present in the project Area throughout the historic period. Based on these findings, and in light of the criteria listed above, the CRS concluded that no “historical resources” exist within or adjacent to the project Area. Therefore, based on available evidence, the proposed project will not cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.

Based on the survey results and available evidence, the proposed project would result in no impact to historical resources.

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

Response:

Less Than Significant with Mitigation Incorporated. A detailed CRS was prepared for the project site by CRM TECH in September 2021, as shown in Appendix C2. The purpose of the study was to determine whether the proposed project would cause substantial adverse changes to any “historical resources,” as defined by CEQA, that may exist in or near the project area. For the purposes of this determination, the criteria for significant impacts to historical resources outlined in Threshold 5.a above also apply to archaeological or Native American resources.

In May 2021, CRM TECH notified the nearby Soboba Band of Luiseño Indians of the upcoming archaeological field survey and invited tribal participation. In August 2021, CRM TECH conducted a field survey of the project site which was accompanied by a tribal monitor from the Soboba Band of Luiseño Indians. At that time, the Soboba Band expressed no specific concerns regarding the potential for cultural resources to be present within the project area.

The CRS determined the project area had not been previously surveyed for cultural resources, and no resources were previously recorded within or adjacent to the project boundaries. As described above, records indicate three cultural sites have been recorded within a half-mile radius of the project site, but all are from the historic period and are not of pre-historic or archaeological origin (i.e., they are not related to Native American activities).

The CRS recommended that if buried cultural materials are encountered during any earth-moving operations associated with the project, all work within 50 feet of the discovery shall be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds. In addition, the City has identified specific required mitigation actions to protect cultural resources, which have been incorporated into **Mitigation Measures MM-CUL-1 through MM-CUL-9**. The proposed **Mitigation Measures MM-CUL-1 through MM-CUL-9** address the requested mitigation measures provided by Consulting Tribes, including the Pechanga Band of Mission Indians, the Yuhaaviatam of San Manuel Nation (YSMN), as stated in Appendix L - Yuhaaviatam of San Manuel Nation AB 52 Consultation Letter, July 7, 2025, as well as the requested mitigation measures provided by the Morongo Band of Mission Indians, as stated in Appendix M - Morongo Band of Mission Indians AB 52/SB 18 Consultation Letter, August 8, 2025. With the implementation of these measures, potential impacts related to archaeological resources pursuant to CEQA Guidelines Section 15064.5 that may be inadvertently encountered during project grading would be reduced to a less than significant level.

Mitigation Measures

MM-CUL-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. The project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during project construction. The project Archaeologist, in consultation with the Consulting Tribes, the contractor, and the City, shall develop a CRMP as defined in MM-CUL-3. The project archaeologist shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The archaeological monitor shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological resources are unearthed.

MM-CUL-2 Native American Monitoring. Prior to the issuance of a grading permit, the Developer shall secure agreements with the Consulting Tribes, Pechanga Band of Mission Indians, 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 resources are unearthed. The Native American Monitor(s) shall attend the

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>pre-grading meeting with the project Archaeologist, City, the construction manager and any contractors and will conduct the Tribal Perspective of the mandatory Cultural Resources Worker Sensitivity Training to those in attendance.</p> <p>MM-CUL-3 Cultural Resource Monitoring Plan (CRMP). The project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a CRMP in consultation pursuant to the definition in AB52 to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting Tribe is defined as a Tribe that initiated the AB52 tribal consultation process for the project, has not opted out of the AB52 consultation process, and has completed AB52 consultation with the City as provided for in California Public Resources Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include:</p> <ul style="list-style-type: none"> a. Project description and location. b. Project grading and development scheduling. c. Roles and responsibilities of individuals on the Project. d. The pre-grading meeting and Cultural Resources Worker Sensitivity Training details. e. The protocols and stipulations that the contractor, City, Consulting Tribe (s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation. f. The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items. g. Contact information of relevant individuals for the Project. <p>MM-CUL-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:</p> <ul style="list-style-type: none"> a. One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Moreno Valley Planning Department: <ul style="list-style-type: none"> i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place they were found with no development affecting the integrity of the resources. ii. Onsite reburial of the discovered items as detailed in the treatment plan required pursuant to Mitigation Measure CR-1. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed. No recordation of sacred items is permitted without the written consent of all Consulting Native American Tribal Governments as defined in 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. <p>MM-CUL-5. The City shall verify that the following note is included on the Grading Plan:</p> <p>"If any suspected archaeological resources are discovered during ground-disturbing activities and the Project Archaeologist or Native American Tribal Representatives are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Tribal Representatives to the site to assess the significance of the find."</p> <p>MM-CUL-6 Inadvertent Finds. If potential historic or cultural resources are uncovered during</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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, and shall be submitted to the City for their review and approval prior to implementation of the said plan.</p> <p>MM-CUL-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 consulting Tribe(s).</p> <p>MM-CUL-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).</p> <p>MM-CUL-9 Archeology Report – Phase III and IV. If required for the Project, prior to final inspection, the developer/permit holder shall prompt the Project Archeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the South Costal Information Center (SCIC) at the San Diego State University (SDSU) and one (1) copy shall be submitted to each of the Consulting Tribe(s) Cultural Resources Department(s).</p> <p><i>With the incorporation of MM-CUL-1 to MM-CUL-9, which address all mitigation identified by the City, as well as all mitigation measures provided by the consulting tribes, including the Pechanga Band of Mission Indians, the Yuhaaviatam of San Manuel Nation, and the Morongo Band of Mission Indians, potential impacts on archaeological and cultural resources will be less than significant.</i></p>				
c) Disturb any human remains, including those interred outside of formally dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Response:				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Less Than Significant with Mitigation Incorporated. If suspected human remains are found during grading, California Health and Safety Code Section 7050.5 requires the County Coroner to determine whether or not the remains are human. If the Coroner determines that the remains are or appear to be of Native American origin, the Native American Heritage Commission must be contacted.</p> <p>Pursuant to Public Resource Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within the period specified by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "most likely descendant" (MLD). The MLD shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Human remains from other ethnic/cultural groups with recognized historical associations to the project area shall also be subject to consultation between appropriate representatives from that group and the Community Development Director.</p> <p>A detailed CRS was prepared for the project site by CRM TECH in September 2021. The CRS determined the site did not contain any identified or visible Native American resources, but local tribal representatives indicate it is always possible to encounter previously unknown buried Native American remains during grading within their traditional tribal lands which includes the project area.</p> <p>It is possible that buried human remains may be encountered during construction given the proven prehistoric occupation of the region. As discussed in Section V b), Mitigation Measures MM-CUL-7 and MM-CUL-8 are required to reduce the potentially significant impact to previously unknown human remains that may be discovered during project grading to a less than significant level.</p> <p><i>With the implementation of the above mitigation measures, the potential impacts associated with the discovery of human remains during project construction would be reduced to a less than significant level.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> Appendix C1 Cultural Resource Assessment Update, Biocultural LLC August 2025 Appendix C2 Cultural Resources Survey Report, CRM Tech September 2021 Appendix L Yuhaaviatam of San Manuel Nation AB 52 Consultation Letter, July 7, 2025 Appendix M Morongo Band of Mission Indians AB 52/SB 18 Consultation Letter, August 8, 2025 Cultural Historical Resources Information System (CHRIS) Southern Central Coast Information Center, California State University, Fullerton Moreno Valley General Plan, adopted July 11, 2006 <ul style="list-style-type: none"> Chapter 7 – Conservation Element – Section 7.2 – Cultural and Historical Resources Moreno Valley 2040 General Plan <ul style="list-style-type: none"> Chapter 10- Open Space & Resource Conservation Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006 Title 14 CCR §15064.5(a)(1)-(3) Public Resource Code Section 5097.98 https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=5097.98.&lawCode=PRC Public Resources Code Section 21080.3.2(b)(1) of AB52 https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=21080.3.2.&lawCode=PRC Secretary of the Interior's Standards (36 CFR 61) https://www.law.cornell.edu/cfr/text/36/part-61 California Government Code 6254 (r) Exemptions from disclosure. https://california.public.law/codes/ca_gov%27t_code_section_6254 				
<p>VI. ENERGY – Would the project:</p>				
<p>a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Response:</p> <p>Less than Significant Impact.</p> <p>The construction nor operation of the project would result in wasteful, inefficient, or unnecessary consumption of energy resources. This conclusion is supported by the comprehensive analysis provided in the Energy Review Report for the project, prepared by MD Acoustics in February 2025, in Appendix D. Construction equipment used over the approximately 13-month construction phase would conform to CARB regulations and California emissions standards and is evidence of related fuel efficiencies. Construction of the proposed residential development would require the typical use of energy resources. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.</p> <p>The estimated electricity demand for the proposed project is approximately 1,413,490 kWh per year. This increase in electrical demand is insignificant to the County's 2022 residential sector demand. The proposed project energy demands in total would be comparable to other residential projects of similar scale and configuration. Therefore, the project facilities' energy demands and energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.</p> <p><i>Therefore, based on this analysis, the project is determined to have less than significant impacts regarding energy consumption.</i></p>				
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less than Significant Impact.</p> <p>The proposed project is located within the City of Moreno Valley, which adheres to the 2006 General Plan and the upcoming 2040 General Plan. According to the City of Moreno Valley's 2006 General Plan, the proposed project includes a Zone Change from Residential 10 (R10) to Residential 20 (R20) and a corresponding General Plan Amendment to change the land use designation from R10 to R20. However, if the City of Moreno Valley 2040 General Plan is approved prior to Project approval, the Project would not require the proposed Project to conduct a zone change, as the Project's underlying zoning is consistent with the 2040 General Plan</p> <p>The City of Moreno Valley's Park Conservation and Open Space (PCOS) Element, adopted as part of the General Plan on July 11, 2006, and the City of Moreno Valley's Open Space & Resource Conservation Element, which is part of the 2040 General Plan, outlines the City's commitment to sustainability and energy conservation. The proposed project is consistent with the land use designation in the General Plan and will comply with Title 24 Energy Efficiency Standards, the 2022 CALGreen Code, and other relevant local and state energy regulations.</p> <p>As the project aligns with the City's land use plans, it is expected that existing energy infrastructure and resources will adequately support the proposed development. The project has been designed to minimize energy consumption, avoid inefficient energy practices, and support California's broader renewable energy and greenhouse gas reduction goals. Importantly, the project would not require the development of new energy production or transmission infrastructure and does not conflict with the goals outlined in the Open Space and Resource Conservation (OSRC) Plan or any other applicable state or local renewable energy initiatives.</p> <p>CARB has adopted the Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants.</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Additionally, as required by California Code of Regulations Title 13, Motor Vehicles, section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than five minutes, thereby minimizing or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints. Compliance with these measures would result in a more efficient use of construction-related energy and would minimize or eliminate wasteful or unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption.</p> <p>Regarding federal transportation regulations, the project site is located in an already developed area. Access to/from the project site is from existing roads. These roads are already in place so the project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the ISTEA because SCAG is not planning for intermodal facilities in the project area.</p> <p>Project operation and site maintenance (including landscape maintenance) would result in the consumption of electricity and natural gas (provided by SCE). These facilities would comply with all applicable California Energy Efficiency Standards and 2022 CALGreen Standards.</p> <p><i>Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006 <ul style="list-style-type: none"> • Chapter 7 – Conservation Element – Section 7.6 – Energy Resources 2. Moreno Valley 2040 General Plan <ul style="list-style-type: none"> • Chapter 8 – Environmental Justice 3. Final Environmental Impact Report City of Moreno Valley General Plan certified July 11, 2006. 4. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code. 5. The California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) 6. California Code of Regulations. (2022). <i>California Green Building Standards Code (CALGreen Code), Title 24, Part 11.</i> 7. Appendix A - Air Quality/Greenhouse Gas Study for WJK Commercial, prepared by Elevated Entitlements, February 2026 8. Appendix D - Energy Letter Report, prepared by MD Acoustic February 2025 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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VII. GEOLOGY AND SOILS – Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to https://www.conservation.ca.gov/cgs/Documents/SP_042.pdf	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Response:

Less Than Significant Impact. A geotechnical report was prepared for the project site, and this report is included in Appendix E. The report is titled Geotechnical Engineering Report dated April 29, 2024. According to the California Department of Conservation’s Regional Geologic Maps, the subject site is not located within a State of California Alquist Priolo Earthquake Fault Zone. The closest mapped active fault that could affect the project site is the Claremont Fault, located within the San Jacinto Fault Zone, approximately four and a half miles to the east. Although no active faults traverse the project site, as a condition of issuing building and grading permits, the project would be required to comply with the requirements of the Alquist-Priolo Earthquake Fault Zoning Act, as well as with the current California Building Code (CBC), which includes specific design measures intended to maximize structural stability in the event of an earthquake. Construction of the project would also be required to comply with current seismic design parameters and all other recommendations outlined in the Geotechnical Engineering Report to ensure structural integrity in the event of an earthquake. *Therefore, the impacts are expected to be less than significant.*

The site has experienced past ground shaking from faults that traverse the region. Strong seismic shaking from nearby active faults is expected to produce strong seismic shaking during the design life of the proposed project. The site modified peak ground acceleration is estimated to be 0.867g. However, as a condition of issuing grading and building permits, the project would be required to comply with current CBC seismic design parameters and all other recommendations outlined in the Geotechnical Engineering Report. Compliance with these parameters would ensure that the proposed residential homes are designed and constructed to withstand expected seismic activity and associated potential hazards, thereby minimizing risk to the public and property. The project would be designed and developed in accordance with the CBC, standard engineering practices, and reviewed by the City Engineer.

Therefore, the impacts are expected to be less than significant.

ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Response:

Less Than Significant Impact. The site has been subjected to past ground shaking by faults that traverse through the region. Strong seismic shaking from nearby active faults is expected to occur during the design life of the proposed project. The site’s modified peak ground acceleration is estimated to be 0.867g. However, as a condition of issuance of grading and building permits, the project would be required to comply with current CBC seismic design parameters and all other recommendations outlined in the Geotechnical Engineering Report. Compliance with these parameters would require that the proposed residential homes be designed and constructed to withstand expected seismic activity and associated potential hazards, thereby minimizing risk to the public and property. The project would be designed and developed in accordance with the CBC, standard engineering practices, and reviewed in conjunction with the City Engineer.

Therefore, the impacts are expected to be less than significant.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The Geotechnical Engineering Report found that the project site has very low susceptibility to liquefaction due to the dense nature of the underlying soil, based on site exploration. The depth to groundwater identified in the Geotechnical Engineering Report is 19 and 25 feet below ground surface (bgs). Additionally, the project site is not located in an area of high liquefaction susceptibility, according to the Honker Bay Quadrangle Map from the United States Geological Services (USGS). However, adherence to current California Building Code Seismic Design Standards would further ensure a less than significant impact due to liquefaction.</p> <p><i>Therefore, the impacts are expected to be less than significant.</i></p>				
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impacts. The project site is located in a generally level area and is not in close proximity to hillsides, foothills, or mountains that could potentially slide during a ground-disturbing event, such as an earthquake. According to the U.S. Landslide Inventory and Susceptibility Map, the project site is not within any Landslide Susceptibility Zones.</p> <p><i>As a result, no impacts would occur.</i></p>				
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. Proposed construction activities would include clearing the site of debris and/or vegetation, soil excavation, grading, asphalt paving, residential home construction, and landscaping. These activities would disturb site soil, exposing it to the erosive effects of wind and water. However, all construction activities related to the proposed project would be subject to the implementation of Best Management Practices (BMPs) for erosion control, as required under NPDES regulations pursuant to the federal Clean Water Act (CWA). NPDES requirements for construction projects of one acre or more in area are set forth in the Construction General Permit issued by the State Water Resources Control Board (State Water Board Order No. 2009-0009-DWQ). Furthermore, the project's land clearing, grading, and construction activities would be required to comply with SCAQMD Rules 403 and 403.2, which regulate fugitive dust emissions, thus minimizing wind erosion from such ground-disturbing activities. Therefore, the proposed project would not generate substantial erosion.</p> <p><i>Therefore, the impacts are expected to be less than significant.</i></p>				
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. Refer to Discussion VII.a) iii and VII.a) iv, above. The proposed project is not located on a geologic unit or soil that has been identified as unstable or having the potential to result in landslide, lateral spreading, subsidence, liquefaction, or collapse based on the project location.</p> <p><i>Therefore, the impacts are expected to be less than significant.</i></p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The project site is not located in an area identified by the County Building and Safety Geologist as having the potential for expansive soils, as defined in Table 18-1-B of the Uniform Building Code (1994), which could create substantial direct or indirect risks to life or property.</p> <p>In addition, expansion index testing was performed on selected bulk samples of the on-site soils, in accordance with the current version of Test Method ASTM D4829-07. The results, displayed in the expansion index table from the Geotechnical report, indicate an expansion index of 11. This expansion index places the expansion potential in the Very Low range.</p> <p><i>Therefore, impacts are expected to be less than significant.</i></p>				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impacts. The project will utilize existing sewer and sanitation infrastructure along the public right-of-way within the City of Moreno Valley. The project will not implement septic tanks on-site.</p> <p><i>As a result, no impact would occur.</i></p>				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less than Significant Impact with Mitigation Incorporated. The site is understood to be underlain by alluvium and has relatively flat terrain. According to the Phase I Environmental Site Assessment Report prepared by Geotek, Inc., in May 2025, the project site is located in a high paleontological sensitivity zone. The category 'High Sensitivity (High B)' indicates that fossils are likely to be encountered at or below four feet of depth and may be impacted during excavation construction activities. As ground-disturbing activities have the potential to disturb previously unknown resources, the implementation of Mitigation Measure PALEO-1 would reduce potential impacts to less than significant.</p> <p>Mitigation Measure:</p> <p>PALEO-1: The project shall retain a qualified paleontologist to monitor ground disturbing activity. Should any paleontological resources (fossils) be discovered during project grading, work shall be halted in that area until a qualified paleontologist can assess the significance of the find. The project paleontologist shall monitor remaining earthmoving activities at the project site and shall be equipped to record and salvage any fossil resources that may be unearthed. The paleontologist may 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 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.</p> <p><i>Adherence to the above-mentioned mitigation will reduce potential impacts to levels that are less than significant.</i></p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Sources:</p> <ol style="list-style-type: none"> 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. Moreno Valley 2040 General Plan 4. Title 9 – Planning and Zoning of Moreno Valley of the Moreno Valley Municipal Code; Moreno Valley Municipal Code Chapter 8.21 – Grading Regulations. 5. Appendix E - Geotechnical Engineering Report. April 2024. 6. Appendix G - Phase 1 Environmental Site Assessment (ESA), prepared by GeoTek, Inc., May 20,2025 7. California Department of Conservation’s Regional Geologic Maps. 8. California Code of Regulations. (2022). <i>California Green Building Standards Code (CALGreen Code), Title 24, Part 11.</i> 9. South Coast Air Quality Management District. (n.d.). Rule 403 and 403.2. https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-403.pdf 10. U.S. Landslide Inventory and Susceptibility Map. https://www.usgs.gov/tools/us-landslide-inventory-and-susceptibility-map 				

ISSUES & SUPPORTING INFORMATION SOURCES:

Potentially Significant Impact

Less Than Significant with Mitigation Incorporated

Less Than Significant Impact

No Impact

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

Elevated Entitlements quantified greenhouse gas (GHG) emissions resulting from the construction and operation of the project from CalEEMod Version 2022.1.1.37. This software was used as the GHG quantification tool for this project.

The proposed project would generate an estimated total of 562.01 annual mitigated metric tons of CO₂e emissions during construction. The SCAQMD recommends amortizing construction emissions over a period of 30 years to estimate the contribution of construction emissions to operational emissions over the project lifetime. Amortized over 30 years, the construction of the project will generate approximately 18.73 metric tons of CO₂e on an annualized basis. Based on the results of the CalEEMod Model, as shown in Table 1 below, the project would generate a total of 540.47 tons of CO₂e emissions per year from annual mitigated operations. By adding the amortized construction emissions results with the operational annual CO₂e emissions the project will produce 559.2 metric tons of CO₂e annually over a 30-year period, or 16,776 metric tons of CO₂e total. This cumulative level is below the SCAQMD’s recommended Tier 3 threshold of 3,000 metric tons of CO₂e emissions for residential and commercial land uses per year.

Table 1 - Project Related GHG Emissions

Summary	CO ₂ e MT/yr
Construction CO₂e Emissions¹	
2027 Construction Emissions	128.51
2028 Construction Emissions	433.50
Total Construction Emissions	562.01
Total Construction CO₂e amortized over 30 years	18.73
Operational CO₂e Emissions²	
Mobile Sources	0.00
Area Sources	3.18
Energy Usage	471.29
Water and Wastewater	23.35
Solid Waste	42.45
Refrigeration	0.21
Total Operational CO₂e Emissions	540.47
Construction and Operational CO₂e Emissions	
Project Operational Emissions Per Year (plus amortized construction emissions)	559.2 MT/yr.
SCAQMD Threshold	3,000 MT/yr.
Exceed Threshold?	No

Source: CalEEMod 2022.1.1.37

Notes:

1. CO₂e emissions per year from annual unmitigated construction
2. CO₂e emissions per year from annual unmitigated operations

ISSUES & SUPPORTING INFORMATION SOURCES:	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact.In December 2008, the South Coast Air Quality Management District (SCAQMD) Governing Board adopted the staff proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency. The SCAQMD guidance identifies a threshold of 3,000 MTCO₂eq./year for GHG for construction emissions amortized over a 30-year project lifetime, plus annual operation emissions. Table 12 shows the GHG emissions generated by the Project as determined by the CalEEMod model, which is less than SCAQMD thresholds.</p> <p>During construction of the project, GHGs would be emitted through the operation of construction equipment. However, due to the temporary and short-term construction period, the project would not result in significant and long-term impacts. During operations, mobile source emissions of GHGs would include electricity, gas use, and project-generated vehicle trips associated with residential uses. As shown in Table 12, the Project would not exceed the SCAQMD thresholds for construction and operation.</p> <p>There would be no increase in severity to the greenhouse gas impacts, and implementation of the Project will not result in Project-specific or site-specific significant adverse impacts from greenhouse gas emissions within the Project study area. Therefore, less than significant impacts would occur and no mitigation measures are needed.</p> <p><i>Therefore, impacts are expected to be less than significant.</i></p>				
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact.</p> <p>California passed the California Global Warming Solutions Act of 2006. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. Under AB 32, CARB must adopt regulations by January 1, 2011, to achieve reductions in GHGs to meet the 1990 emission cap by 2020. On December 11, 2008, CARB adopted its initial Scoping Plan, which functions as a roadmap of CARB's plans to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. CARB's 2017 Climate Change Scoping Plan builds on the efforts and plans encompassed in the initial 2022 Climate Change Scoping Plan.</p> <p>SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) that will prescribe land use allocation in that MPO's regional transportation plan. CARB, in consultation with MPOs, has provided each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035.</p> <p>Executive Order B-30-15 establishes a California greenhouse gas reduction target of 40 percent below 1990 levels by 2030 to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. Executive Order B-30-15 requires MPO's to implement measures that will achieve reductions of greenhouse gas emissions to meet the 2030 and 2050 greenhouse gas emissions reductions targets.</p> <p>As required by California law, city and county General Plans contain a Land Use Element that details the types and quantities of land uses that the city or county estimates will be needed for future growth, and that designate locations for land uses to regulate growth.</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The Project is consistent with the currently adopted General Plan for the City and the adopted Southern California Association of Governments (SCAG) Regional Transportation Plans(RTP)/SCS and is therefore consistent with the population growth and Vehicle Miles Traveled (VMT) applied in those plan documents. Therefore, the Project is consistent with the growth assumptions used in the applicable AQP.</p>				
<p>CARB's 2017 Climate Change Scoping Plan builds on the efforts and plans encompassed in the initial Scoping Plan. The current plan, CARB's Climate Change 2022 Scoping Plan, has identified new policies and actions to accomplish the State's 2030 GHG limit. Below is a list of applicable strategies in the Scoping Plan and the Project's consistency with those strategies.</p>				
<ul style="list-style-type: none"> ✓ California Light-Duty Vehicle (LDV) GHG Standards – Implement adopted standards and planned second phase of the program. Align zero-emission vehicles (ZEVs), alternative and renewable fuel and vehicle technology programs for long-term climate change goals. Implemented 100% of LDV sales to be ZEV by 2035. <ul style="list-style-type: none"> ▪ The Project is consistent with this reduction measure. This measure cannot be implemented by a particular project or lead agency since it is a statewide measure. When this measure is implemented, standards would be applicable to light-duty vehicles that would access the Project. The Project would not conflict or obstruct this reduction measure. ✓ Energy Efficiency – Pursuit of comparable investment in energy efficiency from all retail providers of electricity in California. Maximize energy efficiency building and appliance standards. <ul style="list-style-type: none"> ▪ The Project is consistent with this reduction measure. Though this measure applies to the State to increase its energy standards, the Project would comply with this measure through existing regulation. The Project would not conflict or obstruct this reduction measure. ✓ Low Carbon Fuel – Development and adoption of the low carbon fuel standard. <ul style="list-style-type: none"> ▪ The Project is consistent with this reduction measure. This measure cannot be implemented by a particular project or lead agency since it is a statewide measure. When this measure is implemented, standards would be applicable to the fuel used by vehicles that would access the Project. The Project would not conflict or obstruct this reduction measure. 				
<p>Based on the assessment above, the Project will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, any impacts would be less than significant, and no mitigation would be required.</p>				
<p>California passed the California Global Warming Solutions Act of 2006 (AB 32), which requires statewide GHG emissions be reduced to 1990 levels by 2020. Under AB 32, California Air Resource Board (CARB) must adopt regulations by January 1, 2011, to achieve the necessary reductions in GHGs to meet the 1990 emission cap by 2020. On December 11, 2008, CARB adopted its initial Scoping Plan, which functions as a roadmap of CARB's plans to achieve the required GHG reductions in California through subsequently regulations. CARB's 2017 Climate Change Scoping Plan builds on the efforts and plans outlined in the initial Scoping Plan. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Community Strategy (SCS) or an Alternative Planning Strategy (APS) that prescribes land use allocation in each MPO's regional transportation plan. CARB. In consultation with MPOs, CARB has provided each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035.</p>				
<p>As required by California law, City and County General Plans include a Land Use Element that outlines the types and quantities of land uses needed for future growth and designates locations to regulate developments. The City of Moreno Valley adheres to the 2006 General Plan and the upcoming 2040 General Plan.</p>				
<p>The proposed project complies with Chapter 7, the Conservation Element, of the City of Moreno Valley's 2006 General Plan, which addresses the City's need to reduce energy use and greenhouse gas emissions and utilizes the Energy Efficiency and Climate Action Strategy to reduce energy and water consumption and greenhouse gas emissions. The proposed project also complies with Chapter 8, the Environmental Justice Element, of the City of Moreno Valley's 2040 General Plan which addresses measures to reduce pollution exposure and improve community health. As such, it aligns with the</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>population growth and VMT applied in those plan documents. Therefore, the project is consistent with the growth assumptions used in the applicable AQMP.</p> <p><i>The project does not result in significant greenhouse gas emissions or conflict with the State's climate change regulations. Therefore, no impact will occur.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006. <ul style="list-style-type: none"> • Chapter 6 – Safety Element, Section 6.6 – Air Quality 2. Moreno Valley 2040 General Plan <ul style="list-style-type: none"> • Chapter 8 – Environmental Justice 3. Appendix A - Air Quality/Greenhouse Gas Study for WJK Commercial, prepared by Elevated Entitlements, February 2026 4. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code. 5. California Emissions Estimator Model ENVIRON 2022. CalEEMod Version 2022.1 6. California Legislative Information. (2006). <i>Assembly Bill No. 32: Global Warming Solutions Act of 2006</i>. https://leginfo.legislature.ca.gov/ 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 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less than Significant Impact.</p> <p style="text-align: center;">Construction Impacts</p> <p>Construction activities would comply with applicable laws and regulations governing the use, storage, and transportation of hazardous materials and waste. Therefore, potentially hazardous materials are used and handled appropriately, so that the public and construction workers' temporary exposure to hazards related to the transport, use, and maintenance of construction materials (i.e., oil, diesel fuel, and transmission fluid), and/or import/export of soils would be less than significant. <i>Therefore, impacts concerning the routine transport, use, or disposal of hazardous materials during project construction would be less than significant.</i></p> <p style="text-align: center;">Operational Impacts</p> <p>Hazardous materials are not typically associated with the proposed residential uses, and the project would not involve uses or activities requiring atypical transportation, use, storage, or disposal of hazardous or potentially hazardous materials not addressed under current regulations and policies. Anticipated hazardous materials may include common cleaning products, as well as pesticides and herbicides used for landscape maintenance. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure these substances are handled in an appropriately, minimizing the potential for safety impacts.</p> <p><i>Therefore, impacts concerning the routine transport, use, or disposal of hazardous materials during project operations would be less than significant.</i></p>				
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less than Significant Impact.</p> <p style="text-align: center;">Construction Impacts</p> <p>During construction activities, the risk of the accidental releases of hazardous substances, including petroleum-based fuels or hydraulic fluids associated with construction equipment, is not anticipated to be significant, given the limited quantities and low concentration of hazardous materials typically used during construction. The construction contractor would be required to implement standard construction controls and safety procedures to avoid and minimize the potential for accidental release of hazardous substances into the environment. In event of a release, standard construction practices would ensure that such materials are properly contained and remediated in accordance with applicable local, state, and federal regulations. <i>As a result, potential impacts related to accidental release of hazardous materials during construction would be less than significant.</i></p> <p style="text-align: center;">Operational Impacts</p> <p>Hazardous materials are not typically associated with residential uses. The anticipated use of hazardous materials during project operation would be limited to minor quantities of household cleaning products and the occasional application of pesticides and herbicides for landscape maintenance. Compliance with all applicable local, state, federal regulations governing the use, storage, and transportation of hazardous materials would ensure that these substances are handled appropriately, thereby minimizing the potential for safety-related impacts. Accordingly, the project would not result in</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials.</p> <p><i>Therefore, potential impacts related to hazardous material during project operation would be less than significant.</i></p>				
<p>c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less than Significant Impact. Emissions or handling of hazardous or acutely hazardous materials associated with the proposed project would not result in a significant impact to any existing or proposed schools within one-quarter mile of the project site. The nearest school, Riverside County Education Academy, is located approximately one mile southwest of the site, well beyond the quarter-mile threshold. Furthermore, the project does not propose any uses involving the routine handling of significant quantities of hazardous materials.</p> <p><i>Compliance with applicable hazardous materials regulations would further ensure that risks to sensitive receptors, such as schools, remain at a less than significant impact level.</i></p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. Existing and historical land use activities can serve potential indicators of hazardous material storage and use. Many historic and current commercial or industrial sites have experienced soil or groundwater contamination as a result of spills or leaks involving hazardous substances, including petroleum products. Additional sources of hazardous materials contamination may include leaking underground storage tanks in both commercial and rural settings.</p> <p>Government Code Section 65962.5 requires the California Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB) to maintain and update a list of hazardous materials sites that may pose a risk to public health or the environment.</p> <p>The Phase I Environmental Site Assessment (ESA) Report was prepared by GeoTek, Inc. in May of 2025 for the project, which included a search of multiple regulatory databases. The California Hazardous Material Incident Report System (CHMIRS), which reports hazardous materials incidents, was reviewed within a 0.25-mile radius of the site. The project site does not appear on the CHMIRS list, and no CHMIRS listed facilities were identified within the search area.</p> <p>The Phase I ESA Report also reviewed the California Leaking Underground Storage Tank (LUST) database, which identifies petroleum storage tanks that have reported a release. While the site is not listed in the LUST database, six LUST sites were identified within a 0.5 miles. However, based on their distances and hydrogeologic positioning, either down- or cross-gradient, these facilities do not represent an environmental concern to the project site.</p> <p>Furthermore, the project site is not included on the Riverside County list of hazardous materials sites compiled pursuant to Government Code 65962.5 (i.e., the Cortese List). Based on the findings of the Phase I ESA and the absence of listed hazardous materials sites in proximately to the project would not create a significant hazard to the public or the environment.</p> <p><i>Therefore, no impact would occur.</i></p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. The proposed project is approximately 3 miles northeast of the nearest public use airport, the March Air Force Reserve Base, which exceeds the two-mile threshold utilized to assess safety hazards and noise levels. Based on MAP MA-1, Compatibility Map, of the March Air Reserve Bae/Inland Port Airport Land Use Compatibility Plan, prepared on November 13, 2024, the project is not located within the March Air Reserve Bae/Inland Port Airport Land Use Compatibility Plan.</p> <p>Given the distance from the nearest airport and the absence of any applicable airport land use restrictions, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area.</p> <p><i>Therefore, no impacts would occur.</i></p>				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less than Significant Impact. The proposed project would not impair implementation of, or physically interfere with, any adopted emergency response or evacuation plans. The project does not propose changes to the City’s circulation system that would result in hazardous conditions, such as sharp curves or dangerous intersections, nor would it introduce incompatible land uses that could hinder emergency access.</p> <p>While temporary lane closures may be required during construction, a traffic management plan would be implemented to minimize potential congestion and maintain safe and effective circulation for all vehicles, including emergency responders. Emergency access to and from the project site and surrounding areas would be maintained at all times.</p> <p><i>Therefore, impacts related to emergency response or evacuation plans would be less than significant.</i></p>				
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. The project site is located within an urbanized area and is not designated as a fire hazard severity zone by CalFire, as indicated on the Riverside County Fire Hazard Severity Zone Map. The site is not located within or adjacent to wildlands, nor is it within a Very High Fire Hazard Severity Zone as mapped by CalFire.</p> <p>The project would be constructed in accordance with current applicable building codes and would comply with all conditions imposed through the development review process, including those from the Moreno Valley Fire Department (MVFD). As such, the proposed project would not expose people or structures to a significant wildfire risk.</p> <p><i>Therefore, no impact would occur.</i></p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006 <ul style="list-style-type: none"> • Chapter 9 – Goals, Objectives, Policies, and Programs • Chapter 2 – Community Development Element – Section 2.10– Community Design • Chapter 7 – Conservation Element – Section 7.8 – Scenic Resources; and Figure 7-2 Major Scenic Resources. 2. Appendix G - Phase 1 Environmental Site Assessment (ESA), prepared by GeoTek, Inc., May 20, 2025 3. CalFire Fire Hazard Severity Zones in State Responsibility Area, Office of the State Fire Marshal (OSFM) 4. Appendix J – Project Plans, 2025 5. California Hazardous Material Incident Report System (CHMIRS) 6. California State Water Resources Control Board (SWRCB) GeoTracker https://www.waterboards.ca.gov/ust/electronic_submittal/ 7. Department of Toxic Substances Control (DTSC), Your EnviroStor https://www.envirostor.dtsc.ca.gov/public/ 8. March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, Compatibility Map, November 13, 2024 https://rcaluc.org/sites/g/files/aldnop421/files/2023-06/March.pdf 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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X. HYDROLOGY AND WATER QUALITY – Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Response:

Less Than Significant Impact. This analysis is based on the following technical studies:

- **Preliminary Hydrology Report**, WJK Development Co., prepared by Blue Engineering; dated December 2024 (Appendix F1).
- **Project Specific Water Quality Management Plan (WQMP)**, WJK Development Co., prepared by Blue Engineering & Consulting, Inc; dated January 29, 2025 (Appendix F2).

Construction activities associated with the proposed project could potentially affect the water quality through the handling, storage, and disposal of construction materials, maintenance and operation of construction equipment, and earth moving activities such as grading. These activities may generate pollutants, including sediment, which could enter local drainage systems and downstream receiving waters if not properly managed.

The project is subject to the requirements of the Santa Ana Regional Water Quality Control Board (SARWQCB) and the City of Moreno Valley’s 2022 Construction Stormwater General Permit (Order 2022-0057-DWQ), issued under the National Pollutant Discharge Elimination System (NPDES). Compliance with this permit requires preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and a project-specific Water Quality Management Plan (WQMP). These plans must be incorporated into Best Management Practices (BMPs) designed to prevent water pollution and control stormwater runoff during and after construction.

The submitted WQMP identifies **five on-site detention basins** to manage and treat stormwater runoff:

- **BMP 1:** 1,728 cubic feet
- **BMP 2:** 3,259 cubic feet
- **BMP 3:** 4,437 cubic feet
- **BMP 4:** 3,554 cubic feet
- **BMP 5:** 488 cubic feet

These proposed detention basins will be maintained by either the Homeowner’s Association (HOA) or a Property Owners Association (POA).

The potential sources of runoff identified in the project’s WQMP include:

- 1) On-site storm drain inlets
- 2) Landscape/outdoor pesticide use
- 3) Pools, spas, ponds, decorative fountains and other water features
- 4) Refuse areas
- 5) Outdoor storage of equipment or materials
- 6) Vehicle and equipment cleaning
- 7) Vehicle and equipment repair and maintenance

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>8) Fire sprinkler test water</p> <p>9) Roofing, gutters and trim/condensate drain lines</p> <p>10) Plazas, sidewalks and parking</p> <p>With the implementation of required BMPs and adherence to all applicable regulations and permit conditions, impacts to water quality would be minimized.</p> <p><i>Therefore, water quality impacts resulting from project construction and operation would be less than significant.</i></p>				
<p>b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The proposed project will not utilize wells or extract groundwater for any purpose. Additionally, the project site is not currently used for groundwater recharge and does not contain features such as infiltration basin or natural recharge areas.</p> <p>Water service for the project would be provided by the Eastern Municipal Water District (EMWD), and the development would connect to the existing municipal water infrastructure. As such, the project would not result in a direct depletion of groundwater supplies.</p> <p>Because the site is already urbanized and the proposed development would not alter groundwater recharge capacity in a meaningful way, the project would not interfere with sustainable groundwater management.</p> <p><i>Therefore, impacts related to groundwater supply and recharge would be less than significant.</i></p>				
<p>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:</p>				
<p>i) Result in substantial erosion or siltation on- or off-site?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less than Significant with Mitigation Incorporated. According to the <i>Preliminary Hydrology Study</i> prepared for the project, construction and operation of the project may result in erosion or siltation on-site or off-site. The hydrology conditions for both on-site and off-site areas associated with the Cottonwood Apartments development are detailed in the Hydrology Report. With the incorporation of Mitigation Measure HYDRO-1, potential increases in stormwater flow would be reduced to acceptable levels.</p> <p>Post-mitigation, the volume of stormwater discharged into the existing storm drain system would be equal to or less than existing conditions. As a result, the hydraulic grade line (HGL) of the system would remain unchanged, and no backwater conditions are anticipated.</p> <p>During grading activities and prior to the installation of permanent drainage improvement, the construction contractor will implement temporary erosion control measures as needed to prevent sediment transport. These measures will ensure that erosion or siltation impacts, both on-site and off-site, are minimized throughout the construction period.</p> <p><i>Therefore, with implementation of the identified mitigation measure, potential impacts related to erosion and siltation would be less than significant.</i></p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Mitigation Measure HYDRO-1:</p> <p>The applicant shall mitigate the increase in stormwater runoff generated by the project through the construction of five on-site detention basins with a combined storage capacity of up to 9,795 cubic feet. These basins shall be in accordance with the approved grading and drainage plans and shall be subject to review and approval by the City of Moreno Valley Public Works Department to ensure compliance with applicable hydrologic design standards</p>				
<p>ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less than Significant with Mitigation Incorporated. Construction and operation of the project may result in surface runoff that could potentially cause on-off or off-site flooding. As discussed in Section c)i), the Cottonwood Apartments development accommodates both on-site and off-site flows. According to the <i>Preliminary Hydrology Study</i>, off-site runoff naturally flows traverses the project site and is directed to two existing catch basins along Cottonwood Avenue. The existing HGL line, as shown in the as-built plans, has been designed to accommodate this flow.</p> <p>Post mitigation conditions will ensure that stormwater runoff from the developed site entering the existing storm drain system will be equal or less than existing conditions. As a result the HGL will remain unchanged, and no backwater effects are anticipated.</p> <p>Furthermore, based on the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer Viewer, the project site is located within Flood Insurance Rate Map (FIRM) Panel Number 06065C0770G dated 8/28/2008. The site is designed as being within an area of minimal flood hazard (Low Risk Zone). Therefore, the project site is not expected to be inundated by flood flows during its operational life, nor would not impede or redirect such flows.</p> <p><i>With implementation of the proposed mitigation measures, impacts related to surface runoff and potential flooding would be reduced to a less than significant level.</i></p>				
<p>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?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less than Significant with Mitigation Incorporated. Construction and operation of the project may result in runoff water that could exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. However, as described previously, the project is required to implement Best Management Practices (BMPs), including the construction of five detention basins, to control and treat stormwater during construction and operation.</p> <p>These measures are designed to ensure that stormwater runoff volumes and flow rates do not increase beyond pre-development conditions. As a result, the project would not create or contribute runoff water that exceeds the capacity of existing or planned drainage systems.</p> <p><i>With implementation of the required BMPs and detention infrastructure, impacts related to stormwater drainage capacity and polluted runoff would be less than significant with mitigation incorporated.</i></p>				
<p>iv) Impede or redirect flood flows?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less than Significant with Mitigation Incorporated. Based on a review of the FEMA National Flood Hazard Layer Viewer, the project site is located within FIRM Panel Number 06065C0770G, dated August</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>28, 2008. According to the FEMA flood zone designation, the site is identified as an area of minimal flood hazard (Low Risk Zone).</p> <p>Given this designation, the project site is not expected to be inundated by flood flows over the life of the project. Furthermore, the proposed project would not impede or redirect flood flows.</p> <p><i>Therefore, with implementation of standard design features and applicable mitigation measures, potential impacts related to flooding would be less than significant impacts with mitigation incorporated.</i></p>				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No impact. The proposed project is not located within a designated flood hazard area, tsunami inundation zone, or seiche zone. According to the FEMA National Flood Hazard Layer Viewer, the site is located within FIRM Panel Number 06065C0770G, dated August 28, 2008. The FEMA flood zone designation identifies the site as an area of minimal flood hazard (Low Risk Zone).</p> <p>Given this designation and the site's location, the project is not expected to be subject to flooding, tsunami, or seiche-related hazards.</p> <p><i>Therefore, no impacts would occur</i></p>				
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The project site is located within the Santa Ana River Hydrologic Unit, part of the South Coast Hydrologic Region. The Santa Ana Regional Water Quality Control Board (RWQCB) is responsible for basin planning and water quality regulation in this region. The RWQCB prepares and maintains the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan), which identifies the beneficial uses of surface waters and groundwater resources and sets water quality objectives to project those uses.</p> <p>The California Department of Water Resources (DWR) has implemented Basin Prioritization under the California Statewide Groundwater Elevation Monitoring (CASGEM) program and the Sustainable Groundwater Management Act (SGMA). This process categorizes California's 515 groundwater basins into four priority levels such as, high, medium, low, or very low based on criteria set forth in California Water Code Section 10933(b). Basin designated as high or medium priority are required to form Groundwater Sustainability Agencies (GSAs), prepare Groundwater Sustainability Plans (GSPs), and implement long-term sustainable groundwater management strategies</p> <p>According to DWR's SGMA Basin Prioritization Dashboard, the project site is located within the San Jacinto Groundwater Basin (SJGB), which is approximately 248 square miles in size and designated as High Priority Basin with a score of 22 priority points. In response, the Eastern Municipal Water District (EMWD) adopted a GSP for the SJGB in September 2021, in accordance the SGMA requirements.</p> <p>The GSP outlines sustainable management criteria designated to maintain and project groundwater resources. Key objectives include:</p> <ul style="list-style-type: none"> • Maintaining sufficient groundwater in storage to allow for ongoing groundwater production that meets the operational demands of groundwater users in the Plan Area. • Protecting beneficial uses such as municipal and domestic supplies of fresh groundwater resources in the Lakeview and Perris North Groundwater Management Zones (GMZs) to the 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>extent possible, by minimizing the northward and eastward migration of brackish groundwater from the Perris South GMZ.</p> <ul style="list-style-type: none"> • Avoiding subsidence related to groundwater production that substantially interferes with surface land uses. • Ensuring that groundwater production does not result in significant and unreasonable loss of groundwater dependent ecosystems. <p>The GSP also identifies six sustainability indicators used to monitor groundwater conditions: groundwater levels, groundwater in storage, seawater intrusion, water quality, land subsidence, and depletion of interconnected surface water. Projects within the basin are expected to be compatible with GSP to ensure long-term groundwater sustainability.</p> <p>The proposed project complies with the GSP and related SGMA requirements. Additionally, the Preliminary Hydrology Study prepared for the project indicates that on-site infiltration is not feasible due to site-specific constraints. As a result, the project is not expected to adversely impact any of the sustainability indicators outlined in the GSP.</p> <p><i>Therefore, impacts to groundwater resources and regional groundwater management objectives would be less than significant.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006 <ul style="list-style-type: none"> • Chapter 6 – Safety Element – Section 6.7 – Water Quality 2. Appendix F1- Preliminary Hydrology Study, prepared by Blue Engineering and Consulting, Inc., December 2024 3. Appendix F2 – Project Specific Water Quality Management Plan, prepared by Blue Engineering and Consulting, Inc., January 2025 4. Appendix J- Project Plans, 2025 5. California Department of Water Resources SGMA Basin Prioritization Dashboard https://gis.water.ca.gov/app/bp-dashboard/final/ 6. Groundwater Sustainability Plan for the San Jacinto Groundwater Basin, prepared by EMWD in September 2021 7. Federal Emergency Management Agency (FEMA) Flood Zone Hazard Layer Map https://www.fema.gov/flood-maps/national-flood-hazard-layer 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XI. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Response:

No Impact. The project site is currently vacant and undeveloped and is surrounded by a mix of existing land uses. Surrounding uses and zoning designations include:

- **North of the project site:** A single-family residential subdivision located along the north side of Cottonwood Avenue, zoned **Residential 5 District (R5)**.
- **East of the project site:** A single-family residential subdivision bordering the eastern boundary of the site, with units fronting Cottonwood Avenue, also zoned **Residential 5 (R5)**.
- **South of the project site:** A Catholic church, a single-family home, a storage yard and an adjacent gas station. These uses fall within **Residential 5 District (R5)** and **Office District (O)** zoning designations.
- **West of the project site:** A single-family residential subdivision and a gas station, zoned **Residential 5 District (R5)** and **Community Commercial District (CC)**.

The proposed project will occur entirely within the boundaries of the project site. The granting of the requested entitlements and subsequent construction of the proposed project will not result in any expansion of use beyond the current boundaries. As a result, the project will not disrupt or divide any existing neighborhoods.

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

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Response:

Less Than Significant Impact. The proposed project includes a Zone Change from Residential 10 (R10) to Residential 20 (R20) and a corresponding General Plan Amendment to change the land use designation from R10 to R20. The project proposes the development of 184 apartment units on a 9.39-acre vacant site located north of Cottonwood Avenue and east of Perris Boulevard. With a proposed density of approximately 19.5 units per acre, the project is consistent with allowable development standards under both the proposed zoning and General Plan land use designation.

The proposed development is a permitted use under both the existing and proposed General Plan and Zoning Ordinance classifications. Furthermore, the project is subject to site-specific design review and must comply with applicable development standards outlined in the **Moreno Valley Municipal Code, Title 9, Planning and Zoning**, and the City's **General Plan**, and any other applicable policies or ordinances adopted for the purpose of avoiding or mitigating environmental impacts.

Project-level environmental review ensures compliance with these standards including conformance with land use compatibility, density regulations, building height, setbacks, open space requirements, and circulation policies. As such the project would not result in any environmental impacts due to conflict with an applicable land use plan, policy, or regulation adopted for the purpose of environmental protection.

Therefore, impacts related to land use and planning would be less than significant, and no mitigation is required.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006 <ol style="list-style-type: none"> a. Chapter 2 – Community Development Element – Section 2.1 – Land Use. Figure 2-1 – Neighboring Land Uses; Figure 2-2 – Land Use Map. 2. Moreno Valley 2040 General Plan <ol style="list-style-type: none"> a. Chapter 2 – Land Use and Community Character 3. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006. <ol style="list-style-type: none"> a. Section 5.12 – Population and Housing 4. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code. 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. According to the City of Moreno Valley 2006 General Plan, the City of Moreno Valley 2040 General Plan, and the California Department of Conservation (DOC) Mines and Minerals Web Map, no mineral resources of statewide or regional significance have been identified within the City Limits. In addition, according to the California Department of Conservation Mines and Mineral Resources, the project site is not within 5 miles of any current mining operations. All proposed developments will comply with MVMC Section 8.21.020 A 7 – Grading Regulations, which include grading permits requirements for mining in the City of Moreno Valley.</p> <p>The Department of Conservation categories Mineral Resource Zones into three categories, including MRZ-1, MRZ-2, and MRZ-3, as described below:</p> <p>MRZ-1: Areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources.</p> <p>MRZ-2: Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists. This zone shall be applied to known mineral deposits or where well-developed lines of reasoning, based upon economic-geologic principles and adequate data, demonstrate that the likelihood for occurrence of significant mineral deposits is high.</p> <p>MRZ-3: Areas containing known or inferred mineral occurrences of undetermined mineral resource significance.</p> <p>According to California Geological Survey of Mineral Land Classification, Special Report (SR) 206, prepared by the Department of Conservation in 2008, the project site is not located within a designated Mineral Resources Zone (MRZ) in the City of Moreno Valley. The Map indicates that the project is within an Urban Area, and has no presence of MRZ-1, MRZ-2, or MRZ-3.</p> <p><i>As the project does not involve or impact mineral resources and is not located in or near a designated area, no direct or indirect impacts to mineral resources are anticipated, and no mitigation is required</i></p>				
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. See Response XII, a). The City’s 2006 General Plan and Zoning Map and the City’s future 2040 General Plan and Zoning Map do not identify any locally important mineral resources at the project site or in the local vicinity. The project site is not located within an area designated for mineral resources recovery in any adopted local general plan, specific plan, or other land use plans.</p> <p>As such, the proposed project would not result in the loss of availability of a known mineral resource that is locally important, nor would it impact a mineral resource recovery site identified in any local planning document.</p> <p><i>Therefore, no impacts related to locally important mineral resources would occur, and no mitigation is required.</i></p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006. <ol style="list-style-type: none"> a. Chapter 7 – Conservation Element – Section 7.9 – Mineral Resources 2. Moreno Valley 2040 General Plan 3. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006; <ol style="list-style-type: none"> a. Section 5.14 – Mineral Resources. 4. California Department of Conservation Surface Mining and Reclamation Act (SMARA) of 1975 5. Title 9 – Planning and Zoning of the Moreno Valley Municipal Code <ol style="list-style-type: none"> a. Section 9.02.120 – Surface Mining Permits 6. California Department of Conservation (DOC) Mines and Mineral Resources Web Map https://maps.conservation.ca.gov/mineralresources/#webmaps 7. California Department of Conservation: Mineral Land Classification Maps https://maps.conservation.ca.gov/mineralresources/#webmaps 8. California Geological Survey of Mineral Land Classification, Special Report 206, prepared by the Department of Conservation, 2008 				

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

XIII. NOISE – Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Response:

Less Than Significant with Mitigation Incorporated.

Applicable Regulations and Standards

Section 11.80.030(C) of the City of Moreno Valley Municipal Code sets forth limitations on non-impulsive noise. These limitations prohibit any person from creating, maintaining, or operating noise on private property that exceeds the noise levels established in Table 4- Noise Standards, from Appendix H, Noise Analysis for Cottonwood Apartments, Moreno Valley, CA, prepared by Elevated Entitlements, February 2026. If noise originates from public right-of-way, public space, or other public spaces, measurement shall be taken directly at the source. Noise levels that exceed the noise standards are considered disturbance.

Table 4 - Noise Standards

Residential		Commercial	
Daytime ¹	Nighttime ²	Daytime ¹	Nighttime ²
60 dBA	55 dBA	65 dBA	60 dBA

¹ Daytime means 8:00 a.m. to 10 p.m.

² Nighttime means 10:01 p.m. to 7:59 a.m.

dBA = A-weighted decibels

L_{ed} = equivalent continuous sound level

Source: Appendix H- Noise Analysis for Cottonwood Apartments, Moreno Valley, CA, prepared by Elevated Entitlements, February 2026

Additionally, per Section 11.80.030(D)(7) of the City’s Municipal Code, construction activities generating noise between 8:00 p.m. and 7:00 a.m. are prohibited unless deemed emergency work or specifically authorized by the City Manager or their designee.

Significance Thresholds

The proposed project is located within the City of Moreno Valley, which adheres to the 2006 General Plan and the upcoming 2040 General Plan. According to the City of Moreno Valley’s 2006 General Plan, the proposed project includes a Zone Change from Residential 10 (R10) to Residential 20 (R20) and a corresponding General Plan Amendment to change the land use designation from R10 to R20. However, if the City of Moreno Valley 2040 General Plan is approved prior to Project approval, the Project would not require the proposed Project to conduct a zone change, as the Project’s underlying zoning is consistent with the 2040 General Plan.

The proposed project complies with the City of Moreno Valley’s 2006 General Plan’s Safety Hazards Element (Chapter 6) and the City of Moreno Valley’s 2040 General Plan’s Noise Element (Chapter 7), which provides background information on noise fundamentals, community response, and planning considerations. However, it does not establish specific land use-based thresholds for assessing impacts from off-site transportation-related noise.

As such, this analysis utilizes the land use/noise compatibility standards outlined in the California Office of Planning & Research (OPR) General Plan Guidelines from, which are widely used by jurisdictions through the state. These standards defined maximum allowable noise exposure levels for various land uses, including multi-family residential development such as the proposed project.

ISSUES & SUPPORTING INFORMATION SOURCES:

Potentially Significant Impact

Less Than Significant with Mitigation Incorporated

Less Than Significant Impact

No Impact

According to the OPR guidelines, the following thresholds apply to multi-family residential land uses:

- **Less than 60 dBA CNEL:** Considered Normally Acceptable
- **60 to 70 dBA CNEL:** Considered Acceptable, where design and mitigation may be required
- **Greater than 70 dBA CNEL:** Considered Normally Unacceptable

These identify the criteria for multi-family residential land uses such as the Proposed project, as shown within the Noise Study prepared by Elevated Entitlements. When the unmitigated, exterior noise levels are below 60 dBA CNEL project land use is considered normally acceptable. With exterior noise levels ranging from 60 to 70 dBA CNEL, multi-family residential land uses are considered conditionally acceptable. Noise levels exceeding 70 dBA CNEL are considered normally unacceptable.

Project Impacts

Construction

This assessment analyzes potential noise impacts during all expected phases of construction, including site preparation, grading, building construction, paving, and architectural coating. Noise levels are modeled based on the average distance between construction equipment and the nearest noise-sensitive receptors over 8-hour period.

According to the modeling results presented in **Table 8 - Construction Noise Level Compliance**, from the Noise Study prepared by Elevated Entitlements, construction-related noise levels are anticipated to exceed the City of Moreno Valley's recommended 8-hour average noise threshold at adjacent residential properties.

*To address this exceedance, the project shall implement **Mitigation Measure NOISE-1**, which requires equipment with noise shielding and muffling devices to be utilized during construction. The project shall implement **Mitigation Measure NOISE-2**, which requires construction site noticing to be visible and accessible to the public. The project shall implement **Mitigation Measure NOISE-3** to ensure no damage to sensitive receivers, such as single-family residences.*

*With implementation of **Mitigation Measure NOISE-1**, **Mitigation Measure NOISE-2**, and **Mitigation Measure NOISE-3**, construction -related noise impacts would be reduced to a less than significant level.*

Table 8 Construction Noise Level Compliance

Receiver Location	Construction Noise Levels (dBA Leq)		
	Highest Construction Noise Levels ²	Threshold ³	Threshold Exceeded? ⁴
R1	75.98 (97 ft)	80	No
R2	86.69 (20 ft)	80	Yes
R3	93.98 (10 ft)	80	Yes
R4	90.68 (13 ft)	80	Yes

1. Noise receiver locations are shown in Figure 13-2

2. Highest construction noise level calculations based on distance from the construction noise source activity to the nearest receiver locations. Calculations based on Calcemod estimates.

3. Construction noise level thresholds as established by the FTA

4. Do the estimated Project construction noise levels exceed the construction level threshold?

ISSUES & SUPPORTING INFORMATION SOURCES:

Potentially Significant Impact

Less Than Significant with Mitigation Incorporated

Less Than Significant Impact

No Impact

Source: Appendix H- Noise Analysis for Cottonwood Apartments, Moreno Valley, CA, prepared by Elevated Entitlements, February 2026

Operation

The main sources of noise generated by the project would include outdoor play areas (i.e., tot lots / turf grass), pool activity, trash enclosures, parking lots, HVAC equipment, and vehicular traffic noise along the adjacent roadways. Noise level impacts are compared to the City of Moreno Valley noise standards.

According to the Elevated Entitlements Noise Study, prepared in February 2026, typical activities within parking areas, such as tire squeals and car alarms can produce noise levels ranging from approximately 49 dBA to 74 dBA at a distance of 50 feet. The proposed parking lot is located adjacent to the existing residential uses along the southern boundary of the site, where sensitive receptors may be affected.

To reduced potential noise impacts at these sensitive locations, the project proposes the installation of a six-foot concrete masonry wall (CMU), accompanied by landscape hedging along the property line. This combination of structural and vegetative screening will help to attenuate noise generated by operational activities and reduce sound propagation to nearby residences.

*The project shall implement **Mitigation Measure NOISE-4** to ensure no idling signs shall be posted. Finally, the project shall implement **Mitigation Measure NOISE-5** which requires a 6-foot-tall CMU (Concrete Masonry Unit) block wall to be installed along the property boundary. With the implementation **Mitigation Measure NOISE-4, Mitigation Measure NOISE-5**, operational noise impacts be reduced to less than significant.*

Exterior Noise

The potential off-site noise impacts resulting from increased vehicular traffic associated with operation of the proposed project were analyzed under both direct and cumulative conditions. According to the findings presented in the table below, **Exterior Noise Levels**, from the Noise Study prepared by Elevated Entitlements, the project would not result in a significant noise impact from on-site exterior sources, including traffic, with the implementation of **Mitigation Measure NOISE-4 and Mitigation Measure NOISE-5**. *This mitigation ensures compliance with applicable noise standards and effectively reduces potential impacts to a less than significant level.*

Exterior Noise Levels

Receiver Location	Roadway	Unmitigated Noise Level (dBA CNEL)	Unmitigated Land Use Compatibility	Mitigated Noise Level (dBA CNEL)	Mitigated Land Use Compatibility
Single Family Residence - Southeast	Cottonwood Ave.	76.3	Normally Unacceptable	60.9	Normally Acceptable
Single Family Residence - Southwest	Cottonwood Ave.	73.1	Normally Unacceptable	61.5	Normally Acceptable

Source: Appendix H- Noise Analysis for Cottonwood Apartments, Moreno Valley, CA, prepared by Elevated Entitlements, February 2026

Interior Noise

As discussed above, the exterior noise levels at the nearest residential receptors were modeled and shown to be below the “Normally Acceptable” threshold of 65 dBA CNEL, as outlined in the Land Use Compatibility for Criteria with the implementation of noise mitigation measures. Given that the exterior

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>noise mitigation measures would bring the respective noise levels at the property boundary to acceptable levels, the interior noise levels within the residential units are expected to be below the normally acceptable threshold.</p> <p>In addition, this analysis relies on the City of Moreno Valley 45 dBA CNEL interior limit for new construction. The interior noise level is determined by the difference between the predicted exterior noise level at the building façade and the noise reduction provided by the structure. Standard building construction typically provides a Noise Reduction (NR) of approximately 12 dBA with windows open and a minimum of 25 dBA with windows closed. In addition, fresh air circulation will be provided, which would provide a NR up to 20 dBA. Any sound leaks, cracks, and openings within window assembly can significantly reduce its ability to attenuate noise. However, the project's design will comply with the California Energy Code and California Building Code requirements, ensuring interior noise levels remain acceptable.</p> <p><i>With the incorporation of Mitigation Measure NOISE-1 through NOISE-5, construction and operational noise impacts would be reduced to less than significant. No significant and unavoidable impacts related to noise would occur as a result of project implementation.</i></p> <p>Mitigation Measures:</p> <p>MM NOISE - 1: The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. (Approximately 3 dBA of estimated reduction)</p> <p>MM NOISE - 2: A construction site notice shall be provided that includes the job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.</p> <p>MM NOISE - 3: Within 2 feet of the property line, construction equipment shall not utilize construction equipment that exceeds PPV at 25 ft, in/sec of 0.035.</p> <p>MM NOISE - 4: No idling signs shall be posted along the perimeter wall/fence.</p> <p>MM NOISE - 5: To reduce noise transmission, 6-foot-tall CMU (Concrete Masonry Unit) block wall will be installed along the property boundary. These walls will act as a physical barrier to attenuate noise, helping to minimize sound impacts on nearby noise-sensitive areas.</p>				
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant with Mitigation Incorporated.</p> <p><u>Introduction</u></p> <p>Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hz. The frequency of a vibrating object describes how rapidly it oscillates.</p> <p>While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz), or when foundations or utilities, such as sewer and water pipes, physically connect to the structure and the vibration source.</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Vibration Thresholds and Guidelines

The background vibration-velocity level in residential areas is generally 50 VdB. Groundborne vibration is normally perceptible to humans at approximately 65 Vdb. For most people, a vibration-velocity of 75 Vdb is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration is rarely perceptible.

The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

The construction vibration analysis shall utilize the methodology described in the Transit Noise and Vibration Impact Assessment Manual prepared by the Federal Transit Administration (FTA, September 2018). Vibrations associated with construction can be estimated based on the typical vibration levels associated with construction equipment anticipated to operate onsite. Once the anticipated vibration level from the equipment that would operate onsite is calculated at the nearest sensitive use, the level will be compared to the vibration damage threshold.

The vibration significance threshold shall be 0.2 inches per second peak particle velocity (PPV) for Type III - Non-engineered timber and masonry buildings. The following formula from the Transit Noise and Vibration Impact Assessment Manual was utilized to calculate the Vibration impacts.

$$PPV_{\text{equip}} = PPV_{\text{ref}} \times (25/D)^{1.5}$$

Where :

PPV_{equip} = the peak particle velocity of the equipment adjusted for distance, in/sec

PPV_{ref} = the source reference vibration level at 25 ft, in/sec

D=distance from the equipment to the receiver

As the nearest residential home, Receiver 3, is approximately 6 feet from the property line, this analysis utilized the calculation below to determine the source reference vibration level at 25 ft, in/sec (PPV_{ref}) with the threshold value of 0.2 PPV and a distance of 3 feet. The following calculation indicates that the PPV_{ref} would be 0.024 PPV. This limits the equipment to small bulldozers or hand demolition, as shown below.

$$PPV_{\text{equip}} = PPV_{\text{ref}} \times (25/D)^{1.5}$$

$$0.2 = PPV_{\text{ref}} \times (25/6)^{1.5}$$

$$PPV_{\text{ref}} = 0.024$$

As shown below, the project shall not use any excessive construction equipment that has a PPV rating greater than 0.024 PPV within 8 feet of the nearest sensitive use. This was calculated by utilizing the next most impactful construction equipment (Jackhammer at 0.035 PPV) to determine the minimum distance at which this equipment could be utilized while not exceeding the Construction Vibration Damage Criteria of 0.2 PPV at the aforementioned Class III sensitive use.

$$PPV_{\text{equip}} = PPV_{\text{ref}} \times (25/D)^{1.5}$$

$$0.2 = 0.035 \times (25/D)^{1.5}$$

$$D = 7.8 \text{ feet} \approx 8 \text{ feet}$$

Therefore, with the implementation of Mitigation Measure **NOISE - 3**, impacts from construction related groundborne vibration will be less than significant.

Mitigation Measures

MM NOISE- 1: Within 2 feet of the property line, construction equipment shall not utilize construction equipment that exceeds PPV at 25 ft, in/sec of 0.035.

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,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
would the project expose people residing or working in the project area to excessive noise levels?				
<p>Response:</p> <p>No Impact. The proposed project is not located within the Airport Safety Review Area, as designated by applicable land use plan. Additionally, the site is not located more than two miles from any private or public use airport or airstrip. As a result, the project would not result in a safety hazard for people residing or working in the project area.</p> <p><i>Therefore, no impacts would occur.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006, Chapter 6 – Safety Element – Section 6.4 – Noise 2. City of Moreno Valley’s 2040 General Plan, Chapter 7 - Noise Element 3. Appendix H- Noise Analysis for Cottonwood Apartments, Moreno Valley, CA prepared by Elevated Entitlements, February 2026 4. California Office of Planning and Research - General Plan Guidelines -Noise Element Guidelines 5. Title 11- Peace, Morals and Safety of the Moreno Valley Municipal Code, Section 11.80.30 6. Transportation and Construction Vibration Guidance Manual. California Department of Transportation. April 2020. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf <ol style="list-style-type: none"> a. Table 19 – Guideline Vibration Damage Potential Threshold Criteria 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. According to the U.S. Census Bureau, the population of the City of Moreno Valley was estimated at 212,392 as of July 1, 2023. Updated figures indicate that by May 2024, the City’s population increased to 213,566, reflecting an approximate 1% annual growth rate, which is consistent with historical trends and is not considered substantial.</p> <p>The proposed project would introduce 184 multi-family residential units, with an estimated population increase of approximately 288 residents (based on an average household size of 1.57 persons per unit). This incremental growth represents approximately 0.13% of the City’s current population and would not result in substantial population growth or exceed planned development levels identified in the City’s General Plan or Regional Housing Needs Assessment (RHNA) allocation.</p> <p><i>As such, the proposed project would not induce substantial unplanned growth in the area, either directly or indirectly, and impacts related to population growth would be less than significant. No mitigation is required.</i></p>				
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. The proposed project would not displace any existing housing, as the project site is currently vacant and undeveloped. No residential structures exist on the site, and none would be demolished or relocated as a result of project implementation.</p> <p>Accordingly, the project would not result in the displacement of housing or require the construction of replacement of housing elsewhere no existing housing units would be demolished as part of this proposal.</p> <p><i>Therefore, no impact would occur.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006. <ul style="list-style-type: none"> • Chapter 2 – Community Development Element – Section 2.1 – Land Use; Figure 2-1 – Neighboring Land Uses; Figure 2-2 - Land Use Map 2. Moreno Valley 2040 General Plan <ul style="list-style-type: none"> • Chapter 2 – Land Use and Community Character Element 3. Final Environmental Impact Report City of Moreno Valley General Plan, certified July 11, 2006. <ul style="list-style-type: none"> • Section 5.12 – Population and Housing. 4. U.S. Census Bureau, Moreno Valley Population 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. PUBLIC SERVICES – Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Response:

Less Than Significant Impact. The proposed project entails the construction of a 184-unit multi-family development on a currently vacant site within an urbanized area of the City of Moreno Valley. The project is located in a region already served by adequate public services, including fire protection and emergency medical services.

Fire protection and emergency medical response services in the project vicinity are provided by the Riverside County Fire Protection District (RCFPD). The nearest fire station, RCFPD Station 99, is located at 13400 Morrison Street, approximately 1.8 miles west of the project site. Additionally, emergency medical services are available through Riverside University Health System -Medical center, located approximately 4 miles from the project site.

The project site is within the City's designated service area and is consistent with land uses anticipated under the 2006 Moreno Valley General Plan and the 2040 Moreno Valley General Plan. The proposed development is not expected to result in the need for new or expanded fire protection facilities, as adequate service infrastructure already exists in the vicinity.

In accordance with the City of Moreno Valley's Development Impact Fee (DIF) Ordinance (Ordinance No. 695), the project applicant will be required to pay impact fees that support the development and maintenance of public facilities, including fire stations, emergency response services, and related infrastructure. These fees help mitigate the cumulative demand placed on public services by new development.

Therefore, impacts on fire protection and emergency medical services would be less than significant, and no mitigation is required.

ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Response:

Less Than Significant Impact. Police protection services in the project vicinity are provided by the City of Moreno Valley Police Department, including the branch of the Riverside County Sherriff's Department, which provides patrol service to the Moreno Valley area. The department provides patrol, investigation, and emergency response services throughout the City, including the project area.

The proposed project is located within an existing urbanized area already served by the City's law enforcement network. It does not introduce unanticipated land uses or population growth beyond what is projected in the General Plan. Furthermore, the project applicant will be required to DIF in accordance with Ordinance No. 695, which are used by the City to fund public services, including law enforcement facilities and equipment.

As a result, the project would not result in the need for new or physically altered police protection facilities.

Therefore, impacts related to police protection would be less than significant, and no mitigation is required.

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The proposed project would introduce approximately 184 multi-family residential units, which may result in an increase in the number of school-aged children residing in the area. However, the project is located within the Moreno Valley Unified School District (MVUSD), and more than 10 public schools, ranging from elementary through high school, are located within a 2-mile radius from the project site providing sufficient capacity to accommodate potential students from the proposed development.</p> <p>According to enrollment data obtained from the California Department of Education (CDE) through the California Longitudinal Pupil Achievement Data System (CALPADS), enrollment within the Moreno Valley Unified School District (MVUSD) has declined over the past five years. Specifically, student enrollment decreased from 32,281 students in 2019-2020 to 31,344 students in 2023-24 school year. This trend indicates available capacity within existing school facilities.</p> <p>Additionally, the project applicant will be required to pay school impact fees directly to the school district to contribute to the maintenance and expansion of educational facilities. These fees are designed to offset the potential demand for public school services resulting from new residential development.</p> <p><i>As a result, the project is not expected to create significant burden on local schools or require the construction of new school facilities. Impacts would be less than significant, and no mitigation is required.</i></p>				
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The proposed project would not significantly increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. While the project would introduce additional residents to the area, the impact on local and regional recreational resources is expected to be minimal.</p> <p>The proposed development includes on-site recreational amenities, such as tot lot and ample open space, to serve the recreational needs of future residents. These features are designed to reduce reliance on off-site park facilities and provide convenient, accessible recreational opportunities within the project site.</p> <p>Furthermore, the project will be subject to the City of Moreno Valley's Development Impact Fees, which support the enhancement, maintenance, and expansion of public recreational facilities citywide. These fees help to ensure that new development contribute its fair share toward maintaining the quality of recreational resources.</p> <p><i>Therefore, the proposed project would result in a less than significant impact on recreational facilities, and no mitigation is required.</i></p>				
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact.</p> <p>Solid Waste</p> <p>The proposed project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities. In addition, all solid waste from the project will connect to existing sewer infrastructure within the public right of way.</p> <p>The project developer will be required to provide adequate space for solid waste and recycling bins, in compliance with applicable City Standards. A Construction Waste Management Plan will be prepared</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>and implemented to ensure that waste generated during construction is properly disposed, reused, or recycled, in accordance with the City of Moreno Valley's Municipal Code.</p> <p>Waste Management Services will provide ongoing solid waste disposal for the project. The project will comply with the following State mandates:</p> <ul style="list-style-type: none"> • AB 341 (2011): Mandatory commercial recycling. • AB 1826 (2014): Mandatory organic recycling. • AB 827: Requires clearly labeled organic and recycling containers for customers and tenant use. <p>Compliance with these programs will ensure that the project does not generate solid waste in excess of State and local standards or exceed the capacity of local waste management infrastructure. <i>Therefore, impacts related to solid waste would be less than significant.</i></p> <p>Wastewater</p> <p>The project is located within the Eastern Municipal Water District (EMWD) service area. In response to agency coordination, EMWD has not indicated any deficiencies in sewer capacity or conveyance infrastructure. The proposed project will connect to existing sewer infrastructure located within the Cottonwood Avenue public right-of-away.</p> <p>Given the project's density and EMWD's existing treatment capacity, the project is not anticipated to require expansion of existing wastewater treatment facilities or construction of new facilities. <i>Therefore, impacts related to wastewater would be less than significant.</i></p> <p>Stormwater</p> <p>Pursuant to Chapter 3.50 of the City of Moreno Valley Municipal Code, the project required to ensure all stormwater generated on-site is properly collected and conveyed to an adequate downstream system. A Preliminary Stormwater Control Plan (SWCP) was prepared for the project and identifies that stormwater runoff will be collected and directed into existing storm drain infrastructure along Cottonwood Avenue.</p> <p>The stormwater system is designed to prevent flooding, erosion, or downstream system overload, in accordance with City engineering standards.</p> <p><i>As such, impacts related to wastewater would be less than significant.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006 <ul style="list-style-type: none"> • Chapter 2 – Community Development Element • Chapter 4 – Parks, Recreation and Open Space Element • Chapter 6 – Safety Element • Chapter 9 – Goals and Objectives (Objective 2.8 and Objective 2.14) 2. Moreno Valley 2040 General Plan <ul style="list-style-type: none"> • Chapter 2 – Land Use and Community Character • Chapter 6 – Safety Element 3. California Department of Education, California Longitudinal Pupil Achievement Data System 4. Eastern Municipal Water District. (2020). Urban Water Management Plan. https://content.emwd.org/sites/default/files/2024-07/urbanwatermanagementplan_0.pdf 5. California Legislative Information- California Assembly Bill (AB) No. 341, approved October 5, 2011 6. California Legislative Information-California Assembly Bill (AB) No. 1826, approved September 28, 2014 7. California Legislative Information-California Assembly Bill (AB) No. 827, approved October 2, 2019 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>8. Title 3 – Revenue and Finance of the Moreno Valley Municipal Code- Section 3.50, National Pollutant Discharge Elimination System (NPDES)</p> <p>9. Title 3 – Revenue and Finance of the Moreno Valley Municipal Code - Section 3.38- Residential development impact fees</p> <p>Title 3 – Revenue and Finance of the Moreno Valley Municipal Code - Section 3.42- commercial and industrial development impact fees</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION – Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. Refer to Response XV(a). The proposed project is not expected to generate substantial new population growth or induce unplanned development within the City. Furthermore, the project applicant will be required to pay applicable development impact fees pursuant to Section 3.38.080 (Park Improvements Residential Development Impact Fees) and Chapter 3.40 (Dedication of Land for Park Facilities and Payment of In-Lieu Fees) of the Moreno Valley Municipal Code.</p> <p><i>Therefore, the project would not result in adverse impacts related to population growth or park infrastructure, and no impacts would occur.</i></p>				
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. Refer to Response XV(a). The proposed project includes on-site recreational amenities for residents but does not propose the construction or expansion of public parks or recreational facilities. As previously discussed, the project would not require the development or expansion of any public recreational facilities.</p> <p><i>Therefore, no impacts would occur.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006 <ul style="list-style-type: none"> • Chapter 4 – Parks, Recreation and Open Space Element – Section 4.3 – Parks and Recreation 2. Moreno Valley 2040 General Plan <ul style="list-style-type: none"> • Chapter 5 – Parks and Public Services 3. City of Moreno Valley Municipal Code <ul style="list-style-type: none"> • Section 3.38.080- Park Improvements Residential Development Impact Fees • Chapter 3.40 – Dedication of Land for Park Facilities and Payment of In Lieu Fees 				

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

XVII. TRANSPORTATION – Would the project:

a) Conflict with program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Response:

Less Than Significant Impact. The City of Moreno Valley adopted the *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled (VMT) and Level of Service (LOS) Assessment* in June 2020 in response to Senate Bill 743, which requires the use of VMT as the primary metric for analyzing transportation impacts under CEQA. This guide provides VMT screening criteria, methodologies, and thresholds for determining the significance of transportation impacts.

A VMT Scoping Form was prepared in 2024 to evaluate trips generation for the proposed project. The form calculated trip generation during both AM and PM peak hours. As shown in the Project Trip Generation Table below, the proposed development would generate approximately 74 AM peak hour vehicle trips and 94 PM peak hour vehicle trips, which are both below the City’s screening threshold of 100 peak hour trips. Based on these results, the project qualifies for LOS screening and does not require a full LOS analysis.

Table 1 - Project Trip Generation Table

	Existing Trip Generation			Proposed Trip Generation		
	In	Out	Total	In	Out	Total
AM Trips	-	-	-	18	56	74
PM Trips	-	-	-	59	35	94

Source: Appendix I – Project Scoping Form for Cottonwood Apartments, prepared by Kimely-Horn, 2024

Public Transit:

Public transportation in the project area is provided by the Riverside Transit Agency (RTA), which operates local and regional bus services. The project site is located within an urbanized area that is already served by existing transit routes. No changes to the transit network are proposed, and the project would not adversely affect public transportation facilities.

Bicycle and Pedestrian Facilities:

The City of Moreno Valley 2006 General Plan Circulation Element and the City of Moreno Valley 2040 General Plan Circulation Element identifies four classes of bikeways:

- **Class I:** Multi-use paths separated from roadways
- **Class II:** Striped bike lanes on roadways

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul style="list-style-type: none"> • Class III: Shared bike routes with vehicle traffic • Class IV: Protected bike lanes (Cycle Tracks), which provide right of way for bicycle travel within a roadway and are protected from vehicular traffic. <p>The project does not propose alterations to the existing bicycle or pedestrian infrastructure. These facilities are anticipated to remain consistent with existing conditions, and no conflicts with adopted plans or policies are expected.</p> <p><i>Therefore, impacts would be less than significant.</i></p>				
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) ?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. As of July 1, 2020, CEQA Guidelines Section 15064.3 requires that VMT to be used as a primary metric for evaluating transportation impacts, replacing the traditional LOS standard for land use projects. In response to this change, the City of Moreno Valley adopted the <i>Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment</i> in June 2020. This guide provides a methodology for conducting VMT analyses, screening criteria, and established VMT thresholds in compliance with Senate Bill (SB) 743.</p> <p>The project was evaluated through the City’s VMT Screening Analysis, which determined the following:</p> <p>The project would generate 94 vehicle trips during the peak hour, which is below the City’s screening threshold of 100 vehicle trips per peak hour. Projects below this threshold are considered to have a negligible effect on LOS and do not require further LOS analysis.</p> <p>The project is located within Low VMT Area, as identified by the City’s adopted screening maps and criteria. As such, the project qualifies for screening and is presumed to have less than significant impact on VMT.</p> <p>Because the project meets both the trip-generation and geographic screening criteria, no further VMT analysis is required. <i>Therefore, the project would not conflict with CEQA Guidelines Section 15064.3(b), and transportation impacts related to VMT would be less than significant.</i></p>				
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The project would not substantially increase hazards due to a design feature or incompatible uses. The project site is adjacent to an existing public roads and is accessed at locations with adequate site distance and properly controlled intersections.</p> <p>As part of the proposed project, roadway improvements are planned along both the north and south boundaries of the project. Along Cottonwood Avenue, the project is proposing to:</p> <ul style="list-style-type: none"> • Relocate the existing utilities, including electrical and drainage related utilities, • Construct a new curb opening for the main entrance to the project • Widen the existing roadway pavement to accommodate future traffic needs <p>On Patricia Lane, a curb cut provided to allow for emergency vehicle access, enhancing public safety and emergency response times.</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The proposed improvements are consistent with the City of Moreno Valley Engineering Standards and are depicted in Figure 3, Conceptual Site Plan, and the submitted project materials. The project does not include any land uses that are incompatible with the surrounding development and would not introduce unusual traffic types into residential areas.</p> <p><i>As such, the project would not create any unusual transportation safety hazards, and potential impacts would be less than significant impact.</i></p>				
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The proposed project has been designed to ensure adequate emergency vehicle access throughout the site. Ingress and egress points, turnaround areas, perimeter access roads, and interior roadways between development features (e.g., panel rows) would be constructed to meet minimum width and clearance requirements. With these features in place, emergency vehicles will be able to efficiently access and maneuver throughout the site in the event of an incident. These features will comply with applicable City of Moreno Valley and Riverside County Fire Department standards.</p> <p><i>Therefore, impacts related to emergency access would be less than significant.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006 <ul style="list-style-type: none"> • Chapter 5 Circulation Element 2. Moreno Valley 2040 General Plan <ul style="list-style-type: none"> • Chapter 4 Circulation Element 3. Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment, prepared by CalTrans in May, 2020 4. Appendix I - Project Scoping Form for Cottonwood Apartments, prepared by Kimely-Horn, 2024 5. Appendix J- Project Plans, 2025 6. City of Moreno Valley Engineering Standards 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVIII. TRIBAL CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k) , or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Response:

Less Than Significant with Mitigation Incorporated. A record search was conducted by the South Central Coastal Information Center (SCCIC) for this project site, located on the Shadow Mountain SE USGS 7.5-minute quadrangle. The records search encompassed the project area and a 1-mile radius, and included a review of:

- Previously recorded archaeological and built-environment resources;
- Cultural resource reports on file;
- Listings from the California Points of Historical Interest, California Historical Landmarks (CHL), California Register of Historical Resources (CAL REG), National Register of Historic Places (NRHP), and the California State Historic Properties Directory (HPD).

A portion of the project site has been previously surveyed. No archaeological or built-environment resources have been recorded within the project area. However, due to the potential for buried or previously unidentified cultural resources to be inadvertently discovered during ground-disturbing activities, mitigation is required to ensure impacts remain less than significant.

The City has identified specific required mitigation actions to protect tribal and cultural resources, which have been incorporated into **Mitigation Measures MM-CUL-1 through MM-CUL-9**. The proposed **Mitigation Measures, MM-CUL-1 through MM-CUL-9**, address the requested mitigation measures provided by Consulting Tribes, including the Pechanga Band of Mission Indians, the Yuhaaviatam of San Manuel Nation (YSMN), as stated in Appendix L - Yuhaaviatam of San Manuel Nation AB 52 Consultation Letter, July 7, 2025, as well as the requested mitigation measures provided by the Morongo Band of Mission Indians, as stated in Appendix M - Morongo Band of Mission Indians AB 52/SB 18 Consultation Letter, August 8, 2025. With the implementation of these measures, potential impacts related to tribal and cultural resources pursuant to CEQA Guidelines Section 15064.5 that may be inadvertently encountered during project grading would be reduced to a less than significant level.

Mitigation Measures

MM-CUL-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. The project Archaeologist shall have the authority to temporarily redirect earthmoving activities in the event that suspected archaeological resources are unearthed during project construction. The project Archaeologist, in consultation with the Consulting Tribes, the contractor, and the City, shall develop a CRMP as defined in MM-CUL-3. The project archaeologist shall attend the pre-grading meeting with the City, the construction manager and any contractors and will conduct a mandatory Cultural Resources Worker Sensitivity Training to those in attendance. The archaeological monitor shall have the authority to temporarily halt and redirect earth moving activities in the affected area in the event that suspected archaeological resources are unearthed.

MM-CUL-2 Native American Monitoring. Prior to the issuance of a grading permit, the Developer shall secure agreements with the Consulting Tribe, Pechanga Band of Mission Indians, 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 resources are unearthed. The Native American Monitor(s) shall attend the

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>pre-grading meeting with the project Archaeologist, City, the construction manager and any contractors and will conduct the Tribal Perspective of the mandatory Cultural Resources Worker Sensitivity Training to those in attendance.</p> <p>MM-CUL-3 Cultural Resource Monitoring Plan (CRMP). The project Archaeologist, in consultation with the Consulting Tribe(s), the contractor, and the City, shall develop a CRMP in consultation pursuant to the definition in AB52 to address the details, timing and responsibility of all archaeological and cultural activities that will occur on the project site. A consulting Tribe is defined as a Tribe that initiated the AB52 tribal consultation process for the project, has not opted out of the AB52 consultation process, and has completed AB52 consultation with the City as provided for in California Public Resources Code Section 21080.3.2(b)(1) of AB52. Details in the Plan shall include:</p> <ul style="list-style-type: none"> a. Project description and location. b. Project grading and development scheduling. c. Roles and responsibilities of individuals on the Project. d. The pre-grading meeting and Cultural Resources Worker Sensitivity Training details. e. The protocols and stipulations that the contractor, City, Consulting Tribe (s) and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation. f. The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items. g. Contact information of relevant individuals for the Project. <p>MM-CUL-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:</p> <ul style="list-style-type: none"> a. One or more of the following treatments, in order of preference, shall be employed with the tribes. Evidence of such shall be provided to the City of Moreno Valley Planning Department: <ul style="list-style-type: none"> i. Preservation-In-Place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place they were found with no development affecting the integrity of the resources. ii. Onsite reburial of the discovered items as detailed in the treatment plan required pursuant to Mitigation Measure CR-1. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed. No recordation of sacred items is permitted without the written consent of all Consulting Native American Tribal Governments as defined in 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. <p>MM-CUL-5. The City shall verify that the following note is included on the Grading Plan:</p> <p>"If any suspected archaeological resources are discovered during ground-disturbing activities and the Project Archaeologist or Native American Tribal Representatives are not present, the construction supervisor is obligated to halt work in a 100-foot radius around the find and call the Project Archaeologist and the Tribal Representatives to the site to assess the significance of the find."</p> <p>MM-CUL-6 Inadvertent Finds. If potential historic or cultural resources are uncovered during</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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, and shall be submitted to the City for their review and approval prior to implementation of the said plan.</p> <p>MM-CUL-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 consulting Tribe(s).</p> <p>MM-CUL-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).</p> <p>MM-CUL-9 Archeology Report – Phase III and IV. If required for the Project, prior to final inspection, the developer/permit holder shall prompt the Project Archeologist to submit two (2) copies of the Phase III Data Recovery report (if required for the Project) and the Phase IV Cultural Resources Monitoring Report that complies with the Community Development Department's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. The Community Development Department shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the Community Development Department shall clear this condition. Once the report(s) are determined to be adequate, two (2) copies shall be submitted to the South Costal Information Center (SCIC) at the San Diego State University (SDSU) and one (1) copy shall be submitted to each of the Consulting Tribe(s) Cultural Resources Department(s).</p> <p><i>With the incorporation of MM-CUL-1 to MM-CUL-9, which address all mitigation identified by the City, as well as all mitigation measures provided by the consulting tribes, including the Pechanga Band of Mission Indians, the Yuhaaviatam of San Manuel Nation, and the Morongo Band of Mission Indians, potential impacts on tribal and cultural resources will be less than significant.</i></p> <p><i>Implementation of mitigation measures MM-CUL-1 to MM-CUL-9 will reduce potential impacts to cultural and tribal cultural resources to a less than significant level, consistent with CEQA Guidelines Section 15064.5.</i></p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of 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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant with Mitigation Incorporated. While no Tribal Cultural Resources (TCRs) have been previously recorded within the project site, the area holds cultural significance to local Native American tribes. As such, in accordance with CEQA Guidelines Section 15064.5 and Public Resources Code Section 21074, the potential for inadvertent discovery of cultural or tribal cultural resources during ground-disturbing activities warrants implementation of mitigation measures.</p> <p><i>Implementation of mitigation measures MM-CUL-1 to MM-CUL-9, as described above, will reduce potential impacts to cultural and tribal cultural resources to a less than significant level, consistent with CEQA Guidelines Section 15064.5.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006 <ul style="list-style-type: none"> • Chapter 7 – Conservation Element – Section 7.2 – Cultural and Historical Resources 2. Moreno Valley 2040 General Plan <ul style="list-style-type: none"> • Chapter 10 – Open Space and Resource Conservation 3. Appendix C1 - Cultural Resources Assessment Update, prepared by BioCultural LLC August 2025 4. Appendix C2 - Cultural Resources Survey Report, prepared by CRM Tech September 2021 5. Cultural Historic Resources Information System (CHRIS), South Central Coast Information Center, California State University, Fullerton 6. Appendix L - Yuhaaviatam of San Manuel Nation AB 52 Consultation Letter, July 7, 2025 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Response:

Less Than Significant Impact. The proposed project would be served by existing utility providers and infrastructure. It does not include, nor does it require, the relocation or construction of new or expanded off-site utility facilities:

- **Water Supply:** The site is within the service area of the Eastern Municipal Water District (EMWD), which will provide potable water. No new or expanded water treatment or distribution facilities are required.
- **Wastewater and Stormwater:** EMWD will also provide wastewater treatment and stormwater drainage services. The project will connect to the existing systems, and no new or expanded off-site wastewater infrastructure is necessary.

Electric Power: Southern California Edison (SCE) will provide electricity to the project. No new or expanded off-site electrical facilities are required.

- **Natural Gas:** Southern California Gas Company (SoCalGas) will provide natural gas service. Existing infrastructure is adequate to support the project.
- **Telecommunications:** Telecommunication services (e.g., Spectrum, Verizon) are readily available in the area. Future tenants can select providers based on availability and preference, no infrastructure expansion is anticipated.

Because the project will utilize existing utility infrastructure and does not require major off-site improvements or expansions, impacts related to utilities and service systems would less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Response:

Less Than Significant Impact. The project will be served by the Eastern Municipal Water District (EMWD), which is the designated water purveyor for the project site. EMWD’s 2020 Urban Water Management Plan (UWMP) evaluates projected water supply and demand under normal, single-dry, and multiple dry year scenarios, and demonstrates that sufficient supplies are available to meet future demands within its service area.

The proposed project includes 184 apartment units, which would increase water demand. To conservatively estimate this demand, a per capita use rate of 176 gallons per day, as established in EMWD’s 2020 UWMP, was applied. As outlined in Section XIV, *Population and Housing*, the project would result in 288 additional residents at full occupancy.

Based on EMWD’s 2020 water use target of 176 gallons per capita per day, the 288 additional residents would generate a water demand of 50,688 gallons per day, equivalent to approximately 56.8 acre-feet per year (AFY).

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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This increase in demand is consistent with EMWD’s long range planning assumptions, and the UWMP confirms that sufficient water supplies exist to serve anticipated growth. The project would not require the construction or expansion of water treatment or distribution facilities.

Therefore, impacts related to water supply availability and infrastructure would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Response:

Less Than Significant Impact. Wastewater disposal is regulated under the Federal Clean Water Act and the State Porter-Cologne Water Quality Control Act. The Santa Ana Regional Water Quality Control Board (RWQCB) regulates wastewater discharges in Moreno Valley, including the project site, and implements the Clean Water Act and the Porter-Cologne Act by administering the NPDES, issuing water discharge permits, and establishing BMPs. The proposed project would receive wastewater conveyance services from EMWD. Municipal wastewater is delivered to one of EMWD’s five regional water reclamation facilities which treat 46 million gallons of wastewater per day (MGD) and currently treats approximately 43 MGD of wastewater at its four active regional water reclamation facilities.¹

Given the available capacities at EMWD wastewater treatment plants, it is anticipated that the EMWD has available capacity to accommodate the anticipated wastewater generated from the new residences developed onsite. Based on EMWD’s 2015 Wastewater Collection System Master Plan, EMWD’s wastewater generation criteria used for regional planning is a rate of 235 gallons per day (GPD) per residential unit. Therefore, the project would generate approximately 67,680 GPD.

The project, therefore, would generate about 67,680 gallons of wastewater per day (GPD) or 0.056 MGD. Since the project would only result in an increase of wastewater flows equal to 5.6 percent of current EMWD capacity, adequate capacity is available to serve the proposed project. In addition, the receipt of a “will serve” letter from EMWD; payment of standard wastewater connection fees; and payment of ongoing user fees would ensure that the project’s impacts on existing wastewater facilities are adequately offset.

Therefore, wastewater generated by the project can be adequately treated within existing infrastructure, and impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Response:

Less Than Significant Impact. Implementation of the project is anticipated to generate additional solid waste during the temporary, short-term construction phase, as well as the operational phase, but it would not be expected to result in inadequate landfill capacity. According to the City’s General Plan, the majority of solid waste generated within the City is disposed of at Badlands Sanitary Landfill, located at 31125 Ironwood Avenue in Moreno Valley. Two other landfills within the county of Riverside, El Sobrante Landfill and Lamb Canyon Landfill, also have the capacity to serve the City. According to the California

¹ Eastern Municipal Water District website. <https://www.emwd.org/wastewater-service>

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Department of Resources Recycling and Recovery (CalRecycle), the combined remaining capacity of these three landfills is approximately 178.8 million cubic yards.²</p> <p>CalRecycle's residential waste generation rates estimate a generation rate for 12.23 pounds of waste per household per day. Assuming 184 apartment units, the project would result in approximately 3,522 pounds of waste daily. Considering the capacity of the above-mentioned landfills, solid waste generated by the proposed project will be accommodated by the landfills and would not have a significant impact on local landfill capacity.</p> <p>All construction activities would be subject to conformance with relevant federal, State, and local requirements related to solid waste disposal. Specifically, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939), which requires all California cities to "reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible." The California Integrated Waste Management Act of 1989 requires that at least 50 percent of waste produced is recycled, reduced, or composted. The project would also be required to demonstrate compliance with the current Green Building Code, which includes design and construction measures that act to reduce construction-related waste through material conservation measures and other construction-related efficiency measures.</p> <p><i>With adherence to these requirements, impacts related to solid waste generation and landfill capacity would be less than significant.</i></p>				
<p>e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The proposed project would generate solid waste during both construction and operation. To ensure proper handling and diversion of waste, the project developer shall provide adequate on-site space and storage bins for both refuse and recyclables in compliance with Assembly Bill (AB) 2176, which mandates recycling of construction demolition waste.</p> <p>A Construction Waste Management Plan (CWMP) will be prepared in two phases:</p> <ol style="list-style-type: none"> 1) Construction Phase – detailing the sorting, reuse, recycling, or disposal of construction materials. 2) Operation Phase – outlining ongoing waste management, including refuse and recycling collection, consistent with County and State requirements. <p>The CWMP will be reviewed and enforced by the City of Moreno Valley in accordance with the City's Municipal Code. Compliance with these requirements will ensure that the project does not exceed landfill capacity or interfere with solid waste management services.</p> <p><i>Therefore, impacts related to solid waste generation and landfill capacity would be less than significant</i></p>				

² CalRecycle website. n.d. SWIS Facility Detail. <https://www2.calrecycle.ca.gov/SolidWaste/> .

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006 <ul style="list-style-type: none"> • 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 2. Moreno Valley 2040 General Plan <ul style="list-style-type: none"> • Chapter 6 – Safety Element • Chapter 10 – Open Space and Resource Conservation Element 3. EMWD’s 2015 Wastewater Collection System Master Plan 4. EMWD 2020 Urban Water Management Plan, https://content.emwd.org/sites/default/files/2024-07/urbanwatermanagementplan_0.pdf 5. California Department of Resources Recycling and Recovery (CalRecycle) 6. California Integrated Waste Management Act of 1989 (Assembly Bill 939) 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. The project site is located in a moderately developed urban area surrounded by existing residential and commercial uses. According to the California Department of Forestry and Fire Protection (CalFire) Fire Hazard Severity Zone Viewer,³ and the adopted State Responsibility Area Fire Hazard Severity Zone Maps,⁴ the site is not located within a Very High Fire Hazard Severity Zone.</p> <p>The proposed project would be required to comply with applicable fire safety regulations, including the provisions of the City of Moreno Valley Emergency Operations Plan, the Riverside County Multi-Jurisdictional Local Hazard Mitigation Plan, and the California Fire Code. These requirements include, but are not limited to, ensuring adequate emergency response. Furthermore, emergency access to and from the site would be maintained throughout construction activities.</p> <p><i>Therefore, no impact related to emergency response or evacuation plans would occur.</i></p>				
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant Impact. The project site is generally flat and does not contain areas with steep slopes. Furthermore, the project site is located within an urbanized area of the city, where the risk of wildland fire is relatively low. As previously noted, the proposed project would not situated within an identified Fire Hazard Severity Zone. Therefore, the proposed project would not significantly exacerbate wildfire risks due to slope, prevailing winds, or other factors, nor would it expose occupants to harmful pollutant concentrations from wildfire or the uncontrolled spread of fire.</p> <p><i>Therefore, the impacts would be less than significant.</i></p>				
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. The project site is located in a moderately developed area of the city and is in close proximity to existing electric power, natural gas, and telecommunications facilities. The proposed residential uses would not include any features that would exacerbate fire risk or result in temporary or ongoing environmental impacts. The project is designed to provide access to surrounding uses and ensure adequate access for emergency vehicles. Emergency access to the site would be maintained throughout construction.</p>				

³ CalFire. nd. Fire and Resource Assessment Program: FHSZ Viewer. <https://egis.fire.ca.gov/FHSZ/>

⁴ CalFire. 2007. Map of CalFire’s Fire Hazard Severity Zones in the Local Responsibility Area – Western Riverside County. https://osfm.fire.ca.gov/media/6754/fhszl_map60.pdf

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>Therefore, the project is not expected to exacerbate fire risk or lead to temporary or ongoing environmental impacts, and no impact would occur.</i></p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. The project site is relatively flat with no major changes in elevation, and there are no channels or creeks running through it. The site is not located within a flood hazard area. Additionally, there are no known landslides on the site, nor is it situated in an area at risk for landslides.</p> <p>Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, or impacts from runoff, post-fire slope instability, or drainage changes.</p> <p><i>No impact would occur.</i></p>				
<p>Sources:</p> <ol style="list-style-type: none"> 1. Moreno Valley General Plan, adopted July 11, 2006 <ul style="list-style-type: none"> • Chapter 6 – Safety Element – Section 6.2- Fire and Emergency Services – 6.2.8—Wildland Urban Interface 2. Moreno Valley 2040 Safety Element <ul style="list-style-type: none"> • Chapter 6 – Safety Element 3. CalFire. nd. Fire and Resource Assessment Program: FHSZ Viewer. https://egis.fire.ca.gov/FHSZ/ 4. CalFire. 2007. Map of CalFire’s Fire Hazard Severity Zones in the Local Responsibility Area – Western Riverside County. https://osfm.fire.ca.gov/media/6754/fhszl_map60.pdf 5. Appendix J- Project Plans, 2025 6. City of Moreno Valley Local Hazard Mitigation Plan, revised December 2022 7. County of Riverside Operational Area, Multi-Jurisdictional Local Hazard Mitigation Plan, prepared April 2023 8. City of Moreno Valley Emergency Operations Plan, prepared March 2009 				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Response:</p> <p>Less Than Significant with Mitigation Incorporated. The project does not have the potential to significantly degrade the overall quality of the region’s environment. It would not 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, 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.</p> <p>No historic or prehistoric resources have been identified on the project site based on field surveys conducted by CRM TECH in September 2021 and BioCultural LLC in August 2024. Additionally, no archaeological or paleontological resources have been recorded within the project area. However, to address the potential for inadvertent discoveries during project development, mitigation measures have been incorporated to ensure that any impacts to cultural or tribal cultural resources would be reduced to a less-than-significant level. These include the implementation of measures CUL-1 through CUL-9 for Cultural Resources and Tribal Cultural Resources.</p> <p>Impacts to noise levels resulting from construction and operation related activities will be reduced to less than significant level with the implementation of mitigation measures NOISE -1 through NOISE – 7, as identified in the Noise section.</p> <p>Similarly, impacts to biological resources resulting from inadvertent discoveries or construction related activities will be reduced to less than significant level with the implementation of mitigation measures BIO-1, BIO-2, and BIO-3, as identified in the Biological Resources section.</p> <p><i>With implementation of these mitigation measures, all potentially significant impacts would be reduced to a less than significant level.</i></p>				
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. The project does not have impacts that are individually limited but cumulatively considerable. When evaluated in the context of existing, past, and reasonably foreseeable future projects in the vicinity, the project does not have the potential to result in cumulatively considerable environmental impacts.</p> <p>As detailed in the environmental analysis sections above, the project would not result in any significant and unmitigable impacts in any environmental category. Additionally, the project site and surrounding area are served by planned or existing infrastructure that is adequate to support current and proposed land uses.</p>				

ISSUES & SUPPORTING INFORMATION SOURCES:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><i>Therefore, the project will not contribute to cumulative impacts beyond what has already been planned for in applicable land use and infrastructure planning documents.</i></p>				
<p>c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Response:</p> <p>No Impact. The project would not result in environmental effects that could cause substantial adverse impacts on human beings, either directly or indirectly. No such impacts have been identified through the technical studies prepared for this project, nor through review of relevant data sources or consultation with responsible and trustee agencies.</p> <p>All potential environmental impacts have been thoroughly evaluated and determined to be less than significant or less than significant with mitigation incorporated. None of the potential effects are considered individually significant or cumulatively considerable in terms of adverse impacts on the region, local community, or its residents.</p> <p>As part of this project's approval, the applicant will be required to comply with all applicable conditions of approval. These conditions are anticipated to further ensure that no adverse effects will result from construction activities or from initial or future land uses authorized by the project.</p> <p><i>Accordingly, no significant impacts related to human health and safety are expected to occur.</i></p>				

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