



June 2020 | Mitigated Negative Declaration

MORENO ELEMENTARY SCHOOL REPLACEMENT

Moreno Valley Unified School District

Prepared for:

Moreno Valley Unified School District

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viable career path.*

MITIGATED NEGATIVE DECLARATION

Pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code (PRC) Sections 2100 et seq.) and the State CEQA Guidelines (California Code of Regulations (CCR) Sections 15000 et seq.), the Moreno Valley Unified School District has completed this Mitigated Negative Declaration (MND) for the project described below based on the assessment presented in the attached Initial Study.

LEAD AGENCY: Moreno Valley Unified School District

PROJECT TITLE: Moreno Elementary School Replacement

PROJECT LOCATION: The proposed new school site is an 8.97-acre parcel, at 13700 Nason Street, in the east portion of Moreno Valley in Riverside County (Assessor Parcel Number [APN] 488-190-034).

PROJECT DESCRIPTION: Moreno Valley Unified School District is proposing to replace the existing Moreno Elementary School at 26700 Cottonwood Avenue with a new elementary school at 13636 Nason Street, about 0.5 mile southeast. The new 2-story elementary school would have approximately 77,000 square feet and 38 classrooms, and 5 portables for future expansion, and a built-out capacity for 950 Transitional Kindergarten through 5th grade students. The project also includes transferring 3 other school facilities (staff only) throughout the District.

After Moreno ES transfers to the new school on Nason Street, the Rainbow Springs operation would move from its current location to the existing Moreno ES at 26700 Cottonwood. The vacated Rainbow Springs facility would be divided into two facilities: west and parts of the south half would accommodate the District's Professional Development Department; east and part of the north half would be renovated into office and clerical workstations for the District Security Department from the District Main Office. Finally, District office space vacated by the District Security Department would be occupied by the some of the remaining District staff.

EXISTING CONDITIONS: The project consists of changes to a residential/agricultural parcel and 3 other District facilities: Nason Street parcel, Moreno Elementary School, Rainbow Springs, and District Main Office. The proposed school site at Nason Street is an 8.97-acre parcel comprised of land that is primarily vacant former agriculture land. Approximately 0.72 acre of the northwest corner has a single-family home, a garage, barn, and small citrus grove with approximately 20 trees.

The 33,244-sf Moreno Elementary School at 26700 Cottonwood Avenue serves about 483 students in grades Kindergarten through 5th. The school has a total of 45 full- and part-time staff.

DOCUMENT AVAILABILITY: The MND and supporting Initial Study for Moreno Elementary School Replacement are available for review on the MVUSD Website:
<https://www.mvusd.net/apps/pages/facilitiesprojects>

SUMMARY OF IMPACTS: The attached Initial Study was prepared to identify the potential project-related effects on the environment and to evaluate the significance of those effects. Based on the environmental analysis, the proposed project would have no impacts or less-than-significant environmental impacts related to the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Public Services
- Population and Housing
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Findings. It is hereby determined that, based on the information contained in the attached Initial Study, the proposed project, with mitigation measures for Air Quality, Geology and Soils, and Transportation impacts, would not have a significant adverse effect on the environment.



June 2020 | Initial Study

MORENO ELEMENTARY SCHOOL REPLACEMENT

Moreno Valley Unified School District

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- B. Cultural Resources Evaluation
- C. Geological and Environmental Hazards Assessment Report
- D. Geotechnical Investigation
- E. Preliminary Environmental Assessment Report
- F. Noise and Vibration Technical Analysis
- G. Traffic Impact Analysis

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
APN	Assessor's Parcel Number
AQMD	air quality management district
bgs	below ground surface
BMP	best management practices
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDE	California Department of Education
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CMP	congestion management program
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
cy	cubic yard
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DSA	Department of State Architect
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EMWD	Eastern Municipal Water District
EOP	emergency operations plan

Abbreviations and Acronyms

EPA	United States Environmental Protection Agency
FHSZ	fire hazard severity zone
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
HCM	Highway Capacity Manual
HVAC	heating, ventilating, and air conditioning system
L _{dn}	day-night noise level
L _{eq}	equivalent continuous noise level
LID	low-impact development
LOS	level of service
LRA	local responsibility area
LST	localized significance thresholds
MARB	March Air Reserve Base
mgd	million gallons per day
MND	mitigated negative declaration
MS4	municipal storm drain system
MT	metric ton
MVFD	Moreno Valley Fire Department
MVPD	Moreno Valley Police Department
MVUSD	Moreno Valley Unified School District
MWD	Metropolitan Water District of Southern California
ND	negative declaration
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O ₃	ozone
OEHHA	California Office of Environmental Health Hazards Assessment
PM	particulate matter
ppm	parts per million
PPV	peak particle velocity

Abbreviations and Acronyms

RPS	renewable portfolio standard
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SKRHCP	Stephen's kangaroo rat habitat conservation plan
SoCAB	South Coast Air Basin
SO _x	sulfur oxides
SRA	source receptor area (air quality)
SRA	state responsibility area (hazards, wildfire)
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
tpd	tons per day
V/C	volume-to-capacity ratio
VMТ	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WRF	water reclamation facility

Abbreviations and Acronyms

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1. Introduction

OVERVIEW

Moreno Valley Unified School District (MVUSD or District) is proposing to replace the existing Moreno Elementary School with a new elementary school on a different site. The proposed project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This initial study provides an evaluation of the potential environmental consequences associated with this proposed project.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA¹ and the State CEQA Guidelines.² CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and state agencies, boards, commissions, and special districts (such as school districts and water districts).

MVUSD is the lead agency for this proposed project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed project.

California Public Resources Code (PRC) § 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies..." In this case, MVUSD has found that an initial study is required to determine whether there is substantial evidence that construction and operation of the proposed project would result in environmental impacts. An initial study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.³

When an initial study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR;⁴ however, if all impacts are found to be less than significant or can be mitigated to a less-than-significant level, the lead agency can prepare an ND or MND that incorporates mitigation measures into the project.⁵

¹ California Public Resources Code, § 21000 et seq (1970).

² California Code of Regulations, Title 14, Division 6, Chapter 3, § 15000 et seq.

³ California Code of Regulations, Title 14, Division 6, Chapter 3, § 15063.

⁴ California Code of Regulations, Title 14, Division 6, Chapter 3, § 15064.

⁵ California Code of Regulations, Title 14, Division 6, Chapter 3, § 15070.

1. Introduction

Environmental Process

A “project” means the whole of an action that has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

1. An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code §§ 65100-65700.
2. An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
3. An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.⁶

The proposed actions by MVUSD constitute a “project” because the activity would result in a direct physical change in the environment and would be undertaken by a public agency. All “projects” in the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the project.

Initial Study

This initial study was prepared in accordance with CEQA and the CEQA Guidelines, as amended, to determine if the project could have a significant impact on the environment. The purposes of this initial study, as described in the State CEQA Guidelines § 15063, are to 1) provide the lead agency with information to use as the basis for deciding whether to prepare an EIR or ND; 2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for an ND; 3) assist the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; 5) provide documentation of the factual basis for the finding in an ND that a project will not have a significant effect on the environment; 6) eliminate unnecessary EIRs; and 7) determine whether a previously prepared EIR could be used with the project. The findings in this initial study have determined that an MND is the appropriate level of environmental documentation for this project.

Mitigated Negative Declaration

The MND includes information necessary for agencies to meet statutory responsibilities related to the proposed project. State and local agencies will use the MND when considering any permit or other approvals necessary to implement the project. A preliminary list of the environmental topics that have been identified for study in the MND is provided in the Initial Study Checklist (Chapter 2).

⁶ California Code of Regulations § 15378(a).

1. Introduction

One of the primary objectives of CEQA is to enhance public participation in the planning process because public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request to be notified, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the District. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and public meetings.

IMPACT TERMINOLOGY

The following terminology is used to describe the level of significance of impacts.

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.
- An impact is considered ***less than significant*** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered ***less than significant with mitigation incorporated*** if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.
- An impact is considered ***potentially significant*** if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR would need to be prepared.

ORGANIZATION OF THE INITIAL STUDY

The content and format of this report are designed to meet the requirements of CEQA and the State CEQA Guidelines. The conclusions in this initial study are that the proposed project would have no significant impacts. This report contains the following sections:

Chapter 1, *Introduction*, identifies the purpose and scope of the MND and supporting Initial Study and the terminology used.

Chapter 2, *Environmental Setting*, describes the existing conditions, surrounding land uses, general plan designations, and existing zoning at the school and surrounding area.

Chapter 3, *Project Description*, identifies the location, background, and describes the proposed project in detail.

Chapter 4, *Environmental Checklist*, has the CEQA checklist and the significance finding for each resource topic.

Chapter 5, *Environmental Analysis*, provides an evaluation of the impact categories and a response to questions contained in the CEQA checklist. Bibliographical references and individuals cited for information sources and technical data are footnoted throughout this CEQA Initial Study; therefore a stand-alone bibliography section is not required.

1. Introduction

Chapter 6, *List of Preparers*, identifies the individuals who prepared the MND and supporting Initial Study and technical studies and their areas of technical specialty.

Appendices have data supporting the analysis or contents of this CEQA Initial Study.

- A. Air Quality and Greenhouse Gas Emissions Technical Analysis
- B. Cultural Resources Evaluation
- C. Geological and Environmental Hazards Assessment Report
- D. Geotechnical Investigation
- E. Preliminary Environmental Assessment Report
- F. Noise and Vibration Technical Analysis
- G. Traffic Impact Analysis Report

2. Environmental Setting

2.1 PROJECT LOCATION

The proposed project consists of changes to the project site and three District facilities: Moreno Elementary School, Rainbow Springs special education facility, and the District Main Office (see Figure 1, *Regional Location*, and Figure 2, *Local Vicinity*). The 8.97-acre school site is at 13700 Nason Street (Assessor's Parcel Number [APN] 488-190-034) in the central portion of Moreno Valley in Riverside County. Regional access to the site is from State Route 60 (Moreno Valley Freeway) to Nason Street 1.2 miles north. Currently, Moreno Elementary School is at 26700 Cottonwood Avenue; Rainbow Springs is at 23990 Eucalyptus Avenue; and the District Main Office building is at 25634 Alessandro Boulevard.

2.2 SURROUNDING LAND USE

As shown on Figure 3, *Surrounding Land Uses*, the new school site is bordered by the following land uses:

- **North:** The Lord of Life Lutheran Church (5.2 acres: 2.5 acres developed and 2.7 acres vacant) and three large residential parcels along Cottonwood Avenue.
- **East:** 14-acre vacant parcel (previous agriculture) with Nicolas Nursery in the northeast corner.
- **South:** Bay Avenue and Moreno Christian Assembly and residential.
- **West:** Nason Street and a 93-acre vacant parcel (previous agriculture). A large residential lot is at the southwest corner of Nason Street and Cottonwood Avenue.

2.3 EXISTING CONDITIONS

2.3.1 New Elementary School Site

The 8.97-acre parcel is residential and vacant land (Figure 4, *Aerial Photograph – Proposed Moreno ES Site*). The northwest corner (0.72 acre) has a single-family home, garage, barn, and small citrus orchard with approximately 20 trees (a fraction of the previous 8-acre orchard). The home was built in 1942 and is associated with the Lantz family, who have owned it since 1955.⁷ It was owned by Carl Walfred Lantz, the son of pioneer farmer Carl Oscar Lantz, who planted several orchards in the area. C. W. Lantz was not the first owner of the home, and it appears that the property was frequently rented to tenants. Although the Lantz family was prominent in the Moreno Valley area as farmers and landowners, the house itself is not the most representative of the family's

⁷ PlaceWorks. 2019 April. Preliminary Environmental Assessment. Proposed Moreno Valley Elementary School-Nason Street for Moreno Valley Unified School District.

2. Environmental Setting

residence in the area. The original Lantz family homestead was built in 1900 following a fire, in the 12000 block of Nason Street north of SR-60.⁸

A buried structure that may be a water well is located in the extreme northwest corner of the site next to Nason Street. Another buried structure is at the east-central part of the single-family residential site. A windmill was once in the center of the citrus grove (since removed). Short concrete standpipes and irrigation lines are in the northern portion of the property adjacent to the property line. A masonry block wall approximately six feet in height runs along a portion of the northern property line. A small outbuilding is adjacent to the property line immediately southeast of the church site. The area topography is generally flat, and the site slopes downward to the south at an average gradient of approximately 2 percent. Total relief across the site is approximately 16 feet.⁹

2.3.2 Moreno Elementary School

The 9-acre, 33,244-square-foot K-5 elementary school at 26700 Cottonwood Avenue (APN 487-370-014) was built in 1966 and was most recently modernized in 2004.¹⁰ The school serves about 483 students in grades kindergarten through 5th and has a total capacity of 750 students.¹¹ The school has a total of 45 full- and part-time staff (includes 30 teachers) (see Figure 4, *Aerial Photograph – Existing Moreno Elementary School*).

The campus has 7 permanent buildings (administration building; multipurpose and food service building; 4 classroom buildings; library building) and 20 portable buildings (15 classrooms, a library, 2 pull-out program spaces, storage, and a restroom). The campus has a total of 32 classrooms and includes a lunch shelter, a turf playfield, two hardcourt areas, and three playgrounds. Vehicular access to the campus is via three driveways on Cottonwood Drive. One driveway has a two-way access for the east parking lot (31 spaces). The other two driveways are one-way ingress and egress and provide access to the drop-off/pick-up lane, a 20-space lot, and a bus-only lane. The school operates on a traditional two-semester academic calendar, with students in session from August through June. School hours are:

- 7:45 am–2:10 pm Kindergarten
- 8:00 am–12:05 pm SDC¹²/Transitional Kindergarten¹³
- 10:20 am–11:00 am Transitional Kindergarten
- 8:00 am–2:25 pm Grades 1–5

⁸ ASM Affiliates. 2019, April 26. Cultural Resources Evaluation Letter Report for the Proposed Elementary School at Nason Street and Bay Avenue, City of Moreno Valley, Riverside County, California

⁹ John R. Byerly Incorporated. 2019, November 22. Geotechnical Investigation New Elementary School Northeast Corner of Nason Street and Bay Avenue Moreno Valley California.

¹⁰ Moreno Valley Unified School District. 2013 / 2014 Facilities Master Plan. 2013, September 12.
<https://1.cdn.edl.io/q0GL2JDkPNJnffjib1XJ75GWWazm38TlbdZTJISjg7SKsCLq.pdf>

¹¹ Latest Data Available from California Department of Education. 2018-2019 Enrollment by Grade, Moreno Elementary School Report. <https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=33671246032320&aggllevel=School&year=2018-19>

¹² SDC = Special Day Class

¹³ Transitional Kindergarten (TK) is for children who turn five between Sept. 2 and Dec. 2 and acts as a bridge between preschool and kindergarten.

2. Environmental Setting

2.3.3 Rainbow Springs

The District-owned three-acre Rainbow Springs is a special education program at 23990 Eucalyptus Avenue with about 300 children from birth to kindergarten age and 70 full- and part-time staff. The Infant Program is for birth to three years and Preschool Program for three- to five-year-old children (see Figure 5, *Aerial Photograph – Existing Rainbow Springs*). Rainbow Springs has about 22,000 square feet of space in four building groups (22 portable buildings):

- Group #1 Administration and 2 classrooms
- Group #2 9 classrooms
- Group #3 Workrooms, food service, and restrooms
- #4 2 shade structures
- Group #5 5 classrooms

The front of the campus has a drop-off/pick-up area and a 24-space parking lot, and the back has a 69-space parking lot.

2.3.4 District Main Office

The 35,000-square-foot District Main office building at 25634 Alessandro Boulevard houses operational staff for the school district. Approximately 60 employees work in this building (see Figure 6, *Aerial Photograph – Existing District Office*).

The first floor houses the board room and district administrative offices, and the second floor has administrative offices, including district security department employees.

2.4 GENERAL PLAN AND EXISTING ZONING

Zoning designation. The site is zoned R3 (Residential 3 District).¹⁴ The primary purpose of the R3 zoning is to provide a transition between rural- and urban-density development areas and to provide for a suburban lifestyle on residential lots larger than those commonly found in suburban subdivisions. This zone has a maximum allowable density of three dwelling units per acre.¹⁵ Schools are conditionally allowed.

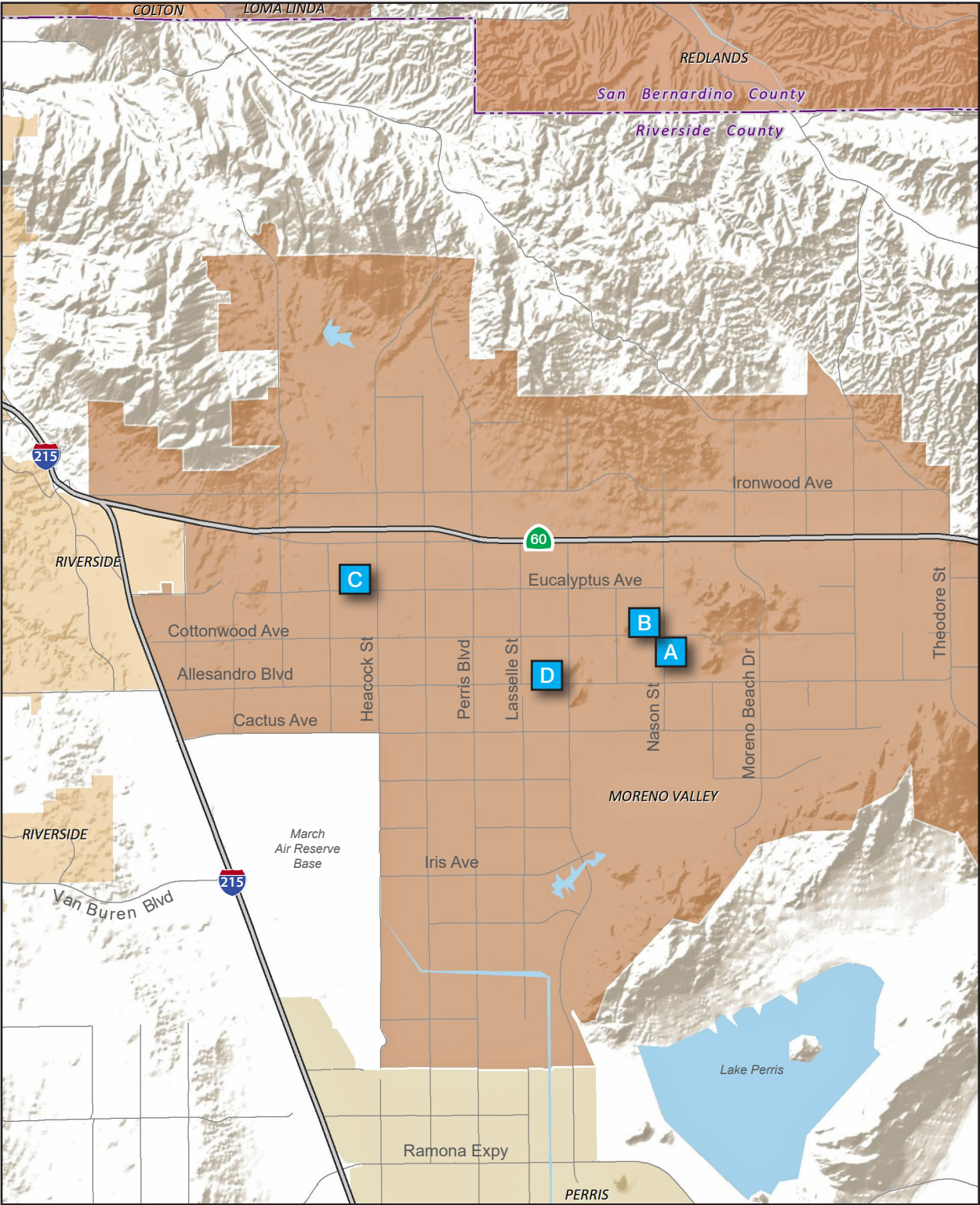
General Plan land use designation. The site has a land use designation of Residential (R3).¹⁶

¹⁴ City of Moreno Valley Zoning Map. 2019, October 10. <http://www.moreno-valley.ca.us/cdd/pdfs/ZoningMap.pdf>

¹⁵ Moreno Valley Municipal Code. <https://qcode.us/codes/morenovalley/>

¹⁶ Moreno Valley General Plan, Adopted Land Use Map. 2019, October 10. http://www.moreno-valley.ca.us/city_hall/general-plan/landuse-map.pdf

Figure 1 - Regional Location
2. Environmental Setting



- A** Project Site (Relocated Moreno Elementary School)
- B** Existing Moreno Elementary School
- C** Existing Rainbow Springs
- D** Existing District Main Office

Note: Unincorporated county areas are shown in white.
Source: ESRI, 2020

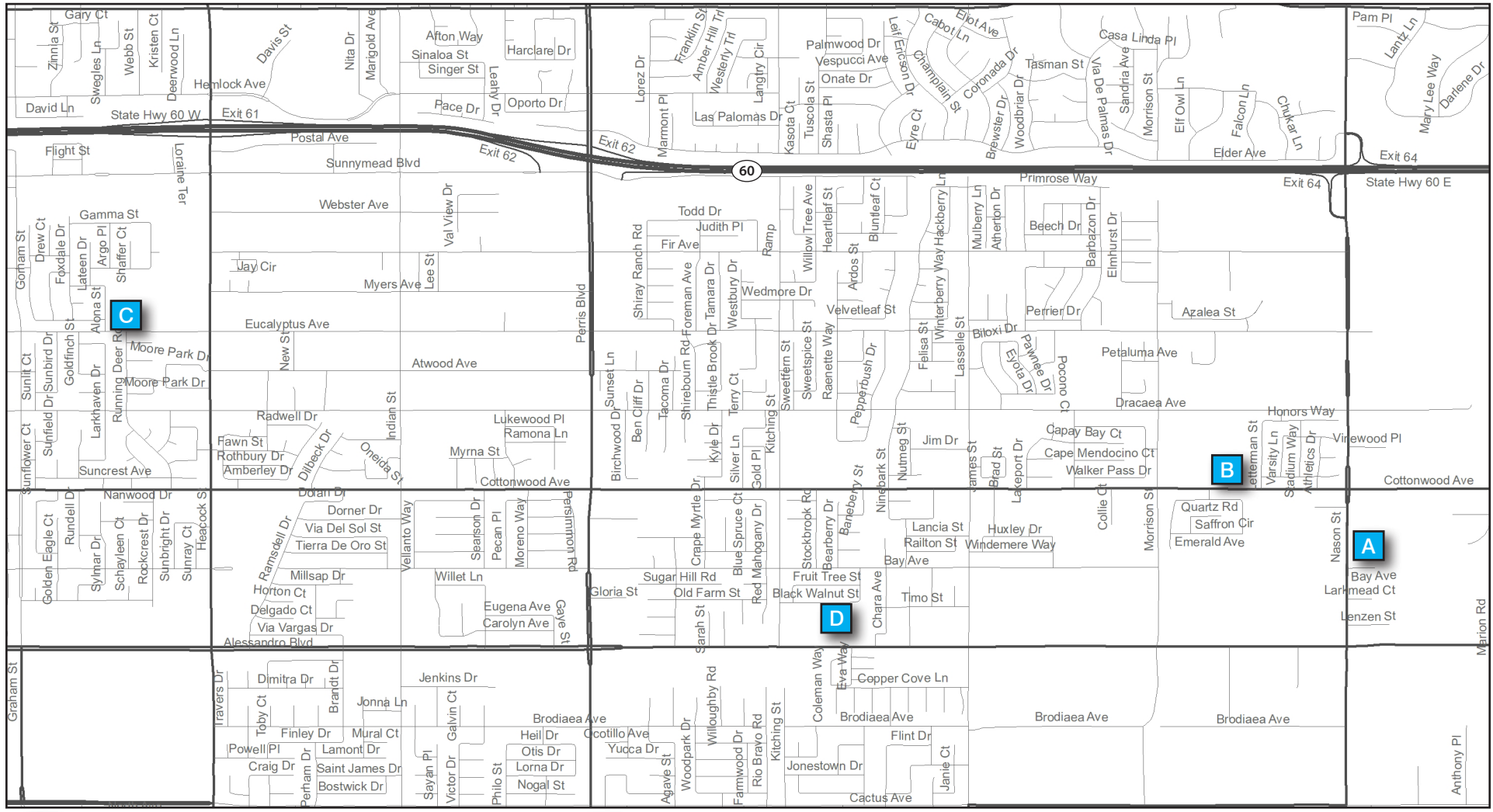
0 1.5
Scale (Miles)



2. Environmental Setting

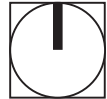
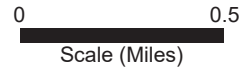
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Figure 2 - Local Vicinity
2. Environmental Setting



- A** Project Site (Relocated Moreno Elementary School)
- B** Existing Moreno Elementary School

- C** Existing Rainbow Springs
- D** Existing District Main Office



Source: ESRI, 2020

2. Environmental Setting

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Figure 3 - Surrounding Land Uses
2. Environmental Setting



2. Environmental Setting

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Figure 4 - Aerial Photograph - Proposed Moreno Elementary School Site
2. Environmental Setting



Source: Nearmap, 2020

2. Environmental Setting

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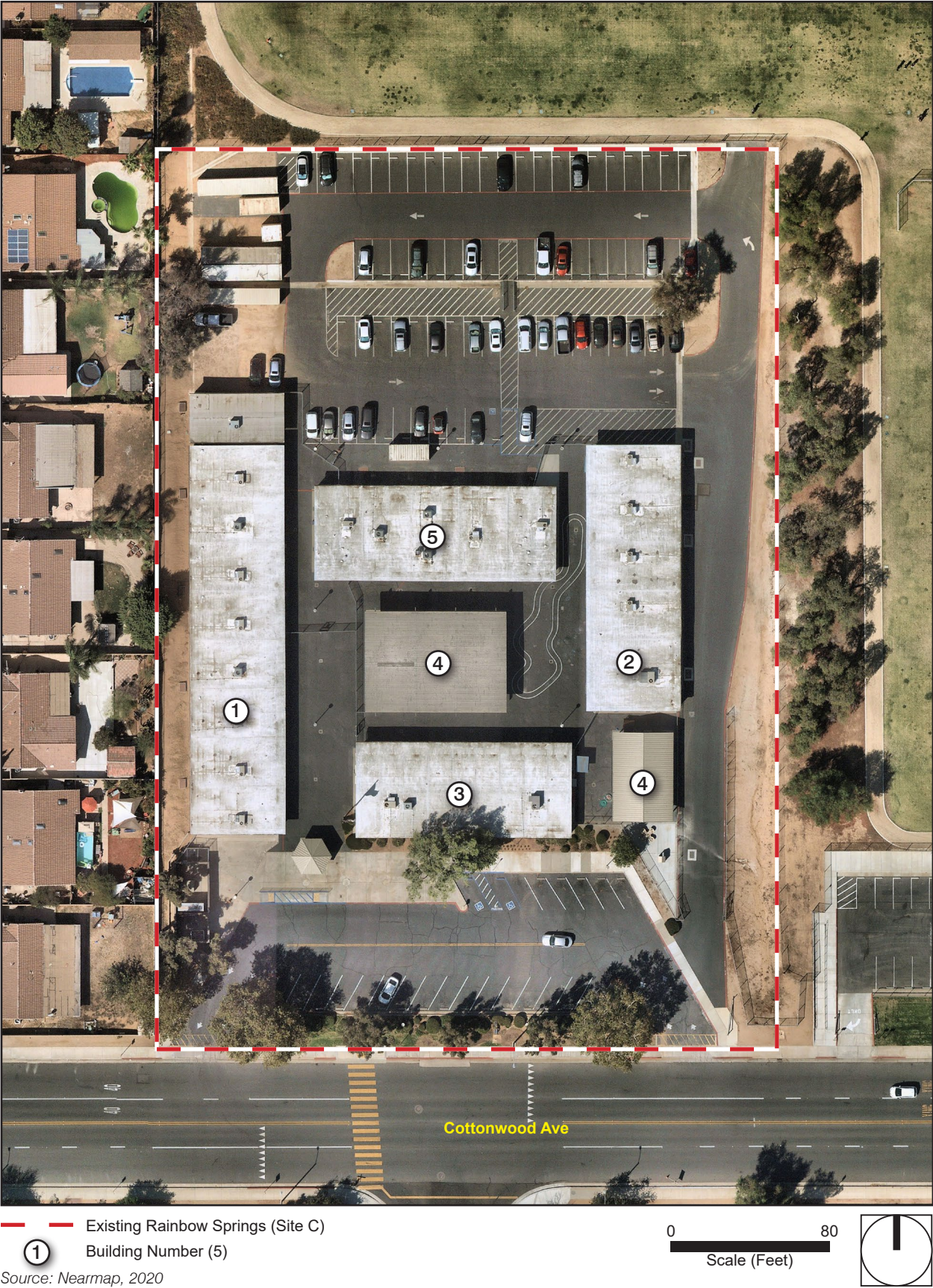
Figure 5 - Aerial Photograph - Existing Moreno Elementary School
2. Environmental Setting



2. Environmental Setting

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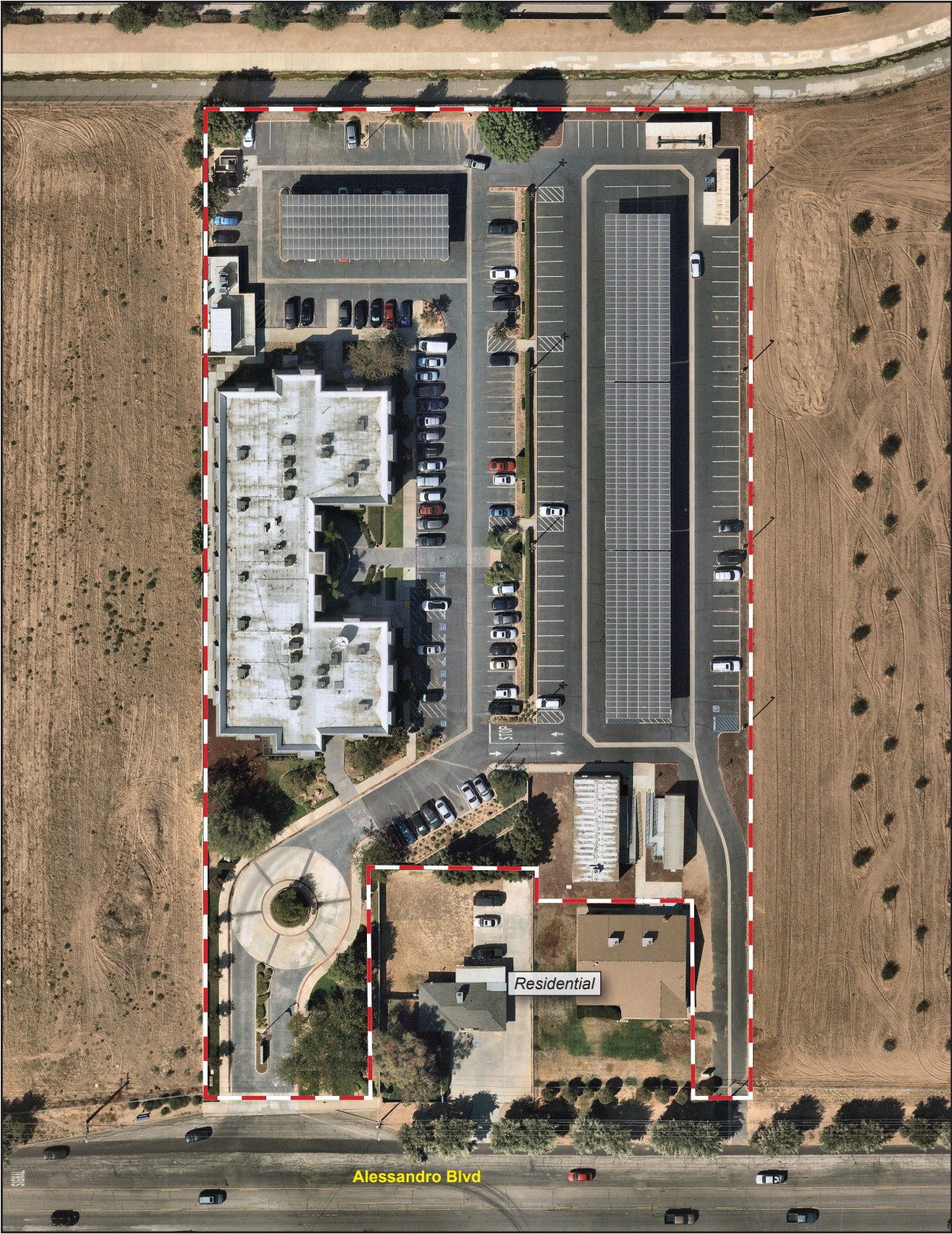
Figure 6 - Aerial Photograph - Rainbow Springs
2. Environmental Setting



2. Environmental Setting

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Figure 7 - Aerial Photograph - District Office
3. Project Description



— District Office (Site D)

0 100
Scale (Feet)



Source: Nearmap, 2020

3. Project Description

3.1 PROPOSED PROJECT

The proposed project consists of relocating the Moreno ES to a new school campus and transferring other facilities throughout the District. The project involves several components, as described below.

3.1.1 New Elementary School (future Moreno Elementary School)

The new school would be about 0.5 mile southeast of the existing school (0.4 mile from nearest lot lines and 0.6 mile between drop-off zones).

The new 8.97-acre elementary school would accommodate existing and future long-term planned residential development in Moreno Valley and overcrowding relief for other schools, with space for up to 950 students. The 483 students at the existing elementary school (Site B on Figure 2) would transfer to the new elementary school (Site A). The campus would have a 77,000-square-foot, 2-story building; hardscape (walkways and hardcourts); parking lots; playgrounds; and turf playfields (see Figure 8, *Conceptual Site Plan*). The building would be approximately 30 feet tall and would include the following spaces.

- 38 classrooms and support spaces in permanent building
 - First floor, 29 classrooms (5 kindergarten, 4 special education, 20 general classrooms) along with music, art, TK, collaboration/project space, and miscellaneous support spaces
 - Second floor: 9 classrooms, 1 special education classroom, and 1 collaboration space and miscellaneous support spaces
- Space for 5 future portable classrooms for expansion (950 student master plan buildout includes these students)
- Multipurpose / gymnasium
- Food services
- Administration
- Library
- 2 basketball courts
- Overlapping 2 baseball fields / 2 soccer fields
- Hardcourt play areas
- Kindergarten playground
- Lunch shelter
- Landscape, hardscape, and fencing

3. Project Description

Parking, Circulation, and Access

Nason Street would be improved with curb, gutter, sidewalk, landscaping, and a 150-foot-long curb cut for a new bus stop (Riverside Transit Agency).

Bay Avenue would be widened by 30 feet along the property frontage, from the intersection of Nason Avenue to 630 linear feet east. The main campus entry would be accessed from Bay Avenue to the south via one-way drive aisles. A one-way student drop-off/pick-up lane would be along the front of the school. Vehicles would enter the south driveway and exit using the west driveway onto Nason Street.

School bus drop-off and pick-up would be provided off Nason Street on the north side of the school. Parking consists of about:

- 50-space staff parking lot in the north campus
- 40-space visitor parking lot in front of the school (west campus)

Drainage

The southeast corner of the campus would serve as a 11,000-square-foot biofiltration detention basin for the school campus. Stormwater would flow to the basin and would draw down slowly and drain into underground storm drains in Nason Street. It would be designed and constructed in compliance with County of Riverside water quality regulations.

Lighting

The parking lots, walkways, and buildings would have security lights. All lights would be shielded to avoid light spill onto adjacent properties to the north and east. The play fields would not have nighttime lighting.

Operation

Traditional School. The new school campus would have a long-term maximum capacity of 950 students and about 75 full- and part-time staff. The school would operate on a traditional two-semester academic calendar, with students in session from August through June. School hours would be the same as the existing Moreno ES.

School-Related Events. The existing school currently has after-school programs for the students, such as special-interest clubs, and extracurricular activities that end later than 2:25 pm. There are also occasional nighttime and weekend events during the school year. Some of these events would be campus-wide, such as school plays and open houses; others would be grade specific, such as commencement; and others would be District-related, such as professional training workshops. Although most events are held inside, if outdoor areas are used for events after dark, temporary portable lights would be used.

3. Project Description

Community Use. In compliance with the Civic Center Act,¹⁷ the campus is available for community use at selected times when not in use by the school or MVUSD. The new elementary school would have the same use policies as the existing school.

3.1.2 New Rainbow Springs

After Moreno Elementary School transfers to the new location at Nason Street / Bay Avenue, the Rainbow Springs operation would move from its current location to the existing Moreno ES at 26700 Cottonwood.

The interior of the existing Moreno ES would be renovated to accommodate up to 300 students from birth to five years that currently attend Rainbow Springs. The 9 portable buildings (8 classrooms and a restroom building) in the southeast corner and 7 permanent and 12 portable classroom buildings would serve Rainbow Springs students.

All permanent and portable buildings would be repurposed with interior improvements to accommodate the various special education programs. The exterior of the buildings would remain the same. The repurposed facility would operate from 7:00 am to 4:30 pm, Monday through Friday. There are no special night or weekend events anticipated at the facility. Circulation for all staff and students would come from Cottonwood Avenue via existing driveways.

3.1.3 District Security Office

The vacated, 23,000-square-foot Rainbow Springs facility would be divided into two facilities: west and parts of the south half would accommodate the District's Professional Development Department; east and part of the north half would be renovated into office and clerical workstations for the District Security Department from the District Main Office. Building exteriors, parking lots, asphalt areas, and landscape would remain the same.

3.1.4 District Main Office

Three hundred square feet of District office space would be vacated by the District Security Department (20 of the 60 District employees) and occupied by some of the 40 remaining District staff. The additional space would permit the District to make more efficient use of the facility.

¹⁷ CA Education Code §§ 38130–38139.

3. Project Description

As shown in Table 1, all project component locations would have a reduction in use except the proposed Nason Street school site (Site A).

Table 1 Project Components

Site	Existing				Proposed			Occupancy Net Change
	Facility	Location	Use	Occupancy	Facility New Use	Use Type	Occupancy	
A	Residential (vacant)	NE corner of Nason Street & Bay Avenue	House, garage, barn, former citrus grove	0 residents	New Moreno Elementary School	Public School: Kindergarten to 5th grade	950 students	+ 950
B	Moreno Elementary School	26700 Cottonwood Avenue	Public School: Kindergarten to 5th grade	483 students + 70 staff	Rainbow Springs	Special Education Facility (Rainbow Springs - Birth to 5 yrs.	(Rainbow Springs: 300 students + 70 staff	-553 + 370 = (-183)
C	Rainbow Springs	23990 Eucalyptus Avenue	Special Education: Birth to 5 yrs.	300 students + 70 staff	District Security Department	Office	Office: 20 employees	-370 + 20 = (-350)
D	District Main Office	25634 Alessandro Boulevard	District Main Office, Security Department	Office: 40 employees Security Department: 20 employees	District Main Office	Office	Office: 40 employees	260 - 280 = (-20)

3.2 CONSTRUCTION SCHEDULE

Project construction is anticipated to start in the third quarter of 2020 (Q3-2020) and be completed in Q1-2022 (about 18 months).

- Site clearance and preparation would consist of demolition of buildings and vegetation removal. The house, barn, and garage are about 3,000 square feet.
- Rough grading and utility trenching would be followed by fine grading. To ensure clean soil is brought in, 10,000 cubic yards (cy) of soil import would be hauled to the site from one of the District's other school sites. A total of 130,000 cy of earth movement would occur on the site. Maximum depth of trenching for storm drains and sewers would be about 20 feet. The maximum over-excavation and compaction depth for both sites would be about 6 feet. No soil export is required.
- Construction of buildings, parking lots, asphalt hardcourts, playgrounds, concrete walkways, Bay Avenue widening, and curbs and driveways would add about 233,000 square feet of impermeable surfaces to the mostly permeable site.
- Finishing work and installation of landscape and turf fields.

3. Project Description

Following construction and occupation by students, the other components of the project would ensue. Construction activities associated with the other components consist of minor building improvements to accommodate the new uses. No heavy construction equipment would be used.

3.3 LEAD AGENCY

The MVUSD is the lead agency under CEQA and has approval authority over the proposed project. The project-related MND must be adopted by the Board of Education, confirming its adequacy in complying with the requirements of CEQA. The Board would consider the information in the MND in deciding to approve or deny the proposed project. The analysis is intended to provide environmental review for the whole of the proposed project, including the planning of the project; clearance, excavation, and grading of the site; construction of buildings; ongoing operation; and the foreseeable future consequences of each occupancy transfer.

3.4 ANTICIPATED AGENCY ACTIONS

It is the intent of this CEQA document to enable the District and responsible agencies to evaluate the environmental impacts of the proposed project, thereby enabling them to make informed decisions with respect to the requested entitlements, permits, or approvals. Agency actions are identified in Table 2.

3. Project Description

Table 2 Anticipated Agency Actions

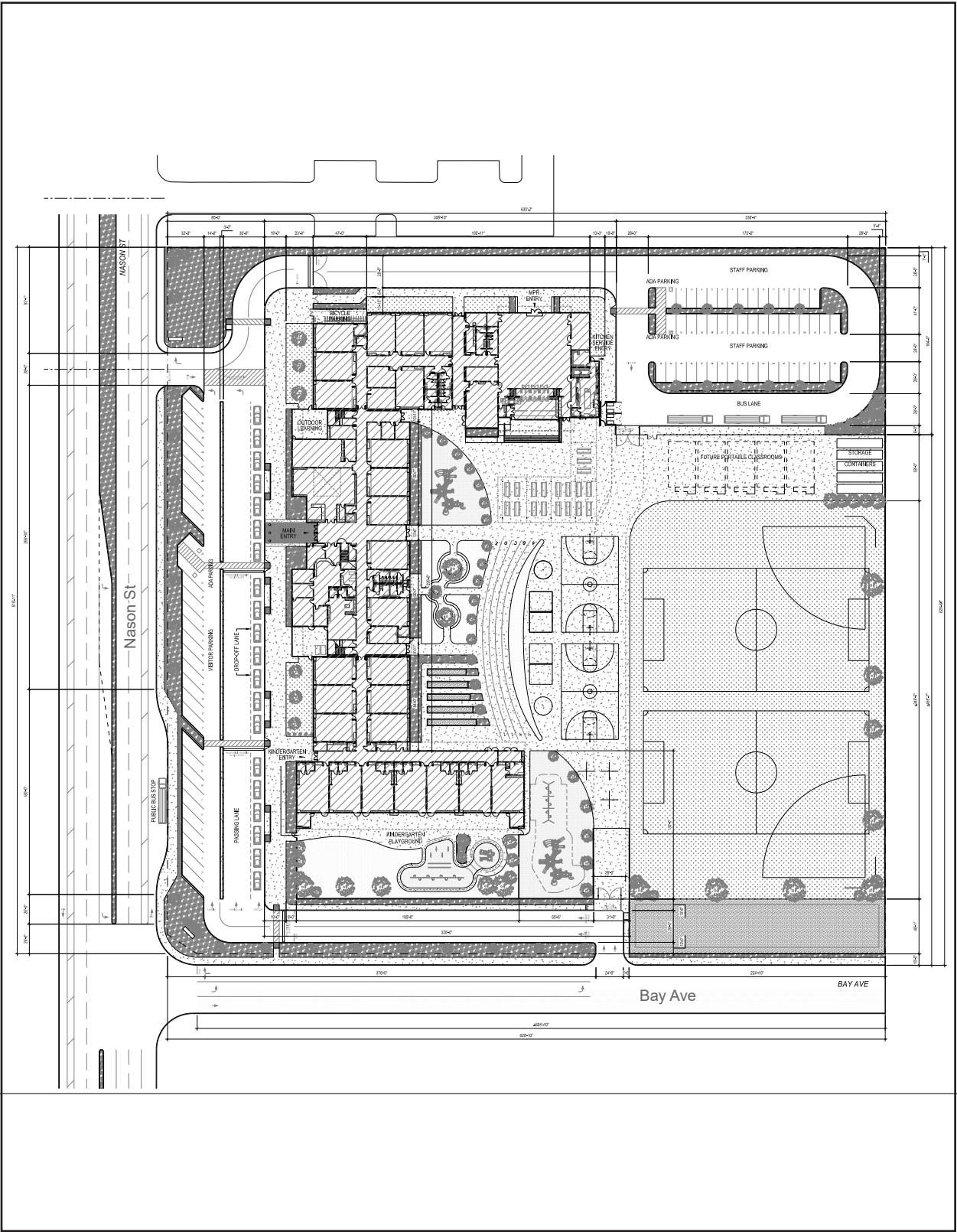
Lead Agency	Discretionary Action
Moreno Valley Unified School District	Adoption of the MND and Mitigation Monitoring and Reporting Program
	Approval of the Project
Reviewing Agency ¹⁸	Action
City of Moreno Valley Fire Department	Approval of plans for emergency access and emergency evacuation. DSA approval of the fire/life safety portion of a project requires local fire authority (LFA) review of: elevator/stair access for emergency rescue and patient transport; access roads, fire lane markings, pavers, and gate entrances; fire hydrant location and distribution; and fire flow (location of post indicator valve, fire department connection, and detector check valve assembly).
City of Moreno Valley Public Works Department	Permit for curb, gutter, and other off-site improvements. Approval of construction-related haul route.
California Department of General Services, Division of State Architect (DSA)	Plan review and construction oversight, including structural safety, fire and life safety, and access compliance.
California Department of Education, School Facilities Planning Division (CDE)	If MVUSD is requesting funds from the State Allocation Board (SAB), it must have the plans reviewed and approved by the CDE (Education Code § 17070.50) prior to submitting a funding request. Approval of design for educational appropriateness.
Santa Ana Regional Water Quality Control Board (SARWQCB)	Issue National Pollution Discharge Elimination System (NPDES) permit; Clean Water Act § 401 Water Quality Certification.
State Water Resources Control Board (SWRCB)	Review of Notice of Intent to obtain permit coverage; issuance of general permit for discharges of stormwater associated with construction activity; review of Storm Water Pollution Prevention Plan (SWPPP).
South Coast Air Quality Management District	Review and file submittals for Rule 403-Fugitive Dust; Rule 1403-Asbestos Emissions from Demolition/Renovation Activities.

¹⁸ 14 CCR § 15381. “Responsible Agency” means a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term “Responsible Agency” includes all public agencies other than the Lead Agency which have discretionary approval power over the project. Reviewing Agencies include those agencies that do not have discretionary powers over the proposed project, but that may 1) review the EIR for adequacy and accuracy; 2) issue ministerial approvals or permits.

2. Environmental Setting

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Figure 8 - Conceptual Site Plan
3. Project Description



0 500
Scale (Feet)



3. Project Description

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4. Environmental Checklist

PROJECT INFORMATION

1. **Project Title:** Moreno Valley Elementary School Replacement

2. **Lead Agency Name and Address:**

Moreno Valley Unified School District
23301 Dracaea Avenue
Moreno Valley, CA 92553

3. **Contact Person and Phone Number:**

John S. Nichols, Facility Planner
(562) 997-7550

4. **Project Location:** The proposed school site is an 8.97-acre parcel, at 13700 Nason Street, in the city of Moreno Valley in Riverside County (Assessor Parcel Number 488-190-034).

5. **Project Sponsor's Name and Address:**

Moreno Valley Unified School District
23301 Dracaea Avenue
Moreno Valley, CA 92553

6. **General Plan Designation:** Residential

7. **Zoning:** R3 (Residential 3 District)

8. **Description of Project:**

Moreno Valley Unified School District is proposing to replace the existing Moreno Elementary School with a new elementary school on a site one block to the southeast on Nason Street and transferring other facilities throughout the District. The new 8.97-acre Nason Street elementary school would have an approximately 77,000-square-foot, two-story building; hardscape (walkways and hardcourts); parking lots; playgrounds; and turf playfields. After Moreno Elementary School transfers to the new location, Rainbow Springs, a special education program, would move from its current location to the existing Moreno Elementary School site. The vacated, 23,000-square-foot Rainbow Springs facility would be converted into office and clerical workstations for the District Security Department.

4. Environmental Checklist

9. Surrounding Land Uses and Setting:

The site is bounded by Nason Street and vacant agricultural land to the west, Bay Avenue, residential and a church to the south, a church and vacant land to the north, and vacant agricultural land to the east.

10. Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement:

None

11. 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 5097.94 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.

Yes. California Native American tribes have requested formal notice of proposed projects as follows:
Pechanga Band of Luiseño Indians, letter dated June 2015.

The Moreno Valley Unified School District notified the tribe about this project in a letter dated January 10, 2020, and sent via certified mail and email to Ms. Anna Hoover, Cultural Analyst, Pechanga Band of Luiseño Indians.

4. Environmental Checklist

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

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

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

Signature

Date

Printed Name

For

4. Environmental Checklist

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 would 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 may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: 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 “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other 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.

4. Environmental Checklist

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

SPECIAL REQUIREMENTS UNDER THE STATE SCHOOL FACILITY PROGRAM

The State of California's standards for school site selection are in Title 5 of the California Code of Regulations (CCR) § 14010. Additional regulations applicable to school facilities are in the Education, Government, and Public Resources Codes. These criteria and requirements are addressed in other documents because they are not within the purview of CEQA. Generally, CEQA is limited to the assessment of a project's potential impacts on the environment and not the environment's impacts on a project. However, CEQA requires that no EIR or Negative Declaration be approved without making findings relative to certain health and safety factors in the lead agency's assessment of a new school site or addition to an existing school site. These are outlined in PRC § 21151.8.

§ 21151.8. SCHOOLSITE ACQUISITION OR CONSTRUCTION; APPROVAL OF ENVIRONMENTAL IMPACT REPORT OR NEGATIVE DECLARATION; CONDITIONS

- (a) An environmental impact report shall not be certified or a negative declaration shall not be approved for a project involving the purchase of a school site or the construction of a new elementary or secondary school by a school district unless all of the following occur:
 - (1) The environmental impact report or negative declaration includes information that is needed to determine if the property proposed to be purchased, or to be constructed upon, is any of the following:
 - (A) The site of a current or former hazardous waste disposal site or solid waste disposal site and, if so, whether the wastes have been removed.
 - (B) A hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted pursuant to § 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with § 25300) of Division 20 of the Health and Safety Code.
 - (C) A site that contains one or more pipelines, situated underground or aboveground, that carries hazardous substances, extremely hazardous substances, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood, or other nearby schools.

4. Environmental Checklist

- (D) A site that is within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor.
- (2) (A) The school district, as the lead agency, in preparing the environmental impact report or negative declaration has notified in writing and consulted with the administering agency in which the proposed schoolsite is located, pursuant to § 2735.3 of Title 19 of the California Code of Regulations, and with any air pollution control district or air quality management district having jurisdiction in the area, to identify both permitted and nonpermitted facilities within that district's authority, including, but not limited to, freeways and busy traffic corridors, large agricultural operations, and railyards, within one-fourth of a mile of the proposed schoolsite, that might reasonably be anticipated to emit hazardous emissions or handle hazardous or extremely hazardous substances or waste. The notification by the school district, as the lead agency, shall include a list of the locations for which information is sought.
 - (B) Each administering agency, air pollution control district, or air quality management district receiving written notification from a lead agency to identify facilities pursuant to subparagraph (A) shall provide the requested information and provide a written response to the lead agency within 30 days of receiving the notification. The environmental impact report or negative declaration shall be conclusively presumed to comply with subparagraph (A) as to the area of responsibility of an agency that does not respond within 30 days.
 - (C) If the school district, as a lead agency, has carried out the consultation required by subparagraph (A), the environmental impact report or the negative declaration shall be conclusively presumed to comply with subparagraph (A), notwithstanding any failure of the consultation to identify an existing facility or other pollution source specified in subparagraph (A).
- (3) The governing board of the school district makes one of the following written findings:
 - (A) Consultation identified no facilities of this type or other significant pollution sources specified in paragraph (2).
 - (B) The facilities or other pollution sources specified in paragraph (2) exist, but one of the following conditions applies:
 - (i) The health risks from the facilities or other pollution sources do not and will not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the proposed school.
 - (ii) Corrective measures required under an existing order by another agency having jurisdiction over the facilities or other pollution sources will, before the school is occupied, result in the mitigation of all chronic or accidental hazardous air emissions to levels that do not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the proposed school. If the governing board makes a finding pursuant to this clause, it shall also make a subsequent finding, prior to occupancy of the school, that the emissions have been so mitigated.

4. Environmental Checklist

- (iii) For a school site with a boundary that is within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor, the governing board of the school district determines, through analysis pursuant to paragraph (2) of subdivision (b) of § 44360 of the Health and Safety Code, based on appropriate air dispersion modeling, and after considering any potential mitigation measures, that the air quality at the proposed site is such that neither short-term nor long-term exposure poses significant health risks to pupils.
- (C) The facilities or other pollution sources specified in paragraph (2) exist, but conditions in clause (i), (ii) or (iii) of subparagraph (B) cannot be met, and the school district is unable to locate an alternative site that is suitable due to a severe shortage of sites that meet the requirements in subdivision (a) of § 17213 of the Education Code. If the governing board makes this finding, the governing board shall adopt a statement of Overriding Considerations pursuant to § 15093 of Title 14 of the California Code of Regulations.

These air quality and hazards topics are additional to the standard CEQA checklist. The following matrix identifies the specific questions related to the required findings and where in the CEQA checklist these are addressed. The assessment may be used to make the written findings required in PRC § 21151.8(a)(3).

SPECIAL CEQA REQUIREMENTS FOR A NEW SCHOOL SITE OR ADDITION TO EXISTING SCHOOL

Topic	Applicable Code	Environmental Checklist
<i>Air Quality</i>		
Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the school?	PRC § 21151.8(a)(1)(D)	Section III, Air Quality, Question (e)
Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions or handle hazardous or acutely hazardous material, substances, or waste?	PRC § 21151.8 (a)(2)	Section III, Air Quality, Question (f)
<i>Hazards and Hazardous Materials</i>		
Does the proposed school site contain one or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood?	PRC § 21151.8 (a)(1)(C)	Section IX, Hazards and Hazardous Materials, Question (h)
Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?	PRC § 21151.8 (a)(1)(A)	Section IX, Hazards and Hazardous Materials, Question (i)
Is the project site a hazardous substance release site identified by the state Department of Health Services in a current list adopted pursuant to § 25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code?	PRC § 21151.8 (a)(1)(B)	Section IX, Hazards and Hazardous Materials, Question (j)

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized 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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
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?			X	

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	
e) Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the school?			X	
f) Create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions or handle hazardous or acutely hazardous material, substances, or waste?			X	

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 Wildlife or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

V. CULTURAL RESOURCES. Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			X	
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

VI. ENERGY. Would the project:

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				
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 Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
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?			X	
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?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				
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?			X	
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?			X	

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
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?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X
h) Does the proposed school site contain one or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood?			X	
i) Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?				X
j) Is the project site a hazardous substance release site identified by the state Department of Health Services in a current list adopted pursuant to § 25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code?			X	
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?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
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; or			X	

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iv) impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
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?			X	
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				X
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?				X
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?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
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 roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:				

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Fire protection?			X	
Police protection?			X	
Schools?				X
Parks?				X
Other public facilities?				X
XVI. RECREATION.				
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?				X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?		X		
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?				X
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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				X
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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the waste water 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?			X	
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?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X
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?				X
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?				X
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?				X
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?				X
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?		X		
b) Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?		X		

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) 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 projects, and the effects of probable future projects.)		X		
d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

5. Environmental Analysis

Chapter 4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if required.

AESTHETICS

Except as provided in Public Resources Code § 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?

No Impact. Vistas provide visual access or panoramic views to a large geographic area. The field of view from a vista location can be wide and extend into the distance. Panoramic views are usually associated with vantage points looking out over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley, mountain range, the ocean, or other water bodies.¹⁹

The Moreno Valley General Plan designates view corridors in the City. Because much of Moreno Valley is on a flat valley floor, these corridors generally allow for scenic views of the Box Springs Mountains to the north and the Mount Russell foothills to the south. There are no General Plan–designated view corridors that overlook the project site.

The project area has residential and institutional uses with one- and two-story buildings. The project site is flat and mostly vacant former agriculture land, with a one-story house and outbuildings. The new school buildings would be similar in size and scale to the existing buildings in the area. The project would have a two-story building, hardscape (walkways and hardcourts), parking lots, playgrounds, and turf playfields. There are no protected or designated scenic vistas or views in the project vicinity, and the project would not obscure any scenic views. Therefore, no impact to scenic vistas would occur.

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

No Impact. A highway may be designated scenic by the California Department of Transportation (Caltrans) depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view.²⁰

¹⁹ City of Los Angeles. 2006. LA CEQA Thresholds Guide, Chapter A.

<https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf>.

²⁰ California Department of Transportation. 2020, January 6. Scenic Highways - Frequently Asked Questions.

<https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways/lap-liv-i-scenic-highways-faq2>.

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There are no designated state scenic highways in or near the City of Moreno Valley. The closest officially designated state scenic highways are State Route 243 (SR 243; Banning-Idyllwild Panoramic Highway) approximately 18 miles east and SR 74 (Palms to Pines Scenic Byway) 24 miles southeast of the project site.²¹ The new school would not be visible from the designated state highways or the 10 eligible state scenic highways in Riverside County.²² The project would not result in impacts to scenic resources within a designated state scenic highway; therefore, no impact would occur.

- c) In nonurbanized 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?**

Less than Significant Impact. Although the project site in a rural/suburban area, it meets the definition of an “urbanized area.”²³ Additionally, surrounding land is zoned for suburban residential, office, and public facilities. The 8.97-acre site is zoned R3 (Residential – up to 3 dwelling units/acre).²⁴ Schools are conditionally allowed. The primary purpose of the R3 zoning is to provide a transition between rural- and urban-density development areas, and to provide for a suburban lifestyle on residential lots larger than those commonly found in suburban subdivisions. The project includes demolition and removal of the house, orchard, and outbuildings; construction of a two-story building; and other site improvements. Schools are typically located in residential areas because they serve the students that live in those areas. The project would not conflict with the zoning or regulations governing scenic quality. Impacts would be less than significant.

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

Less Than Significant Impact. The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object appears against a dark background, such as oncoming vehicle headlights or an unshielded light bulb.

The project site currently generates minimal nighttime light from the single-family home and outbuildings. The project vicinity has street lights, vehicle lights, parking lot lights, and building and security lights. The new campus would have nighttime lights for the safety of people and the security of property. The project would not include any high-intensity lighting such as those used for athletic fields or nighttime sports activity. Security and path lights would be directional and would not spill light to nearby residential properties. All lights would

²¹ Caltrans. 2020, January 6. Scenic Highways - Scenic Highway System Lists. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>

²² Caltrans. 2020, January 6. Scenic Highways - Scenic Highway System Lists. <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>

²³ PRC § 21071/CEQA Guidelines § 15191(m)(1). For an incorporated city, “urbanized area” means a city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons. The City of Moreno Valley had a population of about 193,365 in 2010 (U.S. Census Bureau. QuickFacts. April 1, 2010 Census, <https://www.census.gov/quickfacts/fact/table/morenovalleycitycalifornia/POP010210>). The population is anticipated to have increased since 2010.

²⁴ City of Moreno Valley. 2019, October 10. City of Moreno Valley Zoning Map. <http://www.moreno-valley.ca.us/cdd/pdfs/ZoningMap.pdf>.

5. Environmental Analysis

also be shielded to avoid light spill and glare onto adjacent properties. Lighting would not be substantially greater intensities than existing lights near the project site, and nighttime views would not be significantly affected. Light and glare impacts would be less than significant.

AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

Less Than Significant Impact. The Farmland Mapping and Monitoring Program produces maps and statistical data for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status and is divided into five categories: Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Unique Farmland, and Grazing Land. The best quality land is Prime Farmland.²⁵ Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Unique Farmland is farmland of lesser quality soils used for the production of the state's leading agricultural crops.

According to the Farmland Mapping and Monitoring Program, the 8.97-acre site is mapped as "Farmland of Local Importance".²⁶ Farmland of Local Importance is defined as land important to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. The site was used for agricultural purposes (orchard) since at least 1938 to about 2004.²⁷

Agriculture was abandoned about 16 years ago. Although the site has been used for agriculture in the past, it is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and there is no existing agricultural or farm use on or adjacent to the project site. Impacts from the conversion of designated farmlands would be less than significant.

²⁵ California Department of Conservation. 2016. Farmland Mapping and Monitoring Program.
<http://www.conservation.ca.gov/dlrp/fmmp>.

²⁶ California Department of Conservation. 2016. Farmland Mapping and Monitoring Program.
<http://www.conservation.ca.gov/dlrp/fmmp>.

²⁷ PlaceWorks. 2019, April. Preliminary Environmental Assessment: Proposed Moreno Valley Elementary School – Nason Street.

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

No Impact. The zoning designation for the site is R3 (Residential).²⁸ There is no zoning for agricultural use on-site. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect on the project site.²⁹ No impact would occur.

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

No Impact. Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”³⁰ Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.”³¹

The project site is zoned as R3 (Residential). There is no zoning on-site for forest, timberland, or timberland production use.³² No impact would occur.

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

No Impact. The project site is not designated as forest land, and no vegetation on-site is cultivated for forest resources. Construction of the project would not result in the loss or conversion of forest land. No impact would occur.

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

No Impact. The site is mapped as Farmland of Local Importance; however, agricultural production ended about 2004 and the citrus orchard has been removed. Although a few citrus trees remain around the house, the farmland has been vacant for 16 years and the entire parcel is zoned R3 (Residential). The vacant adjacent parcels are not used for agriculture; therefore, development of the site would not result in the conversion of farmland to nonagricultural use. Land surrounding the project site is designated for development: residential, public facilities, office, and mixed-use.

²⁸ City of Moreno Valley. 2019, October 10. City of Moreno Valley Zoning Map. <http://www.moreno-valley.ca.us/cdd/pdfs/ZoningMap.pdf>.

²⁹ Division of Land Resource Protection (DLRP). 2012. Riverside County Williamson Act FY 2008/2009 Sheet 1 of 3. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/riverside_w_08_09_WA.pdf.

³⁰ California Public Resources Code § 12220[g]

³¹ California Public Resources Code § 4526

³² City of Moreno Valley. 2019, October 10. City of Moreno Valley Zoning Map. <http://www.moreno-valley.ca.us/cdd/pdfs/ZoningMap.pdf>.

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Additionally, there is no forest land on or near the project site. The project would not indirectly cause conversion of such land to nonagricultural or nonforest use. No impact would occur.

AIR QUALITY

A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the project site, and air quality modeling can be found in Appendix A. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:

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

Less Than Significant Impact. The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead (Pb). Areas are classified under the federal and California Clean Air Acts as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (South Coast AQMD), is designated nonattainment for O₃, and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.³³

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including volatile organic compounds (VOC), CO, nitrogen oxides (NO_x), sulfur oxides (SO_x), PM₁₀, and PM_{2.5}. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation.

The South Coast AQMD adopted the 2016 Air Quality Management Plan on March 3, 2017. Regional growth projections are used by South Coast AQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. This is a local school district project.

Based on the scope and nature of the project and the fact that students would be transferred from other schools within the District, this project is not considered a project of statewide, regional, or areawide significance that would require intergovernmental review under § 15206(b) of the CEQA Guidelines. Therefore, the project would not have the potential to substantially affect SCAG's demographic projections. Additionally, as demonstrated in item (b), below, the regional emissions that would be generated by the operational phase of

³³ California Air Resources Board (CARB). 2017, October 18. Area Designations Maps/State and National. <http://www.arb.ca.gov/desig/desig.htm>.

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the school would be less than the South Coast AQMD emissions thresholds and would therefore not be a substantial source of air pollutant emissions with the potential to affect the attainment designations in the SoCAB. Therefore, the proposed project would not affect the regional emissions inventory or conflict with strategies in the air quality management plan. Impacts would be less than significant.

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

Less Than Significant Impact. The following describes project-related impacts from regional short-term construction activities and regional long-term operation of the proposed project.

Regional Short-Term Construction Impacts

Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust from off-road diesel-powered construction equipment; 2) dust generated by construction activities; 3) exhaust from on-road vehicles; and 4) off-gassing of VOCs from paints and asphalt.

The project would involve demolition, grading, building construction, painting, and paving. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2.25, and are based on the project's preliminary construction duration and CalEEMod default phasing and equipment mix. Construction emissions modeling are shown in Table 3, which shows that maximum daily emissions for VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Short-term air quality impacts from project-related construction activities would be less than significant.

Table 3 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants ^a (lb/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀ ^b	PM _{2.5} ^b
Year 2020						
Demolition and Demolition Haul	3	34	22	<1	2	2
Site Preparation	4	43	22	<1	10	6
Grading and Soil Haul	3	47	20	<1	6	3
Utility Trenching	<1	2	3	<1	<1	<1
Building Construction 2020	3	27	25	<1	3	2
Year 2021						
Building Construction 2021	3	24	24	<1	3	2
Paving	2	13	15	<1	1	1
Architectural Coating 2021	17	2	3	<1	<1	<1
Year 2022						
Architectural Coating 2022	17	1	3	<1	<1	<1
Finishing and Landscaping	<1	2	3	<1	<1	<1
Maximum Daily Construction Emissions						
Maximum Daily Emissions	17	47	25	<1	10	6
South Coast AQMD Regional Construction Threshold	75	100	550	150	150	55

5. Environmental Analysis

Table 3 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants ^a (lb/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀ ^b	PM _{2.5} ^b
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2.25.

a Based on the preliminary information provided by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.

b Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.

Long-Term Operation-Related Air Quality Impact

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). The proposed buildings would, at minimum, be designed and built to meet the 2019 Building Energy Efficiency Standards and the 2019 California Green Building Standards Code (CALGreen). As shown in Table 4, it is anticipated that operation would result in overall minimal emissions and would not exceed the South Coast AQMD regional operation-phase significance thresholds. Therefore, impacts to the regional air quality associated with operation of the school would be less than significant.

Table 4 Maximum Daily Regional Operation Emissions

Source	Maximum Daily Emissions (lbs/Day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM ₂
Area	2	<1	<1	<1	<1	<1
Energy ^a	<1	<1	<1	<1	<1	<1
Mobile	2	2	21	<1	6	2
Total	4	2	21	<1	6	2
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2016.3.2.25.

Notes: lbs: pounds. Highest winter or summer emissions are reported.

a For purposes of this analysis, the proposed elementary school is assumed to be designed and built to meet the 2019 Building Efficiency Standards and CALGreen Code.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant With Mitigation Incorporated. The proposed project could expose sensitive receptors to elevated pollutant concentrations if it causes or significantly contributes to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

5. Environmental Analysis

Construction LSTs

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the project site, distance to the nearest sensitive receptor, and Source Receptor Area (SRA). The nearest off-site sensitive receptors are the residences along Bay Avenue to the south.

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 5 shows that the maximum daily construction emissions (pounds per day) for NO_x, CO, PM₁₀, and PM_{2.5} construction emissions would be less than their respective South Coast AQMD screening-level LSTs, except for PM_{2.5} during the site preparation phase.

Table 5 Localized Construction Emissions

Construction Activity	Pollutants(lbs/day) ^a			
	NO _x	CO	PM ₁₀ ^b	PM _{2.5} ^b
South Coast AQMD ≤1.00 Acre LST	118	602	4	3
Demolition and Demolition Haul	33	22	2	2
Utility Trenching	2	3	<1	<1
Paving	13	15	1	1
Architectural Coating (2021)	2	2	<1	<1
Architectural Coating (2022)	1	2	<1	<1
Finishing and Landscaping	2	3	<1	<1
Exceeds LST?	No	No	No	No
South Coast AQMD 1.50-Acre LSTs	134	690	5	3
Grading	21	12	3	2
Building Construction (2020)	19	17	1	1
Building Construction (2021)	17	17	1	1
Exceeds LST?	No	No	No	No
South Coast AQMD 2.50 Acre LST	187	999	8	5
Grading and Grading Soil Haul	26	16	4	3
Exceeds LST?	No	No	No	No
South Coast AQMD 3.50-Acre LSTs	220	1,230	9.99	6.00
Site Preparation	42	22	9.92	6.27
Exceeds LST?	No	No	No	Yes

Sources: CalEEMod Version 2016.3.2.25.

South Coast Air Quality Management District (South Coast AQMD). 2008, July. Final Localized Significance Threshold Methodology.

South Coast Air Quality Management District (South Coast AQMD). 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds.

Notes: In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment are included in the analysis. The screening-level LSTs are based on receptors within 82 feet (25 meters) of the project site in SRA 24. Highest winter or summer emissions are reported in SRA 24.

^a Where specific information for project-related construction activities or processes was not available, modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.

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^b Includes fugitive dust control measures required by South Coast AQMD under Rule 403, such as watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.

However, as shown in Table 6, implementation of Mitigation Measure AQ-1, which requires construction contractors to water exposed ground surfaces and disturbed areas three times a day (instead of two times a day), would reduce construction-related emissions below the South Coast AQMD screening-level LST. Therefore, air quality impacts from project-related construction activities would be less than significant with incorporation of mitigation.

Mitigation Measure

AQ-1 The Moreno Valley Unified School District shall specify in the construction bid that construction contractors shall water exposed ground surfaces and disturbed areas three times per day during site preparation activities (grading) to minimize fugitive dust. Prior to construction, the construction contractors shall ensure that all construction plans submitted to the District's Construction Manager, or designee, clearly show the watering requirement to control fugitive dust.

Table 6 Localized Construction Emissions With Mitigation

Construction Activity	Pollutants(lbs/day) ^a			
	NO _x	CO	PM ₁₀ ^b	PM _{2.5} ^b
South Coast AQMD ≤1.00 Acre LST	118	602	4	3
Demolition and Demolition Haul	33	22	2	2
Utility Trenching	2	3	<1	<1
Paving	13	15	1	1
Architectural Coating (2021)	2	2	<1	<1
Architectural Coating (2022)	1	2	<1	<1
Finishing and Landscaping	2	3	<1	<1
Exceeds LST?	No	No	No	No
South Coast AQMD 1.50-Acre LSTs	134	690	5	3
Grading	21	12	3	2
Building Construction (2020)	19	17	1	1
Building Construction (2021)	17	17	1	1
Exceeds LST?	No	No	No	No
South Coast AQMD 2.50 Acre LST	187	999	8	5
Grading and Grading Soil Haul	26	16	4	3
Exceeds LST?	No	No	No	No
South Coast AQMD 3.50-Acre LSTs	220	1,230	9.99	6.00
Site Preparation	42	22	8.89	5.70
Exceeds LST?	No	No	No	No

Sources: CalEEMod Version 2016.3.2.25.

South Coast Air Quality Management District (South Coast AQMD). 2008, July. Final Localized Significance Threshold Methodology.

South Coast Air Quality Management District (South Coast AQMD). 2011. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds.

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Notes: In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment are included in the analysis. The screening-level

LSTs are based on receptors within 82 feet (25 meters) of the project site in SRA 24. Highest winter or summer emissions are reported in SRA 24.

^a Where specific information for project-related construction activities or processes was not available, modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.

^b Includes fugitive dust control measures required by South Coast AQMD under Rule 403 and MM AQ-1, which requires watering disturbed areas three times per day.

Construction Health Risk

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In 2015, the Office of Environmental Health Hazards Assessment (OEHHA) adopted guidance for preparation of health risk assessments, which included the development of a cancer risk factor and noncancer chronic reference exposure level for DPM over a 30-year time frame.³⁴ The proposed project is anticipated to be completed in approximately 18 months, which would limit the exposure to on- and off-site receptors. Furthermore, construction activities would not generate on-site exhaust emissions that would exceed the screening-level construction LSTs. Currently, South Coast AQMD does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. Thus, construction emissions would not pose a health risk to on- and off-site receptors, and project-related construction health impacts would be less than significant.

Operation LSTs

Operation of the proposed project would not generate substantial emissions from on-site stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where truck idling would occur on-site. The proposed project does not fall within these categories of uses. Operation of the new buildings would use standard on-site mechanical equipment, such as heating, ventilation, and air conditioning equipment, and air pollutant emissions would be nominal. Localized air quality impacts related to operation-related emissions would be less than significant.

Carbon Monoxide Hotspots

Vehicle congestion has the potential to create pockets of CO called hotspots. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles are backed up, idle for longer periods, and are subject to reduced speeds. These pockets could exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations.

The SoCAB has been designated attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing

³⁴ Office of Environmental Health Hazard Assessment (OEHHA). 2015, February. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments: Appendix D. <https://oehha.ca.gov/media/downloads/cmr/2015gmappendices.pdf>.

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is substantially limited—in order to generate a significant CO impact.³⁵ The project-related 637 AM peak-hour vehicle trips³⁶ would be minimal compared to the AAQS screening levels. The project would not substantially increase CO hotspots at intersections, and impacts would be less than significant.

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

Less Than Significant Impact. The proposed project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

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

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project involves construction of a new elementary school campus and schools do not fall within the objectionable odors land uses. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Odor impacts would be less than significant.

e) Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the school?

Less Than Significant Impact. Public Resources Code § 21151.8(b)(9) and Education Code § 17213(d)(9) define a “freeway or other busy traffic corridors” as roadways that on an average day have traffic in excess of 50,000 vehicles in a rural area or 100,000 vehicles in an urban area. The nearest freeway is State Route 60, which is over a mile north of the project site. Roadways within 500 feet of the project site include Nason Street and Bay Avenue. However, based on the existing and anticipated daily traffic volumes of these roadways, they are not considered busy traffic corridors. Therefore, potential air quality risks due to the school’s proximity to a freeway or busy traffic corridor is not a hazard, and the project would not create any significant hazards.

f) Create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or

³⁵ Bay Area Air Quality Management District (BAAQMD). 2017, May. California Environmental Quality Act Air Quality Guidelines. http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

³⁶ EPD Solutions. April 2020. Traffic Impact Analysis (see Appendix G)

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air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions or handle hazardous or acutely hazardous material, substances, or waste?

Less Than Significant Impact. Based on the Proposed Moreno Valley School Nason Street Geological and Environmental Hazards Assessment Report in Appendix C, a review of the South Coast AQMD's Facility Information Detail (FIND) database shows that there are no permitted facilities or mobile sources within one-quarter mile of the site. Furthermore, as seen in Air Quality item (e) above, there are no busy traffic corridors, large agricultural operations, or rail yards within a quarter mile of the project site.

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 Wildlife or U.S. Fish and Wildlife Service?**

No Impact. The project site mostly consists of vacant land, with a single-family home, a garage, barn, and small citrus orchard. Vegetation on-site is limited to 20 citrus trees and ornamental landscape trees and shrubs. Vegetation in the project site was identified as grove/orchard with field croplands on the eastern edge.³⁷ Field croplands and groves/orchards both do not typically contain any native vegetation but could provide foraging ground for raptorial birds or cover for wildfire movement. Listed species under the federal Endangered Species Act and/or the California Endangered Species Act in Moreno Valley include the Stephens' kangaroo rat, California gnatcatcher, and the least Bell's vireo.³⁸ The project site is not in or adjacent to any reserve established under the Stephen's kangaroo rat habitat conservation plan (SKRHCP),³⁹ suitable habitat for least Bell's vireo,⁴⁰ or critical habitat for California gnatcatcher.⁴¹ The vacant 8.25-acre portion of the 8.97-acre parcel is regularly disked for weed abatement and does not serve as a suitable habitat for threatened, endangered, or rare species on-site. Therefore, no impact would occur.

³⁷ City of Moreno Valley. 2006, July. Environmental Impact Report Moreno Valley General Plan Biological Resources. http://www.moreno-valley.ca.us/city_hall/general-plan/06gpfinal/icir/5_9-bio-resources.pdf.

³⁸ City of Moreno Valley. 2006, July 11. Moreno Valley General Plan. http://www.moreno-valley.ca.us/city_hall/general-plan/06gpfinal/gp/gp-tot.pdf.

³⁹ Riverside County Habitat Conservation Agency. 2018, December 12. SKR Core Reserves. <https://rchca.us/DocumentCenter/View/200/SKR-Plan-Area>

⁴⁰ City of Moreno Valley. 2006, July 11. Moreno Valley General Plan. http://www.moreno-valley.ca.us/city_hall/general-plan/06gpfinal/gp/gp-tot.pdf.

⁴¹ Databasin. 2020. Final Critical Habitat for Coastal California Gnatcatcher (*Poliophtila californica californica*). <https://databasin.org/maps/new#datasets=1d10dd44b209448a8a6e34af03a0f7c5>

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- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

No Impact. Riparian habitats are those occurring along the banks of rivers and streams. There are no streams on the project site, with the exception of a drainage channel to the east of the project site. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies; that are known to provide habitat for sensitive animal or plant species; or are known to be important wildlife corridors. The vacant 8.25-acre portion of the 8.97-acre parcel is regularly disked for weed abatement. The structures on part of the parcel is surrounded by a chain-link fence. As discussed above, the project site is not located within any habitat for sensitive animal or plant species. There is no sensitive natural community on or adjacent to the project site. No impact would occur.

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

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. The site has a small residential use, and the remaining property is regularly disked for weed abatement. The surrounding properties are former citrus groves (trees have been removed and land is regularly disked for weed abatement), residential, and institutional uses. There are no protected wetlands on or adjacent to the project site.⁴² No impact would occur.

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

Less Than Significant Impact. Wildlife corridors link areas of natural habitats separated by rugged terrain, changes in vegetation, or human disturbance. Corridors accommodate animal movement to enhance genetic interchange and re-colonization of the species and provide buffers for species populations to use in response to environmental changes and natural disasters. Large corridors (often referred to as habitat or landscape linkages) can provide both transitory and resident habitat for a variety of species.

Although wildlife may cross it, the site does not function as a wildlife movement corridor and does not support native resident or migratory fish or wildlife species. It does not have any watercourse or water body, greenbelt, or native habitat for fish or wildlife.

Birds use trees as nesting or nursery sites, and project construction would require the removal of 20 citrus trees as well as the other vegetation around the existing buildings. Migratory nongame native bird species are

⁴² United States Fish & Wildlife Services. 2019, October 8. National Wetlands Inventory.
<https://www.fws.gov/wetlands/data/mapper.html>.

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protected by the California Fish and Game Code, §§ 3503, 3503.5, and 3513, which prohibit the take of all birds and their active nests. The District would comply with the California Fish and Game Code, which would ensure that if construction occurs during the avian breeding season, appropriate measures would be taken to avoid impacts to nesting birds. Compliance would involve preconstruction surveys. The surveys would be conducted no more than three days prior to construction activities. If an active bird nest is observed, the surveyor/biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location. No construction activity would occur within the buffer zone until the nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting. Impacts to nesting birds would be less than significant.

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

No Impact. The City of Moreno Valley does not have a tree preservation ordinance. City of Moreno Valley Municipal Code § 8.21.010 sets forth city policy to protect environmentally sensitive areas and biological and wildlife resources within and surrounding Moreno Valley, to the extent practical. The site has no habitat that would require preservation. The project would not conflict with any local policies or ordinances protecting biological resources and no impact would occur.

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

No Impact. The City of Moreno Valley is within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).⁴³ The MSHCP has a plan area of about 1.26 million acres extending from the western Riverside County boundary to the San Jacinto Mountains. The SKRHCP has a plan area of about 534,000 acres in western Riverside County and was established to protect one listed species, the Stephens' kangaroo rat, listed as federally endangered and state threatened. The project site is not in or next to any reserve established under either MSHCP or SKRHCP, and is not in or next to MSHCP criteria cells from which future MSHCP reserves will be assembled. Project development would not conflict with either HCP, and no impact would occur.⁴⁴

CULTURAL RESOURCES

The analysis in this section is based in part on the following:

- *Cultural Resources Evaluation Letter Report for the Proposed Elementary School at Nason Street and Bay Avenue, City of Moreno Valley, Riverside County, California*, ASM Affiliates, 26 April 2019.

A complete copy of this report is in the technical appendices of this Initial Study as Appendix B.

⁴³ United States Department of Fish and Wildlife. 2019, April. California Regional Conservation Plans. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>.

⁴⁴ Western Riverside County Regional Conservation Authority (RCA). 2003, June 17. Final MSHCP. http://wrcra.conserveriverside.com/wrcra/Permit_Docs/MSHCP_Docs/volume1/Vol1-sec3-3-2.pdf

5. Environmental Analysis

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Less Than Significant Impact. CEQA Guidelines § 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered “historically significant” if it meets one of the following criteria:

- i) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- ii) Is associated with the lives of persons important in our past;
- iii) 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;
- iv) Has yielded, or may be likely to yield, information important in prehistory or history.

A cultural resource evaluation was conducted, including an extensive survey of existing site, a pedestrian survey, site-specific research, analysis of relevant regulations, and evaluation of the site’s structures based on state and federal criteria. The three permanent buildings (house, garage, and barn) are older than 45 years but are not recommended eligible for listing in the California Register of Historical Resources (CRHR) nor as a contributor to any historic district under any criteria.⁴⁵ Also, the buildings are not individually eligible for CRHR listing for the following reasons:

- Although the residence is on property previously owned by Carl Walfred Lantz, the son of a Moreno Valley pioneer farmer, it is not the original homestead associated with the Lantz family.
- Even though the site is associated with the locally prominent Lantz family, who owned the house since 1955, it is not the most representative of the family’s residence in the area and is not directly associated with the lives of anyone of local importance.
- The house has had several alterations to the exterior that impact the integrity of the structure as an example of Minimal Traditional style. Moreover, a master architect or a noted local architect is not associated with any of the buildings.
- The buildings are common property types that do not have the potential to provide information about history or prehistory that is not available through historic research.

Therefore, the buildings are not historical resources because they are not eligible for the CRHR either individually or as contributors to a historic district. Historic resource impacts would be less than significant.

⁴⁵ ASM Affiliates. 2019, April 26. Cultural Resources Evaluation Letter Report for the Proposed Elementary School at Nason Street and Bay Avenue, City of Moreno Valley, Riverside County, California.

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

Less Than Significant Impact. Archaeological resources are cultural resources of prehistoric or historic origin that reflect human activity. Archaeological resources include both structural ruins and buried resource (buildings, structures, objects, and sites of the built environment). The term “unique archaeological resources” is defined in PRC § 21083.2(g) as:

... “unique archaeological resources” means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

The project site has been heavily disturbed by several structures on site since at least 1901, long-time agricultural use, construction of the existing house and outbuildings, and finally, the removal of citrus trees.⁴⁶

A pedestrian survey was conducted throughout the parcel with 15-meter-transect intervals. Vegetation was very heavy across the majority of the formerly agricultural parcel. The remnants of an irrigation system evidently associated with the orchard that once covered the parcel were documented along the northern edge of the parcel and along the northern edge of the small remaining citrus grove to the south of the residential complex. However, it is not considered a “unique archaeological resource.” The entire project area was carefully inspected for any sign of the presence of any other cultural materials; no previously undocumented resources were encountered during the intensive pedestrian archaeological survey.⁴⁷

Project-related site preparation would include removal of existing soil to a maximum depth of about 6 feet, with approximately 20 feet for storm drain and sewer trenching. Due to the highly disturbed nature of the project site, the potential for discovery of any subsurface archaeological resources would be unlikely. Therefore, impacts to archaeological resources would be less than significant.

⁴⁶ PlaceWorks. 2019, April. Preliminary Environmental Assessment: Proposed Moreno Valley Elementary School – Nason Street.

⁴⁷ ASM Affiliates. 2019, April 26. Cultural Resources Evaluation Letter Report for the Proposed Elementary School at Nason Street and Bay Avenue, City of Moreno Valley, Riverside County, California.

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

Less Than Significant Impact. The Moreno Valley General Plan Environmental Impact Report concluded that no known human remains were identified in the study area.⁴⁸ However, in the unlikely event that human remains are uncovered during project demolition, grading, or excavation, Government Code §§ 27460 et seq. mandate that there shall be no further excavation or disturbance until the Riverside County Coroner has determined that the remains are not subject to the provisions of § 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death; and the required recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in § 5097.98 of the PRC.

Pursuant to California Health and Safety Code § 7050.5, the coroner shall make a determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission by telephone within 24 hours. The District will comply with existing regulations. Human remain impacts would be less than significant.

ENERGY

Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. Project implementation would result in short-term construction and long-term operational energy consumption.

Short-Term Construction

Construction of the project would require energy use to power the construction equipment. The energy use would vary during different phases of construction—the majority of construction equipment during demolition and grading would be gas or diesel powered, and the later construction phases would require electricity-powered equipment for interior construction and architectural coatings. Construction activities would be subject to applicable regulations such as anti-idling measures (South Coast AQMD), limits on duration of activities (city municipal code), and the use of alternative fuels if possible (South Coast AQMD), thereby reducing energy consumption.

Transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction worker vehicles that would use diesel fuel and gasoline. Impacts related to transportation energy use during construction would be

⁴⁸ P&D Consultants, 2006. Environmental Impact Report City of Moreno Valley General Plan: Chapter 5-10 Cultural Resources. July 2006. http://www.moreno-valley.ca.us/city_hall/general-plan/06gpfinal/ieir/5_10-cultural-resources.pdf

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temporary and would not require expanded energy supplies or the construction of new infrastructure. Project construction would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. For example, there are no unusual characteristics that would directly or indirectly cause construction activities to be any less efficient than would occur elsewhere (restrictions on equipment, labor, types of activities, etc.).

Long-Term Operation

The new school would consume electricity for various purposes—heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; lighting; use of on-site equipment and appliances, etc. Southern California Edison provides electric service to the City of Moreno Valley. Southern California Gas Company provides gas service in the City of Moreno Valley. There is extensive and reliable infrastructure for electricity and gas services in the area.

California's Building Energy Efficiency Standards are updated on a three-year cycle to incorporate new energy efficiency technologies.⁴⁹ The 2019 Building Energy Efficiency Standards were adopted on May 9, 2018, and went into effect for new construction starting January 1, 2020. The 2019 standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements; 4) and nonresidential lighting requirements.⁵⁰ Under the 2019 standards, nonresidential buildings (which include school buildings) will be 30 percent more energy efficient compared to the 2016 standards.⁵¹ The new buildings would be significantly more energy efficient than the buildings on the current campus, built in 1966, and other District schools.

Students are currently attending other schools, and school buildings are consuming energy. The new school would serve students currently living in the region and would not generate an increase in the District-wide student population. Also, the new school would provide additional seats so student transportation distances would be reduced. The project would not result in an increase in motor vehicle transportation energy during operation over what is currently used.

There are no aspects of the project that would foreseeably result in the inefficient, wasteful, or unnecessary consumption of energy during operation.

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

No Impact. The State's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive

⁴⁹ The California Energy Code, part 6 of the California Building Standards Code which is title 24 of the California Code of Regulations, also titled The Energy Efficiency Standards for Residential and Nonresidential Buildings.

⁵⁰ California Energy Commission (CEC). 2018. News Release: Energy Commission Adopts Standards Requiring Solar Systems for New Homes, First in Nation. http://www.energy.ca.gov/releases/2018_releases/2018-05-09_building_standards_adopied_nr.html.

⁵¹ California Energy Commission (CEC). 2018. 2019 Building Energy and Efficiency Standards Frequently Asked Questions. http://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf.

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Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Senate Bill 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Governor Brown signed Senate Bill 100 (SB 100), which raises California's RPS requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Also, in compliance the Building Energy Efficiency Standards and the California Green Building Standards Code (CALGreen), the new campus would be significantly more energy efficient than other schools in the District. The project would be reviewed by DSA for compliance with design and construction and energy compliance. The project would not conflict with state or local plans for renewable energy or energy efficiency. No impacts would occur.

GEOLOGY AND SOILS

The analysis in this section is based in part of the following technical studies:

- *Cultural Resources Evaluation Letter Report for the Proposed Elementary School at Nason Street and Bay Avenue, City of Moreno Valley, Riverside County, California*, ASM Affiliates, April 26, 2019.
- *Geological and Environmental Hazards Assessment Report: Proposed Moreno Valley Elementary School – Nason Street*, PlaceWorks, April 2019
- *Geotechnical Investigation New Elementary School Northeast Corner of Nason Street and Bay Avenue Moreno Valley California*, John R. Byerly Incorporated, November 22, 2019

Complete copies of these studies are found in the technical appendices of this Initial Study as Appendix B, C, and D, respectively.

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 Division of Mines and Geology Special Publication 42.**

Less Than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture on habitable buildings. Fault rupture generally

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occurs within 50 feet of an active fault line and is limited to the immediate area of the fault. Active earthquake faults are faults where surface rupture has occurred within the last 11,000 years.

The project site is not within or immediately adjacent to a currently established Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards.⁵² The closest active fault to the project site is the San Jacinto Fault, which is 2.9 miles northeast of the site.⁵³ Alquist-Priolo Earthquake Fault Zone impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. There are several known faults in the Riverside region. The closest historically active surface fault is the Claremont segment of the San Jacinto Fault, located approximately 2.9 miles northeast of the site; the San Bernardino segment of the San Jacinto Fault is 4.4 miles north of the site.⁵⁴ Because of the proximity to known faults, and because the entire southern California region is considered seismically active, there is a potential for people and structures to experience strong ground shaking in the future from local and regional faults.

The new school buildings would be designed in accordance with the California Building Code, the California Geological Survey “Guidelines for Evaluating and Mitigating Seismic Hazards in California,” and “Checklist for the Review of Geologic/Seismic Reports for California Schools, Hospitals, and Essential Services Buildings.” The project requires approval from the California Department of General Services, Division of the State Architect. MVUSD would comply with these requirements in the design and construction of the new school buildings. Seismic ground shaking impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand, or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based upon three main contributing factors: 1) cohesionless, granular soils having relatively low densities (usually

⁵² California Department of Conservation (DOC). 1974, July 1, State of California Special Studies Zones. <https://gmw.conservation.ca.gov/SHP/EZRIM/Maps/SUNNYMEAD.PDF>.

⁵³ PlaceWorks. 2019, April. Geological and Environmental Hazards Assessment Report: Proposed Moreno Valley Elementary School – Nason Street.

⁵⁴ Wills, C. J., R. J. Weldon II, and W. A. Bryant, 2008. Appendix A: California Fault Parameters for the National Seismic Hazard Maps and Working Group on California Earthquake Probabilities 2007, Version 1.0, U.S. Geological Survey Open-File Report 2007-1437A; _ and Morton, D. M., and J. C. Matti, 2001. Geologic Map of the Sunnymead 7.5' Quadrangle, Riverside County, California, Version 1.0, U.S. Geological Survey Open-File Report 01-450, scale 1:24,000

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of Holocene age);⁵⁵ 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking.

Groundwater has historically been at a depth greater than 100 feet below existing grade.⁵⁶ Additionally, liquefaction potential for the project site is noted as low.⁵⁷ Therefore, the potential for liquefaction and the associated ground failure is considered low. The project would not subject people or structures to substantial hazards, and impacts would be less than significant.

iv) Landslides?

No Impact. Landslides are a type of erosion in which masses of earth and rock move down slope as a single unit. Susceptibility of slopes to landslides and lurching (earth movement at right angles to a cliff or steep slope during ground shaking) depend on several factors that are usually present in combination—steep slopes, condition of rock and soil materials, presence of water, formational contacts, geologic shear zones, and seismic activity.

The project site and vicinity are relatively flat and have a slope of less than 2 percent toward the south.⁵⁸ The relatively flat topography at the site precludes both landslides and the potential for lurching. There are no known landslides near the site, nor is the site in the path of any known or potential landslides or seismic slope instability. The project would not expose people or the new school buildings to adverse effects from landslides. No impact would occur.

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

Less Than Significant Impact. Topsoil is the thin, rich layer of soil where most nutrients for plants are found and where most land-based biological activity takes place. The loss of topsoil through erosion is a major agricultural problem. Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved; removed from one place; and transported to another. Precipitation, running water, and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. Accelerated erosion in an urban area can cause damage by undermining structures; blocking storm drains; and depositing silt, sand, or mud on roads and in tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life.

The project site is currently susceptible to erosion because most of the site has soil that is exposed to weather.

⁵⁵ The Holocene epoch began 12,000 to 11,500 years ago.

⁵⁶ John R. Byerly Incorporated. 2019, November 22. Geotechnical Investigation New Elementary School Northeast Corner of Nason Street and Bay Avenue Moreno Valley California.

⁵⁷ PlaceWorks. 2019, April. Geological and Environmental Hazards Assessment Report: Proposed Moreno Valley Elementary School – Nason Street.

⁵⁸ PlaceWorks. 2019, April. Geological and Environmental Hazards Assessment Report: Proposed Moreno Valley Elementary School – Nason Street.

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Construction Phase

Project-related construction activities would expose soil through excavation, grading, and trenching, and thus could cause erosion during heavy winds or rain storms.

Construction projects of one acre or more are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities 2009-0009-DWQ (as amended by Order No. 2010-0014-DWQ and 2012-006-DWQ), issued by the State Water Resources Control Board (SWRCB). Individual developers are required to submit permit registration documents (PRDs) to the SWRCB for coverage under the NPDES permit prior to the start of construction. The PRDs include a notice of intent, risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement. A SWPPP requires the incorporation of best management practices (BMP) to control sediment, erosion, and hazardous materials contamination of runoff during construction and prevent contaminants from reaching receiving water bodies. Construction activities would disturb an area of about nine acres; thus, would be subject to the Statewide Construction General Permit. MVUSD would obtain coverage by preparing and implementing a SWPPP. Categories of potential BMPs used in SWPPPs are described in Table 7.

Table 7 Construction BMPs

Category	Purpose	Examples
Erosion Controls and Wind Erosion Controls	<ul style="list-style-type: none"> Use project scheduling and planning to reduce soil or vegetation disturbance (particularly during the rainy season) Prevent or reduce erosion potential by diverting or controlling drainage Prepare and stabilize disturbed soil areas 	Scheduling, preservation of existing vegetation, hydraulic mulch, hydroseeding, soil binders, straw mulch, geotextile and mats, wood mulching, earth dikes and drainage swales, velocity dissipation devices, slope drains, streambank stabilization, compost blankets, soil preparation/roughening, and non-vegetative stabilization
Sediment Controls	<ul style="list-style-type: none"> Filter out soil particles that have been detached and transported in water 	Silt fence, sediment basin, sediment trap, check dam, fiber rolls, gravel bag berm, street sweeping and vacuuming, sandbag barrier, straw bale barrier, storm drain inlet protection, manufactured linear sediment controls, compost socks and berms, and biofilter bags
Wind Erosion Controls	<ul style="list-style-type: none"> Apply water or other dust palliatives to prevent or minimize dust nuisance 	Dust control soil binders, chemical dust suppressants, covering stockpiles, permanent vegetation, mulching, watering, temporary gravel construction, synthetic covers, and minimization of disturbed area
Tracking Controls	<ul style="list-style-type: none"> Minimize the tracking of soil offsite by vehicles 	Stabilized construction roadways and construction entrances/exits, and entrance/outlet tire wash.
Non-Storm Water Management Controls	<ul style="list-style-type: none"> Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance, and fueling of vehicles and equipment. 	Water conservation practices, temporary stream crossings, clear water diversions, illicit connection/discharge, potable and irrigation water management, and the proper management of the following operations: paving and grinding,

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Table 7 Construction BMPs

Category	Purpose	Examples
	<ul style="list-style-type: none"> Conduct various construction operations, including paving, grinding, and concrete curing and finishing, in ways that minimize non-stormwater discharges and contamination of any such discharges. 	dewatering, vehicle and equipment cleaning, fueling and maintenance, pile driving, concrete curing, concrete finishing, demolition adjacent to water, material over water, and temporary batch plants.
Waste Management and Controls (i.e., good housekeeping practices)	<ul style="list-style-type: none"> Manage materials and wastes to avoid contamination of stormwater. 	Stockpile management, spill prevention and control, solid waste management, hazardous waste management, contaminated soil management, concrete waste management, sanitary/septic waste management, liquid waste management, and management of material delivery storage and use.

Source: California Stormwater Quality Association (CASQA), California Construction Best Management Practices Handbook, July 2012.

Submittal of the PRDs and implementation of the SWPPP and the erosion control plan throughout the construction phase would address pollutants of concern. The District would comply with all applicable water quality standards and waste discharge requirements, as well as compliance with South Coast AQMD rules that prohibit grading activities and site disturbance during high wind events. Erosion impacts associated with construction activities would be less than significant.

Operational Phase

After completion of the project, ground surfaces at the project site would be either hardscaped, paved, or maintained landscaping. No large areas of soil would be exposed to erosion. In addition, reduction of stormwater-related soil erosion would include hydrologic features designed to slow, filter, and retain stormwater on-site within landscaping and the detention basin, in compliance with Riverside County's "Low Impact Development BMP Design Handbook."⁵⁹ Operational phase soil erosion impacts would be less than significant.

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

Less Than Significant Impact. Hazards arising from liquefaction and landslides would be less than significant, as discussed above in Sections 5.7.a (iii) and (iv).

The soils underlying the site were explored through drilled test borings to a maximum depth of 51.1 feet below the existing ground surface. Artificial fill consisting of loose to medium dense silty sands with varying amounts of gravel was found at depths of between one and three feet below ground surface (bgs). In general, the upper 12 to 24 inches of soil was relatively loose and disturbed due to previous disking. Below the artificial fill, natural soils consist of loose to dense sands and silty sands, with an occasional trace of gravel and clay. Relatively porous natural soils were encountered to a depth of 3.5 feet in one boring. Loose natural soils extend to depths

⁵⁹ County of Riverside, 2011, Low Impact Development BMP Design Handbook.
<http://www.floodcontrol.co.riverside.ca.us/NPDES/LIDBMP.aspx>

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ranging from 3 feet to 15 feet, and silty fine to coarse sand is below that. Very dense granitic bedrock was encountered at a depth of 40 feet.

Lateral spreading. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The project site is not prone to lateral spreading because near-surface soils are not prone to liquefaction.

Subsidence. The major cause of ground subsidence is withdrawal of groundwater. Soils that are particularly subject to subsidence include those with high silt or clay content. The project would not withdraw groundwater. The project site is not in an area of known subsidence. Project implementation would not pose substantial hazards to people or structures due to ground subsidence, and impacts would be less than significant.

Seismically Induced Settlement. Seismically induced settlement occurs in dry sands—in contrast to liquefaction, which occurs in saturated sand or gravel—and is often caused by loose to medium-dense granular soils densified during ground shaking. Seismically induced settlement is estimated to be on the order of ½ inch or less in the event of a maximum earthquake. Differential seismically induced settlement is estimated to be about ¼ inch or less. The District would comply with the geotechnical investigation report, recommendations for proper engineering design, and construction in conformance with current building codes and engineering practices to minimize hazards to people and structures arising from seismically induced settlement. The project would not pose substantial hazards to people or structures, and impacts would be less than significant.

Collapsible Soils. Collapsible soils are typically geologically young, unconsolidated sediments of low density that may compress under the weight of structures. Natural soils may be susceptible to consolidation and collapse (including hydrocollapse with the addition of water). Consolidation is a condition that occurs when increased load is placed on soil with a low relative density, causing pore spaces to become smaller, and where saturated forcing water to be squeezed out. Hydrocollapse happens when a dry soil that is able to withstand increased load collapses upon saturation.

Soil collapse typically occurs when saturated, collapsible soils undergo a rearrangement of their grains and a loss of cementation, resulting in substantial and rapid settlement under relatively light loads. An increase in surface water infiltration, such as from irrigation, or a rise in the groundwater table, combined with the weight of a building or structure, can initiate rapid settlement and cause foundations and walls to crack.

Native soils begin below undocumented fill material, at depths ranging from 3 to 15 feet bgs.⁶⁰ During construction, grading operations would excavate and recompact site soils. At project completion, well-compacted earth would underlie the project.

The Architect of Record would ensure compliance with applicable laws pertaining to school construction, including the California Building Code. The DSA reviews and approves construction drawings for new public schools. As part of the DSA review process, MVUSD is required to comply with the final engineering-level Geotechnical Report. This report includes, but is not limited to: identification of building setbacks, site

⁶⁰ John R. Byerly Incorporated. 2019, November 22. Geotechnical Investigation New Elementary School Northeast Corner of Nason Street and Bay Avenue Moreno Valley California.

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preparation, fill placement, temporary shoring, groundwater seismic design features, excavation stability, foundations, soil stabilization, establishment of deep foundations, concrete slabs and pavements, surface drainage, cement type and corrosion measures, erosion control, shoring and internal bracing, and plan review.

The project design and development would incorporate all recommended measures outlined in the final engineering-level geotechnical study. The project would not pose substantial hazards to people or structures due to collapsible soils, and impacts would be less than significant.

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?

Less Than Significant Impact. Expansive soils possess clay particles that react to moisture changes by shrinking when dry and swelling when wet. These soils have the potential to crack building foundations and, in some cases, structurally distress the buildings themselves. Soils at the project site are considered to have a very low expansion potential.⁶¹ Therefore, the project would not expose people or the new school buildings to adverse effects associated with expansive soils. Impacts would be less than significant.

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

No Impact. The project site is served by sewer laterals connecting to sewer mains in nearby roadways; project development would include installation of new laterals connecting to the new buildings. Project development would not use septic tanks or other alternative wastewater disposal systems. No impact would occur.

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

Less Than Significant with Mitigation Incorporated. A paleontological resource is a natural resource characterized as faunal or floral fossilized remains but may also include specimens of nonfossil material dating to any period preceding human occupation. These resources are valued for the information they yield about the history of the earth and its past ecological settings. The resources are found in geologic strata conducive to their preservation, typically sedimentary formations. Often they appear as simply small outcroppings visible on the surface; other times they are below the ground surface and may be encountered during grading.

The project site is underlain by Quaternary, very old alluvial-fan deposits, which are considered early Pleistocene in age at the surface. Vertebrate fossils have been recovered from Older Quaternary alluvial deposits in the region near Lake Elsinore, Lake Skinner in Perris, and Diamond Valley Lake in Hemet.

Native soils occur at a depth of about three feet bgs, below undocumented fill material. Shallow excavations are not likely to contain fossil specimens; however, deeper deposits of older Quaternary alluvium at or exceeding four feet bgs may contain fossils or other paleontological resources.⁶² Project-related site preparation would include removal of existing soil to a maximum depth of about six feet, and approximately twenty feet

⁶¹ John R. Byerly Incorporated. 2019, November 22. Geotechnical Investigation New Elementary School Northeast Corner of Nason Street and Bay Avenue Moreno Valley California.

⁶² ASM Affiliates. 2019, April 26. Cultural Resources Evaluation Letter Report for the Proposed Elementary School at Nason Street and Bay Avenue, City of Moreno Valley, Riverside County, California.

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for storm drain and sewer trenching. Paleontological resource impacts may be significant if substantial deep excavation occurs. Implementation of Mitigation Measure GEO-1 would reduce paleontological resource impacts to less than significant.

GEO-1 Prior to the start of earthwork the District shall retain a qualified paleontologist to monitor grading or excavations that exceed 4 feet below the ground surface.

- The paleontological monitor shall provide construction crews with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources.
- The paleontological monitor shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources.
- If significant paleontological resources are identified they shall be recovered, analyzed in accordance with CEQA guidelines, and curated with the facilities at the Western Center of the Diamond Valley Reservoir in Hemet.

GREENHOUSE GAS EMISSIONS

A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

Would the project:

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

Less Than Significant Impact. Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.⁶³

Information on manufacture of cement, steel, and other “life cycle” emissions that would occur as a result of the project are not applicable and are not included in the analysis.⁶⁴ Black carbon emissions are not included in

⁶³ Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

⁶⁴ Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-

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the GHG analysis because the California Air Resources Board (CARB) does not include this pollutant in the state's AB 32 inventory and treats this short-lived climate pollutant separately.⁶⁵

Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Project-related construction and operation-phase GHG emissions are shown in Table 8. As shown in the table, the proposed project would generate GHG emissions from vehicle trips (e.g., students) energy use (indirectly from purchased electricity use and directly through fuel consumed for building heating), and area sources (e.g., landscaping equipment used on-site, consumer products, coatings). For the purposes of this analysis, the new students are assumed to already use water and generate wastewater and solid waste at their current school facilities. Upon transferring to the proposed elementary school, the students would not generate any additional water/wastewater or waste. Thus, water/wastewater generation and waste disposal were not included as part of the analysis. Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the project. Overall, development and operation of the proposed project would not generate annual emissions that exceed the South Coast AQMD bright-line threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year.⁶⁶ Therefore, the proposed project's cumulative contribution to GHG emissions would be less than significant.

Table 8 Project-Related Operation GHG Emissions

Source	GHG (MTCO _{2e} /Year)
Area	<1
Energy	155
Mobile (Vehicle Trips)	634
Solid Waste	0

specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see California Natural Resources Agency. 2018, November. Final Statement of Reasons for Regulatory Action http://resources.ca.gov/ceqa/docs/2018_CEQA_Final_Statement_of%20Reasons_111218.pdf). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (See Governor's Office of Planning and Research (OPR). 2008, June. CEQA and Climate Change: Addressing Climate Change through CEQA Review. Technical Advisory. <http://opr.ca.gov/docs/june08-ceqa.pdf>).

⁶⁵ Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, Air Quality. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (See California Air Resources Board. 2017, March 14. Final Proposed Short-Lived Climate Pollutant Reduction Strategy. <https://www.arb.ca.gov/cc/shortlived/shortlived.htm>).

⁶⁶ South Coast Air Quality Management District (South Coast AQMD). 2010, September 28. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15. [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf).

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Table 8 Project-Related Operation GHG Emissions

Source	GHG (MTCO ₂ e/Year)
Water	0
Amortized Construction Emissions ¹	31
Total	820
South Coast AQMD Bright-Line Threshold	3,000 MTCO ₂ e/Yr
Exceeds Bright-Line Threshold?	No

Source: CalEEMod, Version 2016.3.2.25.

Notes: MTons = metric tons; MTCO₂e = metric ton of carbon dioxide equivalent

¹ Total construction emission are amortized over 30 years per South Coast AQMD methodology.

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

No Impact. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). A consistency analysis with these plans is presented below.

CARB Scoping Plan

CARB's Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by AB 32, which is to return to 1990 emission levels by year 2020, and SB 32, which is to reduce emissions to 40 percent below 1990 levels by 2030.⁶⁷ The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Since adoption of the Scoping Plan, State agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32 and SB 32. Also, new buildings are required to comply with the current Building Energy Efficiency Standards and California Green Building Code. While measures in the Scoping Plan apply to State agencies and not the proposed project, the project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, the proposed project would not obstruct implementation of the CARB Scoping Plan.

⁶⁷ California Air Resources Board. 2017, November. California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

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SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2016-2040 RTP/SCS was adopted April 7, 2016. The RTP/SCS identifies multimodal transportation investments, include bus rapid transit, light rail transit, heavy rail transit, commuter rail, high-speed rail, active transportation strategies (e.g., bikeways and sidewalks), transportation demand management strategies, transportation systems management, highway improvements (interchange improvements, high-occupancy vehicle lanes, high-occupancy toll lanes), arterial improvements, goods movement strategies, aviation and airport ground access improvements, and operations and maintenance to the existing multimodal transportation system.

The RTP/SCS identifies that land use strategies that focus on new housing and job growth in areas served by high quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in the 2016-2040 RTP/SCS is to provide for a plan that allows the southern California region to grow in more compact communities in existing urban areas; provide neighborhoods with efficient and plentiful public transit and abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands.⁶⁸ The 2016-2040 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecast development that is generally consistent with regional-level general plan data. The projected regional development, when integrated with the proposed regional transportation network identified in the RTP/SCS, would reduce per capita vehicular travel-related GHG emissions and achieve the GHG reduction per capita targets for the SCAG region.

SCAG released the 2020-2045 RTP/SCS (Draft Connect SoCal Plan) on November 7, 2019, and anticipates adoption of the Connect SoCal Plan in May 2020.⁶⁹ The Draft Connect SoCal Plan retains the same purpose as the 2016-2040 RTP/SCS in focusing and providing an integrated approach for accommodating project population growth, household and employment growth, and transportation needs in the SCAG region by year 2045. Similar to the previous RTP/SCS plans, the projected regional development pattern under the Draft Connect SoCal Plan would reduce per capita vehicular-travel-related GHG emissions and achieve the GHG reduction per capita targets for the SCAG region.

The 2016-2040 RTP/SCS and Draft Connect SoCal Plan do not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The proposed project would provide a new school campus for existing and future students within the Moreno Valley Unified School District and would serve the local population. Serving the local community may reduce vehicle miles traveled by adding another school to the Moreno Valley area and providing a closer option for

⁶⁸ Southern California Association of Governments (SCAG). 2016, April 7. Final 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. <http://scagrtpscsc.net/Pages/FINAL2016RTPSCS.aspx>.

⁶⁹ Southern California Association of Governments (SCAG). 2019, November. Draft Connect SoCal Plan: The 2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy of The Southern California Association of Governments. https://www.connectsocial.org/Documents/Draft/dConnectSoCal_Draft-Plan.pdf

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students. Therefore, the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in either the 2016-2040 RTP/SCS or Draft Connect SoCal Plan, and no impact would occur.

HAZARDS AND HAZARDOUS MATERIALS

The analysis in this section is based in part on the following information:

- *Preliminary Environmental Assessment: Proposed Moreno Valley Elementary School – Nason Street*, PlaceWorks, April 2019.

A complete copy of this study is found in the technical appendices of this Initial Study as Appendix E.

Would the project:

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

Less Than Significant Impact. The term “hazardous material” is defined in different ways by different regulatory programs. For purposes of this environmental document, the definition of “hazardous material” is similar to that in the California Health and Safety Code, § 25501:

Hazardous materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.

“Hazardous waste” is a subset of hazardous materials, and the definition is essentially the same as that in the California Health and Safety Code, § 25517, and in the California Code of Regulations, Title 22, § 66261.2:

Hazardous wastes are those that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

A “recognized environmental condition” is defined as the presence or likely presence of hazardous substances or petroleum products in, on, or at a property due to any release to the environment, under any conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.⁷⁰

⁷⁰ ASTM International (ASTM). 2013. Standard E1527-13: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

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Existing Hazardous Materials Present or Potentially Present on the Project Site

Soil Contaminants

A Preliminary Environmental Assessment was conducted to investigate the possibility of residual pesticides present in the soil due to historical agricultural use of the site from at least 1938 to 2004, of residual lead from lead-based paint, and of termiticides from structures that have been on the site since at least 1901.

A total of 82 soil samples were collected from 32 locations from 0 to 0.5 foot bgs and from 2.5 to 3.0 feet bgs. Sample locations were selected based on surface covering, low-lying areas, and proximity to driplines. Step-out sampling collected an additional 36 samples from 18 locations. Pesticide and lead levels in the soil did not exceed California Department of Toxic Substances Control (DTSC) or EPA Region screening levels.⁷¹ The project would not subject people to substantial hazards from recognized environmental conditions.

Asbestos-Containing Materials

Asbestos is the name of a group of silicate minerals that are heat resistant, and thus were commonly used as insulation and fire retardants. Inhaling asbestos fibers has been shown to cause lung disease (asbestosis) and lung cancer (mesothelioma).⁷² Beginning in the early 1970s, a series of bans on the use of certain asbestos-containing materials (ACM) in construction were established by the EPA and the Consumer Product Safety Commission. Most US manufacturers voluntarily discontinued the use of asbestos in certain building products during the 1980s.⁷³

Because the buildings planned for demolition were built in the early 1942, they were tested for asbestos. Samples of suspected ACM were taken throughout the interior and exterior of the buildings. ACM were identified under some linoleum floors and a small portion of roofing material.⁷⁴

During demolition of buildings, asbestos would be removed, contained, and disposed of. Requirements for limiting asbestos emissions from building demolition are specified in South Coast AQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). California Government Code §§ 1529 and 1532.1 provide for exposure limits, exposure monitoring, respiratory protection, and good working practice by workers exposed to lead and ACM. The project would not subject people to substantial hazards from ACM, and impacts would be less than significant.

Lead-Containing Materials

Lead was formerly used as an ingredient in paint (before 1978) and as a gasoline additive; both of these uses have been banned. Lead is listed as a reproductive toxin and a cancer-causing substance; it also impairs the

⁷¹ PlaceWorks. 2019, April. Preliminary Environmental Assessment: Proposed Moreno Valley Elementary School – Nason Street.

⁷² Department of Toxic Substances Control (DTSC). 2017, March 16. Glossary of Environmental Terms. http://www.dtsc.ca.gov/InformationResources/Glossary_of_Environmental_Terms.cfm.

⁷³ US Environmental Protection Agency (USEPA). 2016, December 19. U.S. Federal Bans on Asbestos. <https://www.epa.gov/asbestos/us-federal-bans-asbestos>.

⁷⁴ Cardinal Environmental Consultants, Inc. 2019, December 10. Hazardous Materials Inspection Report. Site: 13636 Nason Street, Moreno Valley, CA 92555.

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development of the nervous system and blood cells in children.⁷⁵ Lead-based paint is defined in the Code of Federal Regulations Title 40 Part 745 as paint or other surface coatings that contain lead equal to or in excess of 1.0 milligram per square centimeter or 0.5 percent by weight. Those demolishing pre-1978 structures may presume the buildings contain lead-based paint without having an inspection.

Due to the age of the buildings to be demolished, coated surfaces (paint, varnish, or glazed) were tested. Lead was identified in some areas of paint, lathing, ceramic wall tile, and porcelain sink and bathtub.

All lead-containing material abatement/removal work must comply with the EPA, US Occupational Safety and Health Administration, and South Coast AQMD regulations. Lead must be contained during demolition activities (California Health and Safety Code §§ 17920.10 and 105255). The Code of Federal Regulations Title 29 Part 1926 establishes standards for occupational health and environmental controls for lead exposure, requirements addressing exposure assessment, methods of compliance, respiratory protection, protective clothing and equipment, hygiene facilities and practices, medical surveillance, medical removal protection, employee information and training, signs, recordkeeping, and observation or monitoring. The project would not subject people to substantial hazards from lead, and impacts would be less than significant.

Soil Import and Export

Any soil that is imported or exported must be chemically tested in accordance with specific written procedures for the sampling, testing, transporting, and certifying of exported and imported fill materials. The project would not subject people to substantial hazards, and impacts would be less than significant.

Demolition and Construction Activities

Demolition of the existing buildings and construction of the new school would include the use of materials such as fuels, lubricants, and greases in construction equipment and coatings used in construction. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature and would cease upon completion of the construction phase.

Once a project is completed and the new facility is operational, hazardous materials that might be handled, used, transported, or disposed of include: standard cleaning products, pesticides, herbicides, paints, fuels, and lubricants used in association with standard campus janitorial, maintenance, and landscaping. In addition, certain curricula, such as chemistry and industrial arts (wood, metal, electronics), could involve the use of small quantities of chemicals, fuels, and other petroleum products, solvents, and paints. Small volumes of hazardous wastes, such as waste paint, batteries, fluorescent lamps, mercury-containing equipment, or unused maintenance products would require management in accordance with standard MVUSD policies and practices. Most hazardous materials stored on school campuses present little risk of upset, since they are generally stored in small containers (30 gallons or less) in designated areas. The amounts of hazardous materials that are handled

⁷⁵ Department of Toxic Substances Control (DTSC). 2017, March 16. Glossary of Environmental Terms. http://www.dtsc.ca.gov/InformationResources/Glossary_of_Environmental_Terms.cfm.

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at any one time are likewise small, reducing the potential consequences of an accident during transport, storage, or handling.

Hazardous materials are regulated by several agencies, including the EPA, DTSC, California Division of Occupational Safety and Health, the Riverside County Department of Environmental Health, and the Riverside County Fire Department (RCFD). Requirements of these agencies would be incorporated into the design and operation of the project and would include providing for and maintaining appropriate storage areas for hazardous materials and installing or affixing appropriate warning signs and labels. Construction contractors are required to comply with worker training, health, and safety; hazardous material containment; off-site transport; and disposal of contaminated soil. Hazards to the public, the students, or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant.

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

Less Than Significant Impact. The use, handling, storage, and disposal of hazardous materials in the course of project construction and operation would not pose a substantial hazard to the public or the environment from reasonably foreseeable accidental release. Compliance with the previously discussed regulations is already standard practice at District schools, including training school staff to safely contain and clean up hazardous materials spills; maintaining hazardous materials spill containment and cleanup supplies on-site; implementing school evacuation procedures as needed; and contacting the appropriate hazardous materials emergency response agency immediately pursuant to requirements of regulatory agencies. Impacts from reasonably foreseeable upset and accident conditions would be less than significant.

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

Less Than Significant Impact. There are no existing or proposed schools within 0.25 mile. The new school would be about 0.5 mile from the existing Moreno ES. Project construction would emit diesel exhaust, which is considered hazardous; however, the construction period would be temporary. Exposure to diesel exhaust would not pose substantial hazards to persons near the site. Project construction and operation would not expose persons on a school campus to substantial hazardous emissions, materials, substances, or waste. Impacts would be less than significant.

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

No Impact. California Government Code § 65962.5 requires that lists of hazardous materials sites be compiled and available to the public. These lists include:

- Hazardous waste facilities subject to corrective action.
- Hazardous waste discharges for which the SWRCB has issued certain types of orders.
- Public drinking water wells containing detectable levels of organic contaminants.

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- Underground storage tanks with reported unauthorized releases.
- Solid waste disposal facilities from which hazardous waste has migrated.

The project site is not included on any list compiled pursuant to California Government Code § 65962.5.⁷⁶ No impacts would occur.

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

No Impact. The nearest airport to the project site is the March Air Reserve Base (MARB), which is approximately 4.3 miles to the southwest. The US Air Force, California Air National Guard, and Montana Air National Guard units based at MARB include airlift, tanker, and fighter units. The project site is outside of MARB's land use compatibility zones, established by the Riverside County Airport Land Use Commission.⁷⁷ The site is also not within an airport influence area.⁷⁸ The project would not result in a new use that would interfere with air traffic patterns or increase air traffic levels or change air traffic patterns. No impact would occur.

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

No Impact. The emergency response plans in effect are the City of Moreno Valley Emergency Operations Plan (EOP)⁷⁹ and MVUSD's Local Hazard Mitigation Plan.⁸⁰

Schools are critical community facilities and are often used as evacuation centers during emergencies. The City of Moreno Valley implements the EOP, which identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses. The EOP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multiagency and/or -jurisdictional responses.⁸¹

The MVUSD Local Hazard Mitigation Plan is designed to identify the hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce

⁷⁶ PlaceWorks. 2019, April. Preliminary Environmental Assessment: Proposed Moreno Valley Elementary School – Nason Street.

⁷⁷ Mead & Hunt. 2014, November 13. March Air Reserve Base / Inland Port Airport Land Use Compatibility Plan. <http://www.rcaluc.org/filemanager/plan/new//17%20-%20Vol.%201%20March%20Air%20Reserve%20Base%20Final.pdf>.

⁷⁸ Riverside County, 2019. Riverside County Parcel Report: APN 488190034. Accessed 22 April 2019. <https://gis.countyofriverside.us/Geocortex/Essentials/REST/TempFiles/Map%20My%20County%20Parcel%20Report.pdf?guid=80b9d961-1196-4393-92e0-2e1eb7968877&contentType=application%2Fpdf>

⁷⁹ City of Moreno Valley. 2019, September 1. Emergency Operations Plan. http://www.moreno-valley.ca.us/city_hall/departments/fire/pdfs/MV-EOP-2019.pdf.

⁸⁰ Moreno Valley Unified School District (MVUSD) 2017. Local Hazard Mitigation Plan. June 2017. <https://1.cdn.edl.io/24R1PSM47RwYyzYLm3zcSRFqNaQ6dNyeR1Bb5ts2RGJl6mWb.pdf>

⁸¹ City of Moreno Valley. 2019, September 1. Emergency Operations Plan. http://www.moreno-valley.ca.us/city_hall/departments/fire/pdfs/MV-EOP-2019.pdf.

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or eliminate long-term risk to people and property from natural and man-made hazards. The plan identifies vulnerabilities, provides recommendations for prioritized mitigation actions, evaluates resources, identifies mitigation shortcomings, and provides future mitigation planning and maintenance of existing plan.⁸² Additionally, the MVUSD has established emergency and evacuation plans for every school in the district.

Project construction and operation of the school would not interfere with any other existing emergency response plans or emergency evacuation plans. No emergency response impact would occur.

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

No Impact. The site has a small residential use and the remaining property is vacant and regularly disked for weed abatement. The surrounding properties are former citrus groves (trees have been removed and land is regularly disked for weed abatement), residential, and institutional uses. There is no wildland susceptible to wildfire on or near the site. Additionally, the project site is not within a fire hazard severity zone as mapped by the California Department of Forestry and Fire Protection (CAL FIRE). The project would not place people or buildings at risk from wildfires, and no impact would occur.

h) Does the proposed school site contain one or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood?

Less than Significant Impact. There are no petroleum or chemical pipelines on the site based on a review of the National Pipeline Mapping System online mapping database. According to the response from Southern California Gas Company, one high-pressure natural gas pipeline is located to the north within 1,500 feet of the project site, underneath Cottonwood Avenue, about 650 feet north of the site. A Pipeline Safety Hazard Assessment was conducted for a proposed school site known as “Proposed School Site at Clemson Court and Bay Avenue” directly adjacent to this same pipeline, which concluded that the pipeline did not pose a significant risk to that proposed school site. Since the project site is farther from the same pipeline at Clemson Court and Bay Avenue and the methodology for calculating the pipeline hazard risk has not changed, there is no significant hazard to the project site from the high-pressure natural gas pipeline.⁸³ Therefore, impacts would be less than significant.

i) Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?

No Impact. A records search of any hazardous waste/substance storage, treatment, or disposal activities at the site and within a 0.25-mile radius of the site was conducted. No evidence of the site being used as a solid

⁸² Moreno Valley Unified School District (MVUSD) 2017. Local Hazard Mitigation Plan. June 2017. <https://1.cdn.edl.io/24R1PSM47RwYyzYLm3zcSRFqNaQ6dNyeR1Bb5ts2RGJl6mWb.pdf>

⁸³ PlaceWorks. 2019, April. Geological and Environmental Hazards Assessment Report: Proposed Moreno Valley Elementary School – Nason Street.

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waste or hazardous waste disposal site was found. There is no indication that aboveground or underground pipelines are located on the school site. Based on information reviewed for preparation of the PEA Report, the proposed site is not located on a current or former disposal site.⁸⁴ No impact would occur.

j) Is the project site a hazardous substance release site identified by the state Department of Health Services in a current list adopted pursuant to § 25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code?

Less than Significant Impact. There are no known site releases. The site was used as a citrus orchard from at least 1938 to 2004. A 500-gallon, above-ground diesel storage tank was removed from the site on July 11, 2017, and a gasoline-powered windmill was removed in early 2018. To evaluate the impact of residual agricultural chemicals and the above-ground storage tank, the site was investigated for arsenic, lead, organochlorine pesticides, and petroleum hydrocarbons. Neither a release of hazardous material nor the presence of a naturally occurring hazardous material which would pose a threat to the public health or the environment under unrestricted land use was indicated. DTSC found that further environmental investigation of the site is not required.⁸⁵ Therefore, impacts would be less than significant.

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?

Less Than Significant Impact. A significant impact would occur if the project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. A significant impact would also occur if the project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB.

New school projects can result in two types of water quality impacts: (1) short-term impacts from discharge of soil through erosion, sediments, and other pollutants during construction and (2) long-term impacts from impervious surfaces (buildings, roads, parking lots, and walkways) that prevent water from being absorbed/soaking into the ground, thereby increasing the pollutants in stormwater runoff. Impervious surfaces can increase the concentration of pollutants, such as oil, fertilizers, pesticides, trash, soil, and animal waste, in stormwater runoff. Runoff from short-term construction and long-term operation can flow directly into lakes, local streams, channels, and storm drains and eventually be released untreated into the ocean.

The proposed project would be constructed in an area that is already developed with streets, residential, institutional, and vacant former agricultural land and that currently generates nonpoint-source pollutants that are carried by storm and irrigation water into storm drains in the surrounding streets. Currently, the Moreno

⁸⁴ PlaceWorks. 2019, April. Preliminary Environmental Assessment: Proposed Moreno Valley Elementary School – Nason Street.

⁸⁵ PlaceWorks. 2019, April. Preliminary Environmental Assessment: Proposed Moreno Valley Elementary School – Nason Street.

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Valley storm drains transport runoff—Line I storm drain starts at Moreno Basin north of SR-60 and runs south along Nason Street. Line I drains south to Line J, then to Line F, and eventually into Canyon Lake, Lake Elsinore, and finally the ocean.^{86,87}

Construction Phase

Clearing, grading, excavation, and construction activities associated with the proposed project have the potential to impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials, such as fuels, solvents, and paints, may present a risk to surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

Construction projects of one acre or more are regulated under the Statewide Construction General Permit (CGP). The proposed project would disturb about nine acres; therefore, the District would comply with the CGP Water Quality Order 2009-0009-DWQ (as amended by Order No. 2010-0014-DWQ and 2012-006-DWQ), which requires the preparation and implementation of a SWPPP. A SWPPP requires the incorporation of BMPs to control sediment, erosion, and hazardous materials contamination of runoff during construction and prevent contaminants from reaching receiving water bodies. Categories of BMPs used in SWPPPs are described in Section 5.7, *Geology and Soils*. The District would comply with all applicable water quality standards and waste discharge requirements. Construction impacts to stormwater quality would be less than significant.

Operation Phase

After completion of the project, ground surfaces would be either hardscape or maintained landscaping. Runoff from buildings and parking lots typically contain oils, grease, fuel, antifreeze, byproducts of combustion (such as lead, cadmium, nickel, and other metals), fertilizers, herbicides, pesticides, soil erosion, and other pollutants. Precipitation at the beginning of the rainy season may result in an initial stormwater runoff (first flush) with high pollutant concentrations.

Waste discharge requirements to municipal storm drain systems (MS4s) in the Riverside County portion of the Santa Ana River Watershed are set forth in Order No. R8-2010-0033, NPDES Permit No. CAS618033, issued by the Santa Ana Regional Water Quality Control Board (RWQCB).⁸⁸ The Riverside County Flood Control and Water Conservation District Standard Manual was developed as part of the municipal stormwater program to address stormwater pollution from new developments and redevelopment projects.

⁸⁶ Moreno Valley. 2019. Storm Drain Pollution Prevention, National Pollutant Discharge Elimination System (NPDES): Do You Know Where the Water Goes? Accessed April 25, 2019. http://www.moreno-valley.ca.us/resident_services/waste/stormwater.shtml

⁸⁷ Riverside County. 2015. Riverside County Flood Control and Water Conservation District Master Drainage Plan: Moreno. Updated April 2015. http://rcflood.org/Downloads/Master%20Drainage%20Plans/Updated/Zone%204/Maps/MorenoMDP_map.pdf

⁸⁸ Riverside County Flood Control and Water Conservation District. 2019. Riverside County Watershed Protection. SANTA ANA WATERSHED PROTECTION PROGRAM <http://rcflood.org/npdes/SantaAnaWS.aspx>

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According to the Santa Ana RWQCB MS4 permit, this project would be classified a “priority development project” because it would create more than 10,000 square feet of impervious surfaces. Therefore, a water quality management plan (WQMP) would be required.

As part of the WQMP, source control BMPs are designed to minimize the potential for pollutants to come into contact with stormwater, thereby limiting the potential for water quality impacts downstream. A variety of source control BMPs would be incorporated into the project. The largest BMP is the detention basin. The southeast corner of the campus would have an 11,000-square-foot biofiltration detention basin to hold stormwater runoff from the school campus. This volume and treatment control BMP would temporarily detain water from a 24-hour, 85th percentile storm event and remove pollutants of concern from on-site runoff. Stormwater would flow to the basin and would draw down slowly and drain into the Line I underground storm drain in Nason Street.

Also, as part of the WQMP, the site would be developed using low impact development (LID) principles. LID reduces the impacts of runoff and stormwater pollution as close to their source as possible. LID employs principles such as preserving and recreating natural landscape features and minimizing effective imperviousness to create functional and appealing site drainage that treats stormwater as a resource rather than a waste product. There are many practices that have been used to adhere to these principles, such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. By implementing LID principles and practices, water can be managed in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed. Applied on a broad scale, LID can maintain or restore a watershed's hydrologic and ecological functions.⁸⁹ The District would comply with the Riverside County Low Impact Development BMP Design Handbook.⁹⁰

The District would comply with all State, County, and local regulations regarding stormwater runoff during construction and operational phases of the project. Therefore, water quality standards and waste discharge requirements would not be exceeded, and surface water and groundwater quality would not be degraded. Impacts would be less than significant.

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

Less Than Significant Impact. The project site is above the San Jacinto Groundwater Basin.⁹¹ The Eastern Municipal Water District (EMWD) supplies water to the project site and the surrounding communities. Groundwater wells in Hemet Perris Valley, Moreno Valley, Murrieta, and San Jacinto produce 25 percent of EMWD's water supply.⁹² Based on the geotechnical investigations, groundwater has historically been at a depth

⁸⁹ US Environmental Protection Agency. 2016, December 14. Urban Runoff: Low Impact Development. <https://www.epa.gov/nps/urban-runoff-low-impact-development>.

⁹⁰ County of Riverside, 2011, Low Impact Development BMP Design Handbook. <http://www.floodcontrol.co.riverside.ca.us/NPDES/LIDBMP.aspx>

⁹¹ California Department of Water Resources (DWR). 2019, February. Groundwater Information Center Interactive Map Application: Bulletin 118 Groundwater Basins. <https://gis.water.ca.gov/app/gicima/>

⁹² Eastern Municipal Water District (EMWD). 2019. Water Supply. Accessed April 25, 2019. <https://www.emwd.org/water-supply>

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greater than 100 feet below existing grade.⁹³ The proposed project does not include new groundwater wells that would extract groundwater from the aquifer. Construction and operation of the proposed project would not lower the groundwater table or deplete groundwater supplies. Furthermore, the site does not provide intentional groundwater recharge. Therefore, the proposed project would not interfere with groundwater recharge. Impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in a substantial erosion or siltation on- or off-site?

Less Than Significant Impact. There are no streams or rivers on the project site, and project would not involve the alteration of any natural drainages or watercourses.

Construction Phase

During construction, the existing drainage pattern of the site would be altered. Construction-related activities that expose soils to rainfall/runoff and wind are primarily responsible for erosion. Construction activities would expose soil through excavation, grading, and trenching. Project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP described in Section 5.7.b, *Geology and Soils*. These requirements include provisions for erosion and pollution control measures to maintain water quality standards in stormwater runoff. Impacts would be less than significant.

Operation Phase

Upon project completion, drainage from the new school would flow to the biofiltration detention basin and then to Canyon Lake via existing storm drains on Nason Street. The off-site existing drainage pattern would not change. The entire project site would be developed with buildings, parking lots, hardcourts, walkways, playfields, and landscaped areas. The southeast corner of the campus would have a biofiltration detention basin. Stormwater would flow to the basin and would draw down slowly, and treated water would drain into underground storm drains in Nason Street. The biofiltration detention basin would be designed and constructed in compliance with County of Riverside water quality regulations. The project would not alter drainage in a way that would cause substantial erosion. Impacts would be less than significant.

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

Less Than Significant Impact. Drainage from the site would flow to the new biofiltration detention basin and then to Canyon Lake via existing storm drains on Nason Street. As discussed in threshold 5.10(a), the site would be developed using LID principles. Pursuant to LID standards, the drainage system would

⁹³ John R. Byerly Incorporated. 2019, November 22. *Geotechnical Investigation New Elementary School Northeast Corner of Nason Street and Bay Avenue Moreno Valley California.*

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manage runoff in a way that reduces the impact of built areas and promotes the natural movement of water within an ecosystem or watershed. Thus, project development would not result in flooding on- or off-site, and impacts would be less than significant.

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

Less Than Significant Impact. Project development would not result in runoff exceeding the capacity of the municipal storm drain system. Development of the project would not cause substantial water pollution, as discussed under 5.10(a). Runoff water impacts would be less than significant.

iv) Impede or redirect flood flows?

No Impact. The project site is outside of any dam inundation zones⁹⁴ and 100-year flood zones.⁹⁵ Therefore, project implementation would not impede or redirect flood flows and no impact would occur.

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

No Impact. The project site is outside of 100-year flood zones.⁹⁶

A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam or other artificial body of water. There are no reservoirs or water storage tanks, at or above ground level, that would pose a flood hazard to the site due to a seiche.

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The project site is approximately 45 miles inland from the Pacific Ocean. Therefore, the project site is outside the tsunami hazard zone and would not be affected by a tsunami.

The proposed project would not release pollutants as the result of floods, tsunami, or seiche. No impact would occur.

⁹⁴ California Department of Water Resources (DWR). 2019. Dam Breach Inundation Map Web Publisher.
https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2

⁹⁵ Federal Emergency Management Agency (FEMA). 2008, August 28. FEMA Flood Map Service Center: Search By Address.
<https://msc.fema.gov/portal/search?AddressQuery=13636%20Nason%20St%20Moreno%20Valley%2C%20CA%2092555#searchresultsanchor>

⁹⁶ Federal Emergency Management Agency (FEMA). 2008, August 28. FEMA Flood Map Service Center: Search By Address.
<https://msc.fema.gov/portal/search?AddressQuery=13636%20Nason%20St%20Moreno%20Valley%2C%20CA%2092555#searchresultsanchor>

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

No Impact. Project construction would be subject to the Statewide Construction General Permit and implementation of BMPs specified in the SWPPP. After completion of the project, ground surfaces would be either hardscape or maintained landscape. The project would not affect groundwater and would not obstruct implementation of a sustainable groundwater management plan. Refer to 5.10(a), above. Therefore, no impact would occur.

LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. The project site and surrounding land consists of schools, residences, commercial, and church uses. School sites, unlike highways, transmission lines, and other aboveground infrastructure, do not have a physical presence that would divide established communities. Moreover, schools already are attended by members of the community and would therefore continue to serve as important places of community interaction. Neighborhood schools are an integral part of the surrounding community, and therefore do not create or constitute physical divisions. The project would not divide an established community. 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?

Less Than Significant Impact. The site has a General Plan land use designation of Residential (R3)⁹⁷ and is zoned R3 (Residential 3 District).⁹⁸

The purpose of the R3 zoning is to provide a transition between rural- and urban-density development areas and to provide for a suburban lifestyle on residential lots larger than those commonly found in suburban subdivisions. Schools are typically located in residential areas because schools serve students that live in residential areas.

Although the project site is zoned residential, the California legislature granted school districts the power to exempt school property from local zoning requirements, provided that the school district complies with the terms of Government Code § 53094. As lead agency for the proposed project, MVUSD will comply with Government Code § 53094 to render the local City of Moreno Valley Zoning Ordinance inapplicable to the site. MVUSD will initiate the following criteria for implementation of the City of Moreno Valley land use overrides:

⁹⁷ Moreno Valley General Plan, Adopted Land Use Map. 2019, October 10. http://www.moreno-valley.ca.us/city_hall/general-plan/landuse-map.pdf

⁹⁸ City of Moreno Valley Zoning Map. 2019, October 10. <http://www.moreno-valley.ca.us/cdd/pdfs/ZoningMap.pdf>

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- Two-thirds of the MVUSD Board of Education must vote to render a City zoning ordinance inapplicable to a proposed use of property by the school district.
- Within 10 days of taking the action, the MVUSD Board of Education or their designee must provide the City with notice of the action under Government Code § 53094.

The new school would not conflict with existing plans, policies, or regulations adopted for the purpose of avoiding or mitigating environmental effects. Impacts would be less than significant.

MINERAL RESOURCES

Would the project:

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

No Impact. The project site is mapped as an “urban area” by the California Geological Survey, and significant mineral resources are not known to be present or are considered unlikely to be present.⁹⁹ The Jack Rabbit Canyon Quarry was once a sand and gravel quarry in the city, but it has been inactive since 2001.¹⁰⁰ No active mines or oil fields are mapped within the city.^{101,102} Therefore, the project would not cause a loss of availability of a known mineral resource valuable to the region and the state, and no impact would occur.

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

No Impact. According to the City of Moreno Valley General Plan, mineral resources in the city are common materials such as sand, gravel, and rock. The most recently active quarry within the City’s sphere of influence was the Jack Rabbit Canyon Quarry, which has been listed as inactive since 2001.¹⁰³ There are no locally important mineral resources on or near the project site. Therefore, project development would not cause a loss of availability of a resource, and no impact would occur.

NOISE

A background discussion on the noise and vibration fundamentals, applicable regulations, and noise modeling can be found in Appendix F.

⁹⁹ California Geological Survey (CGS). Updated Mineral Land Classification Map for Portland Cement Concrete-Grade Aggregate in the San Bernardino Production-Consumption Region, San Bernardino and Riverside Counties, California. Special Report 206, Plate 1. [ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_206/SR206_Plate1.pdf](http://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_206/SR206_Plate1.pdf)

¹⁰⁰ City of Moreno Valley. 2006, July 11. Moreno Valley General Plan. http://www.moreno-valley.ca.us/city_hall/general-plan/06gpfinal/gp/gp-tot.pdf.

¹⁰¹ Office of Mine Reclamation (OMR). 2020, January 8. Mines Online. <http://maps.conservation.ca.gov/mol/index.html>.

¹⁰² Division of Oil, Gas, and Geothermal Resources (DOGGR). 2020, January 8. DOGGR Well Finder. <https://maps.conservation.ca.gov/doggr/wellfinder/#/-117.22429/33.91774/13>

¹⁰³ City of Moreno Valley. 2006, July 11. Moreno Valley General Plan. http://www.moreno-valley.ca.us/city_hall/general-plan/06gpfinal/gp/gp-tot.pdf.

5. Environmental Analysis

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?**

Less Than Significant Impact. Noise is unwanted or harmful sound; sound that is too loud is distracting or, worse, injurious. The State of California and City of Moreno Valley have established noise standards to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction.

Existing Noise Environment. The project site is between residential uses to the south and a Lutheran church to the north along Nason Street. To the east and west of the site, there is open undeveloped space. Based on the General Plan's Safety Element Noise Contours, the site is within the 60 and 65 CNEL noise contour. The site is primarily influenced by traffic noise from local traffic.

Sensitive Receptors. Certain land uses are particularly sensitive to noise and vibration, such as residences, schools, hospitals, churches, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. The nearest sensitive receptors to the project site are a Lutheran church to the north and single-family residential to the south.

Applicable Noise Standards

State

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a general plan that includes a noise element, which is to be prepared according to guidelines adopted by the Governor's Office of Planning and Research. The purpose of the noise element is to "limit the exposure of the community to excessive noise levels."

CALGreen. California's noise insulation standards for nonresidential uses are codified in CALGreen. CALGreen noise standards are applied to new or renovation construction projects to control interior noise levels resulting from exterior noise sources. Projects may use either the prescriptive method (24 CCR Part 11 § 5.507.4.1) or the performance method (§ 5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA $L_{eq}(1hr)$.

Title 5 § 14040(q). Under Title 5 (CCR), the California Department of Education (CDE) regulations require the school district to consider noise in the site selection process. As recommended by CDE guidance, if a school district is considering a potential school site near a freeway or other source of noise, it should hire an acoustical engineer to determine the level of sound that the site is exposed to and to assist in designing the school should that site be chosen.

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Local

The City of Moreno Valley regulates and enforces noise through standards in its municipal code, chapter 11.80, Noise Regulation. The City noise standards for stationary sources are summarized in Table 9. The municipal code provides exemptions to the standards for sounds produced by school assemblies, organized sporting events, and school playground activities (§ 11.80.030(E)(7)).¹⁰⁴

Table 9 City of Moreno Valley Exterior Noise Standards

Land Use Category	Time Period	Noise Level, dBA
Residential ^a	8:00 am–10:00 pm	60
	10:00 pm–8:00 am	55
Commercial ^b	8:00 am–10:00 pm	65
	10:00 pm–8:00 am	60

Source: City of Moreno Valley Municipal Code.

^a Residential means all uses of land primarily for dwelling units, as well as hospitals, schools, colleges and universities, and places of religious assembly.

^b Commercial means all uses of land not otherwise classified as residential, as defined in in § 11.80.0220 of the Municipal Code

Under § 11.80.030, Prohibited Acts (D)(7), construction and demolition activities are limited to the hours of 7:00 am to 8:00 pm any day of the week. The total duration for project construction is approximately 18 months. Construction equipment is anticipated to include graders, excavators, tractors, loaders, backhoes, forklifts, air compressors, bulldozers, and trucks.

Two types of short-term noise would occur: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul and (2) stationary-source noise from construction equipment.

Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along access roadways. Individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA L_{max} at 50 feet from the vehicle. Most of the haul trips would occur during grading. However, these occurrences would generally be infrequent and for a short duration.

Site access would be via Nason Street. Nason Street and roadways in the immediate vicinity of the project have average daily traffic volumes (ADT) greater than 1,000 trips.¹⁰⁵ Maximum overlapping daily trips from workers, material vendors, and haul trucks would be about 239. When comparing maximum construction-related trips to existing ADT volumes, construction generated trips would result in less than 1 dBA CNEL increase, which is negligible in outdoor noise environments. This temporary increase would result in a less-than-significant impact.

¹⁰⁴ City of Moreno Valley. December, 2018. Moreno Valley Municipal Code. Chapter 11.80, Noise Regulation.
<https://qcode.us/codes/morenovalley/>

¹⁰⁵ EPD Solutions April 23, 2020. Moreno Valley Elementary School Traffic Impact Analysis

5. Environmental Analysis

Construction Equipment

Noise generated by on-site construction equipment is characterized by the type of equipment used, its location relative to sensitive receptors, the time of day, and duration of activities. Each stage of construction involves different kinds of equipment with distinct noise characteristics. Construction noise is dominated by the loudest equipment, which would be the largest piece of heavy equipment with powerful engines, although other noise, such as dropping of materials or tools, would be noticeable.

The noise produced during each construction stage is calculated by combining the L_{eq} contributions from each piece of equipment used at the same time while accounting for the ongoing time-variations of noise emissions. Heavy equipment, such as a bulldozer or a loader, can have a maximum noise level of up to 85 dBA at 50 feet. However, overall noise and receptor noise levels vary considerably depending on the specific activity, distance-based noise attenuation, the number and type of equipment, and the load and engine size. Noise levels from project-related construction activities were calculated based on the simultaneous use of all applicable construction equipment at spatially averaged distances (i.e., from the acoustical center of the entire construction area) to the property line of the nearest receptors. This method is used because the area around the center of construction activities best represents the potential average construction-related noise levels at the surrounding various sensitive receptors.

The expected construction equipment mix was categorized by construction activity using the Federal Highway Administration's Roadway Construction Noise Model. The aggregate sound levels—grouped by construction activity—are summarized in Table 10.

Table 10 Project-Related Construction Noise

Construction Activity Phase	Lutheran Church (north) and Residential (south) At 300 feet, dBA L_{eq}
Demolition	69
Site Preparation	67
Rough Grading	69
Utilities Trenching	61
Building Construction	67
Paving	68
Architectural Coating	58
Finish/Landscaping	61

Notes: Calculations performed with the Federal Highway Administration's Roadway Construction Noise Model software are in Appendix F of this Initial Study. Distance measurements were taken from the acoustical center of the construction area using Google Earth 2020. Decibels are rounded to the nearest whole number.

The Moreno Valley Municipal Code limits construction activities to the hours of 7:00 am to 8:00 pm on any day of the week. In the absence of quantified construction noise level standards from the City, the Federal Transit Administration's recommended threshold of 80 dBA $L_{eq(8hr)}$ is used in this analysis.¹⁰⁶ As shown in Table

¹⁰⁶ Federal Transit Administration (FTA). 2018, September. Transit Noise and Vibration Impact Assessment.

5. Environmental Analysis

10, construction-related noise levels would not exceed the 80 dBA $L_{eq(8hr)}$ threshold at the nearest sensitive receptors. Therefore, construction noise impacts would be less than significant.

Traffic Noise

Changes in noise levels can be divided into three categories: audible, potentially audible, and inaudible. “Audible” changes in noise are perceptible to humans. Audible changes generally refer to a change greater than 3 dBA since this level has been found to be the threshold of perceptibility in exterior environments. “Potentially audible” refers to a change in noise level between 1 and 3 dBA. Changes in noise level of less than 1 dBA are typically “inaudible” to humans except under quiet conditions in controlled environments. For the purposes of this analysis, a traffic noise increase is considered significant if it would be greater than 3 dBA CNEL and would result in future exterior ambient noise levels greater than 65 dBA CNEL (Policy 6.3.1 of the Moreno General Plan requires mitigation for new sensitive uses where the projected noise level would exceed 65 dBA CNEL). For cumulative impacts, a traffic noise increase impact is considered significant if it would be greater than 3 dBA CNEL, the project would contribute more than 1 dBA to the cumulative increase, and the resulting future ambient noise level would exceed 65 dBA CNEL.

The daily traffic volumes along roadways and the Federal Highway Administration traffic noise prediction model were used to determine the noise increase. This analysis compares the existing plus project traffic volumes to the existing traffic volumes to estimate the increase due to the project. The same method is used to determine the cumulative traffic noise level increase (cumulative plus project traffic volumes compared to the existing traffic volumes). Table 11 shows project-related and cumulative traffic noise increases estimated for study roadway segments. Project-related increases would not exceed 3 dBA, and project-related traffic noise increases would be less than significant.

Cumulative traffic noise increases would exceed 3 dBA at one roadway segment, Cottonwood Avenue west of Moreno Beach Drive, by 0.5 dBA. However, the resulting future ambient noise level would remain below 65 dBA CNEL; therefore, this would be a less than significant impact.

Table 11 Project-Related Increase in Traffic Noise

Roadway Segment	Traffic Condition, dBA CNEL				Project Noise Increase (dBA)	Cumulative Noise Increase (dBA)	Project Contribution to Cumulative Increase (dBA)
	Existing	Existing Plus Project	Future No Project	Future Plus Project			
Lasselle Street- north of Cottonwood Avenue	66.7	67.2	67.2	67.7	0.5	1.0	0.4
Lasselle Street - Cottonwood Avenue to Alessandro Boulevard	68.3	68.4	69.2	69.3	0.1	1.0	0.1
Cottonwood Avenue - Lasselle Street to Morrison Street	67.3	67.9	68.1	68.7	0.6	1.4	0.5
Cottonwood Avenue - west of Lasselle Street	67.5	67.7	68.3	68.4	0.2	1.0	0.2
Morrison Street - north of Cottonwood Avenue	67.7	67.9	68.2	68.4	0.2	0.7	0.2
Morrison Street - Cottonwood Avenue to Alessandro Boulevard	66.7	67.0	67.3	67.5	0.3	0.8	0.2
Cottonwood Avenue - Morrison Street to Nason Street	68.4	69.2	69.0	69.7	0.8	1.3	0.7

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Table 11 Project-Related Increase in Traffic Noise

Roadway Segment	Traffic Condition, dBA CNEL				Project Noise Increase (dBA)	Cumulative Noise Increase (dBA)	Project Contribution to Cumulative Increase (dBA)
	Existing	Existing Plus Project	Future No Project	Future Plus Project			
Cottonwood Avenue - Lasselle Street to Morrison Street	67.5	68.1	68.1	68.6	0.6	1.1	0.5
Nason Street - north of Eucalyptus Avenue	71.4	71.5	72.0	72.2	0.1	0.8	0.1
Nason Street - Eucalyptus Avenue to Cottonwood Avenue	73.0	73.3	73.7	73.9	0.2	0.9	0.2
Eucalyptus Avenue- east of Nason Street	66.1	66.3	66.7	66.9	0.2	0.8	0.2
Eucalyptus Avenue- west of Nason Street	67.7	67.9	68.3	68.5	0.2	0.7	0.1
Nason Street - Eucalyptus Avenue to Cottonwood Avenue	71.2	71.6	71.9	72.3	0.4	1.1	0.4
Cottonwood Avenue- east of Nason Street	62.2	64.0	62.9	64.5	1.8	2.3	1.6
Cottonwood Avenue - Morrison Street to Nason Street	66.0	67.6	66.9	68.2	1.5	2.1	1.3
Nason Street - south of Bay	71.7	72.0	72.5	72.7	0.3	1.0	0.3
Nason Street - Alessandro Boulevard to Bay Avenue	71.7	72.0	72.4	72.7	0.3	1.0	0.3
Nason Street - Alessandro Boulevard to Cactus Avenue	71.6	71.7	72.5	72.6	0.1	1.0	0.1
Alessandro Boulevard - east of Nason Street	69.1	69.4	69.8	70.1	0.3	1.0	0.2
Alessandro Boulevard -Morrison Street to Nason Street	69.1	69.3	70.2	70.4	0.1	1.2	0.1
Moreno Beach Drive - north of Cottonwood Avenue	69.6	69.8	70.5	70.6	0.2	1.1	0.2
Moreno Beach Drive - Cottonwood to Alessandro Boulevard	70.5	70.6	71.4	71.4	0.1	0.9	0.1
Cottonwood Avenue - east of Moreno Beach	62.3	63.1	62.8	63.5	0.8	1.2	0.7
Cottonwood Avenue- west of Moreno Beach	60.9	63.5	62.4	64.4	2.6	3.5	2.0
Moreno Beach Drive - Cottonwood Avenue to Alessandro Boulevard	70.9	71.1	71.6	71.7	0.2	0.9	0.2
Moreno Beach Drive- south of Alessandro Boulevard	71.2	71.2	71.9	71.9	0.1	0.7	0.0
Alessandro Boulevard - east of Moreno Beach Drive	67.2	67.4	68.2	68.4	0.3	1.3	0.2
Alessandro Boulevard - east of Nason Street	69.1	69.3	69.8	70.0	0.2	0.9	0.2
Nason Street - project to Cottonwood Avenue	71.7	73.1	72.5	73.7	1.4	2.0	1.2
Nason Street - project to Bay Avenue	71.7	72.7	72.5	73.3	1.0	1.6	0.8
Nason Street - north of Dracaea Avenue	71.7	71.9	72.3	72.5	0.2	0.9	0.2
Nason Street - south of Dracaea Avenue	71.5	71.8	72.1	72.4	0.4	1.0	0.3
Dracaea Avenue - east of Nason Street	55.0	55.0	55.4	55.4	0.0	0.4	0.0
Dracaea Avenue - west of Nason Street	63.7	64.1	64.1	64.5	0.4	0.8	0.4

Traffic Data Source: EPD Solutions 2020.

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Stationary Noise

Mechanical Equipment

Heating, ventilation, and air conditioning (HVAC) systems would be installed at the new proposed buildings. The nearest sensitive receptor property line to the HVAC equipment would be the existing church to the north at approximately 100 feet. The municipal code extends the residential daytime and nighttime noise standards of 60 dBA and 55 dBA to places of religious assembly for stationary noise sources. Typical HVAC equipment generates noise levels ranging up to 72 dBA at distance of 3 feet. At a distance of 100 feet, noise levels would attenuate to 42 dBA. Therefore, this impact would be less than significant.

Student Recreational Noise

The new elementary school would serve students attending grades K-5. It would operate on a traditional two-semester academic calendar, with operational hours starting at 7:45 AM and ending at 2:25 PM. The proposed Moreno Elementary School would have outdoor turf play fields (overlapping baseball and soccer fields), hard courts, and a kindergarten playground. These areas would be mostly used during recreational hours such as lunchtime/recess and for physical education during daylight hours, since permanent nighttime lighting is not proposed. Though recreational noise from students could periodically increase ambient noise levels in the project vicinity, given that no nighttime lighting or public address system is proposed for recreational activities, noise increases would not be substantial. In addition, activities conducted on school playgrounds are exempt from the noise standards of the municipal code. Recreational noise would be less than significant.

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

Less Than Significant Impact. Construction and operational activities are analyzed for the potential to generate excessive groundborne vibration or groundborne noise. This analysis looks at the vibration impacts on sensitive structures related to short-term and operational activity.

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

The threshold at which there is a risk of architectural damage to normal houses with plastered walls and ceilings is 0.2 inch per second peak particle velocity (in/sec PPV).¹⁰⁷ Table 12 summarizes vibration levels for typical construction equipment at a reference distance of 25 feet. Typical construction equipment can generate vibration levels ranging up to 0.21 in/sec PPV at 25 feet. Vibration levels at a distance greater than 25 feet would attenuate to 0.2 in/sec PPV or less. No blasting, pile driving, or hard rock ripping/crushing activities are

¹⁰⁷ Federal Transit Administration (FTA). 2018, September. Transit Noise and Vibration Impact Assessment. United States Department of Transportation. FTA-VA-90-1003-06.

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anticipated during project construction. The nearest sensitive receptors are a Lutheran church to the north and single-family homes to the south. These structures are approximately 100 feet or further from the edge of the project site. Projected vibration levels at 100 feet are shown in Table 12. Vibration levels at the nearest receptors (100 feet) would be well below the threshold of 0.2 in/sec PPV; therefore, construction vibration impacts would be less than significant.

Table 12 Vibration Levels for Typical Construction Equipment

Equipment	PPV (in/sec) at 25 feet	PPV (in/sec) at 100 feet
Vibratory Roller	0.21	0.026
Large Bulldozer	0.089	0.011
Loaded Trucks	0.079	0.010
Jackhammer	0.035	0.004
Small Bulldozer	0.003	<0.001

Source: Federal Transit Administration (FTA). 2018, September. *Transit Noise and Vibration Impact Assessment*.

Operational Vibration

The operation of the project would not include any substantial long-term vibration sources. No vibration impacts from operation would occur.

Groundborne Noise

Construction-related groundborne noise occurs mainly from the powered mechanical equipment for rock breaking/drilling works and tunnel boring machines. Operation-related groundborne noise occurs when trains operate in tunnels that are close to occupied structures. The project does not include activities or equipment that would generate substantial construction or operational groundborne noise. No impacts would occur.

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

No Impact. The nearest airport, private or public, is the March Air Reserve Base, approximately four miles southwest of the proposed project.¹⁰⁸ The project would not expose people residing or working in the project area to excessive noise levels. Noise impacts from airports would not occur.

POPULATION AND HOUSING

Would the project:

¹⁰⁸ Airnav, LLC. 2019. Airport Information. Accessed, February 19, 2020. <http://www.airnav.com/airports>.

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- d) **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 roads or other infrastructure)?**

No Impact. New roads, expanded utility lines, large employment centers, and housing are projects that could induce population growth. The project would not extend infrastructure into currently unserved areas, as the site is already served by utility laterals. The new school would serve students already living in the area and attending other schools. No impacts related to population growth would occur.

- e) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

No Impact. The proposed project would include the demolition of a single-family home, 13636 Nason Street (APN 488-190-034), that is no longer occupied. Project development would not require relocation, nor would it necessitate the construction of replacement housing elsewhere; therefore, no impacts would occur.

PUBLIC SERVICES

Would the project 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:

- a) **Fire protection?**

Less Than Significant Impact. Moreno Valley Fire Department (MVFD) currently provides fire protection and emergency medical services to the city of Moreno Valley. MVFD is part of the CAL FIRE/Riverside County Fire Department's regional, integrated, cooperative fire protection organization.¹⁰⁹ MVFD operates seven fire stations—Station 99 at 13400 Morrison Street is 0.8 mile northwest of the project site, and Station 58 at 28040 Eucalyptus Avenue is 1.9 miles northeast. The proposed project involves transferring students from the existing Moreno ES to the new school and accommodating up to 950 students. Project development would not induce population growth in the area and would not require construction of new or expanded fire stations. Impacts would be less than significant.

- b) **Police protection?**

Less Than Significant Impact. The Riverside County Sheriff's Department has provided police protection and crime prevention services for the city since 1985 as the Moreno Valley Police Department (MVPD).¹¹⁰ A sheriff's captain acts as the chief of police for the MVPD. The MVPD has a station at 22850 Calle San Juan De Los Lagos, 4.7 miles west of the project site. The project may cause a very slight increase in demands for

¹⁰⁹ City of Moreno Valley. 2020, January 9. Fire Department. http://www.moreno-valley.ca.us/city_hall/departments/fire/index-fire.shtml

¹¹⁰ City of Moreno Valley. 2006, July 11. Moreno Valley General Plan. http://www.moreno-valley.ca.us/city_hall/general-plan/06gpfinal/gp/gp-tot.pdf.

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police services during construction due to possible trespass, theft, and/or vandalism. Active construction areas would be fenced, and any increase in demand for police would be temporary and would not require construction of new or expanded police facilities. The proposed project would not increase student population in the District and would not result in new adverse impacts on existing police service. Impacts would be less than significant.

c) Schools?

No Impact. School services are related to the size of the residential population, the geographic area served, and community characteristics. The proposed project would not increase the population in the attendance boundary or otherwise increase demand for school services. The proposed project would be a benefit to the existing and future students, staff, and community. No impact would occur.

d) Parks?

No Impact. Impacts to public parks and recreational facilities are generally caused by population or employment growth. The proposed project would not increase population or significantly increase employment. Therefore, physical impacts to parks and recreation from increased population growth would not occur. No impacts to parks would occur.

e) Other public facilities?

No Impact. The proposed project would not result in impacts associated with the provision of other new or physically altered public facilities (e.g., libraries, hospitals, childcare, teen or senior centers). Physical impacts to public services are usually associated with population in-migration and growth, which increase the demand for public services and facilities. The proposed project would not induce population growth. No impacts to other public facilities would occur.

RECREATION

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?

No Impact. The proposed project involves the construction of a new school and would include physical education facilities (consisting of a multipurpose room/gym, play yards and outdoor space) for school use. Students would not use off-campus recreation facilities. Therefore, it would not increase the use of existing neighborhood and regional parks or other recreational facilities and would not cause physical deterioration of these facilities. No impacts would occur.

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

No Impact. The project involves the construction of a multipurpose room/gym, play yards and outdoor space. The environmental effects of the construction and operation are considered throughout the environmental analysis in this Initial Study. The project would not require the construction or expansion of additional

5. Environmental Analysis

recreational facilities, which could have an adverse effect on the environment. No adverse physical effect on the environment would occur.

TRANSPORTATION

The analysis in this section is based in part on the following information:

- *Moreno Valley Elementary School: Traffic Impact Analysis*, EPD Solutions, Inc., April 2020.

A complete copy of this study is in the technical appendices of this Initial Study as Appendix G.

Existing Setting

ROADWAYS

Study area roadways are described below and shown on Figure 9, *Project Study Area*. Roadway classifications are identified in the City of Moreno Valley General Plan Circulation Element (2006).

Nason Street. This north-south roadway varies from four lanes north of Iris Avenue to two lanes north of Alessandro Boulevard to Lenzen Street and back to four lanes from Vinewood Place to Elder Avenue. It is classified a Modified Divided Major Arterial roadway from Iris Avenue to Ironwood Avenue. There are raised medians with curbs south of the Nason Street and Cactus Avenue intersection, north of the Nason Street and Bay Avenue intersection, and north of the Nason Street and Dracaea Avenue intersection.

Cottonwood Avenue. This east-west roadway varies from four lanes west of Redlands Boulevard to Wilmot Street to two lanes east of Letterman Street. It is classified a Modified Minor Arterial roadway from Old 215 Frontage Road to Redlands Boulevard.

Lasselle Street. This north-south roadway varies from four lanes north of Casa Encantador Road to Alessandro Boulevard to a two-lane road north of Alessandro to Dracaea Avenue and back to four lanes north of Dracaea to Eucalyptus Avenue. It is classified an Arterial roadway.

Alessandro Boulevard. This east-west roadway is two lanes west of Redlands Boulevard to Blue-Ribbon Lane and four lanes west of Blue Ribbon Lane to Morrison Street. Alessandro Boulevard has three lanes west of Morrison Street to Darwin Drive, where it goes back to two lanes. It is classified a Divided Major Arterial roadway. There is a raised median with a curb east of Darwin Drive to Blue-Ribbon Lane.

Moreno Beach Drive. This north-south roadway is in the study area. It is classified a Divided Major Arterial roadway. There are raised medians with curbs south of Brodiaea Avenue and south of Eucalyptus Avenue to just past Auto Mall Drive.

Eucalyptus Avenue. This east-west roadway is four lanes east of Golden Lantern Drive and three lanes west of Golden Lantern Drive to Wichita Way. West of Wichita Way to Lasselle Street Eucalyptus Avenue is four lanes. It is classified an Arterial roadway within the study area.

Dracaea Avenue. This is an east-west two-lane local roadway in the study area.

5. Environmental Analysis

INTERSECTIONS

The following intersections were analyzed based on project trip distribution; eight intersections are signalized and three are unsignalized.

1. Lasselle Street / Cottonwood Avenue
2. Morrison Street / Cottonwood Avenue
3. Nason Street / Eucalyptus Avenue
4. Nason Street / Cottonwood Avenue
5. Nason Street / Bay Avenue (Unsignalized)
6. Nason Street / Alessandro Boulevard
7. Moreno Beach Drive / Cottonwood Avenue
8. Moreno Beach Drive / Alessandro Boulevard
9. Nason Street / Project Driveway (Unsignalized) (future intersection)
10. Project Driveway / Bay Avenue (Unsignalized) (future intersection)
11. Nason Street / Dracaea Avenue

PEDESTRIAN AND BICYCLE FACILITIES

There are sidewalks and bike lanes on both sides of Nason Street in the study area. Cottonwood Avenue and Alessandro Boulevard have sidewalks sporadically along both sides of the street. Cottonwood Avenue and Alessandro Boulevard do not have any bike lanes.

PUBLIC TRANSIT

The project site is served by Riverside Transit Agency bus route 20, which provides hourly service six days a week, with Sunday service on Memorial Day, Independence Day, Labor Day, Christmas Day, New Years Day.

Methodology

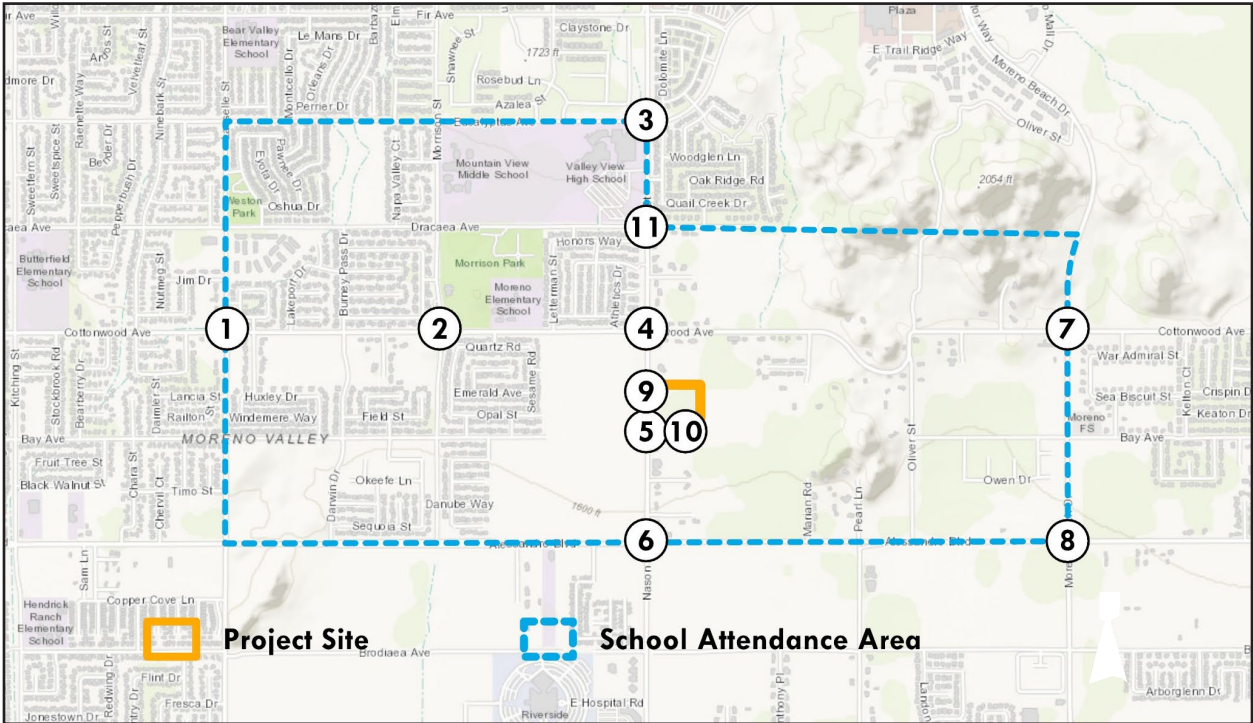
AM and PM peak hour traffic operations are summarized for the following scenarios:

- Existing conditions¹¹¹
- Opening Year without and with Project
- Cumulative without and with Project

Weekday AM and PM peak-hour turn movement volumes were collected on Thursday, May 2, 2019, and Tuesday, June 11, 2019. The counts were taken on typical weekdays when schools were in session (see Appendix G of this Initial Study for the Traffic Impact Analysis, Appendix B, Traffic Counts). The analysis uses a buildout year of 2025 because the City of Moreno Valley requires the opening year analysis to be a minimum of 5 years from the baseline scenario; actual buildout year is Q1-2022.

¹¹¹ See Appendix G, Traffic Impact Analysis, for Existing With Project traffic condition.

Figure 9 - Project Study Area
5. Environmental Analysis



0 1,300
Scale (Feet)



5. Environmental Analysis

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5. Environmental Analysis

LEVELS OF SERVICE

Level of Service (LOS) is a standard performance measurement to describe the operating characteristics of a street system in terms of the level of congestion or delay experienced by motorists. Service levels range from A through F: from the best traffic conditions (uncongested, free-flowing conditions) to the worst (total breakdown with stop-and-go operation). LOS at signalized and unsignalized intersections was calculated using the methodology of the Highway Capacity Manual (HCM), 6th edition. Table 13 describes the LOS concept and the operating conditions expected for signalized and unsignalized intersections.

Table 13 Intersection Level of Service Descriptions

LOS	Description	Average Delay per Vehicle (seconds)	
		Signalized	Unsignalized
A	Level of Service A occurs when progression is extremely favorable and most vehicles arrive during the green phase. Most vehicles do not stop at all. Short cycle lengths may also contribute to low delay.	0 to 10.00	0 to 10.00
B	Level of Service B generally occurs with good progression and/or short cycle lengths. More vehicles stop than for Level of Service A, causing higher levels of average total delay.	10.01 to 20.00	10.01 to 15.00
C	Level of Service C generally results when there is fair progression and/or longer cycle lengths. Individual cycle failures may begin to appear in this level. The number of vehicles stopping is significant at this level, although many still pass through the intersection without stopping.	20.01 to 35.00	15.01 to 25.00
D	Level of Service D generally results in noticeable congestion. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high volume to capacity ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable.	35.01 to 55.00	25.01 to 35.00
E	Level of Service E is considered to be the limit of acceptable delay. These high delay values generally indicate poor progression, long cycle lengths, and high volume to capacity ratios. Individual cycle failures are frequent occurrences.	55.01 to 80.00	35.01 to 50.00
F	Level of Service F is considered to be unacceptable to most drivers. This condition often occurs with oversaturation, i.e., when arrival flow rates exceed the capacity of the intersection. It may also occur at high volume to capacity ratios below 1.00 with many individual cycle failures. Poor progression and long cycle lengths may also be major contributing causes to such delay levels.	80.01 and up	50.01 and up

Source: Highway Capacity Manual, Transportation Research Board, 2000.

ACCEPTABLE LOS AND LEVELS OF SIGNIFICANCE

The City of Moreno Valley prescribes a standard of LOS C for all intersections. However, it also allows peak-hour levels of LOS D in certain locations, including areas of high employment concentration, north-south roads in the vicinity of State Route 60 (SR 60), or other locations in already developed areas of the city with geometric constraints that impede LOS C conditions. Table 14 shows the LOS standard for each study intersection. An impact would occur if the project causes an intersection to deteriorate from acceptable LOS

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(LOS C/D or better) to an unacceptable LOS (LOS D/E or worse) or adds traffic to an intersection already operating at LOS D or worse in the baseline condition.

Table 14 Study Area Level of Service Standards

#	Intersection	Level of Service
1	Lasselle Street/Cottonwood Avenue	C
2	Morrison Street/Cottonwood Avenue	C
3	Nason Street/Eucalyptus Avenue	D
4	Nason Street/Cottonwood Avenue	C
5	Nason Street/Bay Avenue	C
6	Nason Street/Alessandro Boulevard	D
7	Moreno Beach Drive/Cottonwood Avenue	C
8	Moreno Beach Drive/Alessandro Boulevard	D
9	Nason Street/Project Driveway	C
10	Project Driveway/Bay Avenue	C
11	Nason Street/Dracaea Avenue	C

Direct Impact. If an intersection is projected to operate at an acceptable LOS without the project, and the addition of project-related traffic (50 or more peak hour trips) results in the intersection operating at an unacceptable LOS, the impact is considered a potentially significant direct impact. If an intersection is operating at an unacceptable LOS without the project and the project contributes 50 or more peak hour trips, the impact is also considered a potentially significant direct impact. The project would mitigate its direct impacts by reducing delays to pre-project levels or better.

Cumulative Impact. A potentially significant cumulative impact occurs when an intersection is projected to operate below the LOS standards due to local and regional traffic growth (i.e., cumulative development and ambient growth) along with the addition of project traffic. A project's contribution to a cumulatively significant traffic impact can be reduced to less than significant if improvement measures are implemented or fair-share improvement funding is provided to alleviate the impact. If full funding of future cumulative projects is not reasonably ensured, a temporarily unmitigated cumulative impact may occur until the needed improvement is fully funded and constructed.

Environmental Analysis

Would the project:

- a) **Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

Less Than Significant Impact With Mitigation Incorporated.

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Existing Intersection Operations

The existing LOSs were calculated using the HCM methodology. All study intersections operate at a satisfactory LOS during the AM and PM peak hours in existing conditions except for Nason Street / Bay Avenue. Nason Street / Bay Avenue operates at LOS D in the AM peak hours and LOS E in the PM peak hours. The intersection operations analysis results are summarized in Table 15.

Table 15 Existing AM and PM Peak Hour Operation

Intersection	Signal Control	AM Peak		PM Peak	
		Delay in seconds	LOS	Delay in seconds	LOS
1. Lasselle St/Cottonwood Ave	Signal	22.9	C	20.2	C
2. Morrison St/Cottonwood Ave	Signal	25.5	C	24.2	C
3. Nason St/Eucalyptus Ave	Signal	27.9	C	19.7	C
4. Nason St/Cottonwood Ave	Signal	16.7	B	14.0	B
5. Nason St/Bay Ave	TWSC	33.6	D	35.6	E
6. Nason St/Alessandro Blvd.	Signal	29.7	C	23.1	C
7. Moreno Beach Dr./ Cottonwood Ave	Signal	19.6	B	16.1	B
8. Moreno Beach Dr./Alessandro Blvd.	Signal	33.1	C	35.1	D
9. Nason St/Project Driveway (future)	TWSC	-	-	-	-
10. Project Driveway/Bay Ave (future)	TWSC	-	-	-	-
11. Nason St/Dracaea Ave	Signal	19.3	B	10.9	B

Notes: LOS calculation worksheets included in the Traffic Impact Analysis (Appendix G to this Initial Study).

Unacceptable LOS in **Bold Text**

TWSC= Two-Way Stop Control

LOS= Level of Service

Project Trip Generation

Table 16 shows the trip rates and project-related trip generation for the AM peak hour and PM peak hour.

Table 16 Proposed Moreno Elementary Trip Generation Rates

Land Use	Unit	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Elementary School Trip Rates	Student	1.890	0.362	0.308	0.670	0.082	0.088	0.170
Existing Elementary School	483	913	175	149	324	39	43	82
Proposed Project	950	1,796	344	293	637	78	84	162

Source: Trip rates from the Institute of Transportation Engineers, Trip Generation, 10th edition, 2017. Land Use Code 520, Elementary School.

The existing Moreno Elementary School is operating at 26700 Cottonwood Avenue with 483 students. The new school at its long-term maximum capacity of 950 students would generate 1,796 daily trips (637 AM peak hour trips and 162 PM peak hour trips). Although the new school would transfer students from the old school

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and vehicle trips are already on the roadways, it is unclear how the existing trips are distributed; therefore, the traffic study counted all trips as new to ensure all trips were included.

Opening Year Without and With Project Conditions

As shown in Table 17, all study area intersections would operate at an acceptable LOS during peak hours for Future Year Without Project traffic conditions, except for #5, Nason Street / Bay Avenue, which would operate at LOS E during AM and PM peak hours. This intersection would operate at LOS F for the Future Year With Project traffic conditions.

Table 17 Opening Year Without and With Project

Intersection	Opening Year Without Project				Opening Year With Project				Impact?	
	AM Peak		PM Peak		AM Peak		PM Peak		AM	PM
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS		
1. Lasselle St/Cottonwood Ave	23.4	C	20.4	C	24.5	C	20.8	C	No	No
2. Morrison St/Cottonwood Ave	25.8	C	24.2	C	26.8	C	24.3	C	No	No
3. Nason St/Eucalyptus Ave	33.1	C	20.6	C	34.6	C	20.8	C	No	No
4. Nason St/Cottonwood Ave	18.0	B	15.0	B	24.5	C	16.4	B	No	No
5. Nason St/Bay Ave	40.6	E	43.4	E	312.7	F	64.3	F	Yes	Yes
6. Nason St/Alessandro Blvd	31.6	C	23.9	C	32.4	C	24.1	C	No	No
7. Moreno Beach Dr./Cottonwood Ave	21.9	C	17.7	B	26.8	C	18.7	B	No	No
8. Moreno Beach Dr./Alessandro Blvd	36.4	D	38.5	D	38.9	D	38.8	D	No	No
9. Nason St/Project Driveway	-	-	-	-	20.7	C	14.7	B	No	No
10. Project Driveway/Bay Ave	-	-	-	-	8.3	A	7.6	A	No	No
11. Nason St/Dracaena Ave	23.3	C	12.0	B	27.9	C	12.3	B	No	No

Unacceptable LOS in **Bold Text**
LOS= Level of Service

Because the intersection operates at an unsatisfactory LOS in the baseline condition (future without project), this is a significant cumulative impact.

Mitigation Measure T-1 would reduce this impact to less than significant, as shown in Table 18. Nason Street/Bay Ave is projected to operate at LOS A in the AM and PM peak hour with the mitigation.

Table 18 Opening Year Mitigated Intersection

Intersection	Opening Year Without Project				Opening Year With Project				Impact?	
	AM Peak		PM Peak		AM Peak		PM Peak		AM	PM
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS		
5. Nason St/Bay Ave	40.6	E	43.4	E	8.8	A	4.4	A	No	No

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Mitigation Measures

T-1 Nason Street/Bay Avenue. To reduce traffic impacts, MVUSD shall pay for a traffic signal at the Nason Street / Bay Avenue intersection. The District shall ensure that the City of Moreno Valley completes the required improvement prior to Master Plan buildout of the school with 950 students.

Cumulative Without and With Project Conditions

An intersection operations analysis was conducted for the study area to evaluate the cumulative impacts during weekday AM and PM peak-hour conditions. Table 19 provides a comparison between the cumulative without and with project conditions.

Table 19 Cumulative Without and With Project

Intersection	Opening Year Without Project				Opening Year With Project				Impact?	
	AM Peak		PM Peak		AM Peak		PM Peak		AM	PM
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS		
1. Lasselle St/Cottonwood Ave	23.9	C	22.0	C	25.0	C	22.3	C	No	No
2. Morrison St/Cottonwood Ave	25.7	C	24.0	C	27.1	C	24.1	C	No	No
3. Nason St/Eucalyptus Ave	35.7	D	21.8	C	37.8	D	22.0	C	No	No
4. Nason St/Cottonwood Ave	19.8	B	17.1	B	32.9	C	18.2	B	No	No
5. Nason St/Bay Ave	48.8	E	55.5	F	442.3	F	86.1	F	Yes	Yes
6. Nason St/Alessandro Blvd.	32.7	C	27.0	C	33.7	C	27.2	C	No	No
7. Moreno Beach Dr./ Cottonwood Ave	25.8	C	20.8	C	33.4	C	22.0	C	No	No
8. Moreno Beach Dr./Alessandro Blvd.	40.1	D	45.3	D	43.1	D	45.6	D	No	No
9. Nason St/Project Driveway	-	-	-	-	22.9	C	15.9	C	No	No
10. Project Driveway/Bay Ave	-	-	-	-	8.3	A	7.6	A	No	No
11. Nason St/Dracaea Ave	25.3	C	12.2	B	30.5	C	12.9	B	No	No

Unacceptable LOS in **Bold Text**
LOS= Level of Service

One intersection would operate with an unsatisfactory LOS in Cumulative plus Project Conditions—Nason Street/Bay Avenue. Nason Street/Bay Avenue is projected to operate at an unacceptable LOS F in the AM and PM peak hour. Compliance with Mitigation Measure T-1 would reduce traffic impacts at Nason Street/Bay Avenue. As shown in Table 20, with mitigation Nason Street/Bay Avenue would be LOS A in the AM and PM peak hour.

Table 20 Cumulative Mitigated Intersections

Intersection	Opening Year Without Project				Opening Year With Project				Impact?	
	AM Peak		PM Peak		AM Peak		PM Peak		AM	PM
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS		
5. Nason St/Bay Ave	48.8	E	55.5	F	8.8	A	4.1	A	No	No

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Mitigation Measure

Implementation of Mitigation Measure T-1 would reduce traffic impacts at Nason Street/Bay Avenue intersection.

QUEUING ANALYSIS

A queuing analysis for the on-campus drop-off/pick-up area was prepared for the peak 15-minute volume. Additionally a queuing analysis was prepared for each study area intersection comparing the potential queue in the left- and right-turn storage lanes with the available vehicle storage. Three intersections would have a queuing impact as shown in Table 21.

Table 21 Queuing Impacts

Intersection	Queuing Impact	Time
Nason Street/Cottonwood	northbound left-turn	AM peak hour
	eastbound right-turn	AM peak hour
Nason Street/Dracaea Avenue	northbound left-turn	AM peak hour
Nason Street/Bay Avenue	southbound left-turn	AM peak hour

Mitigation Measures

Implementation of Mitigation Measure T-1 would reduce queuing impacts at Nason Street/Bay Ave intersection.

Implementation of Mitigation Measure T-2 and T-3 would reduce queuing impacts.

T-2 Nason Street/Cottonwood Avenue. To reduce the queuing impact at Nason Street/Cottonwood Avenue the District shall pay the full cost to extended the northbound left-turn storage length to about 271 feet and the eastbound right-turn storage length to about 170 feet. The District shall ensure that the City of Moreno Valley completes the required improvement prior to Master Plan buildout of the school with 950 students.

T-3 Nason Street/Dracaea Avenue. To reduce the queuing impact at Nason Street/Dracaea Avenue the District shall pay the full cost to extended the northbound left-turn storage length to about 353 feet. The District shall ensure that the City of Moreno Valley completes the required improvement prior to Master Plan buildout of the school with 950 students.

Transit, Bicycle and Pedestrian Facilities

The proposed project would improve transit access by constructing a 150-foot-long curb cut for a new bus stop (Riverside Transit Agency) in front of the school on Nason Street. Additionally, the project would include a 5-foot-wide sidewalk along the west and south frontages. The project would not impact transit, bicycle, and pedestrian facilities.

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

No Impact. CEQA Guidelines section 15064.3 eliminates auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts:

Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, “vehicle miles traveled” refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided ... (regarding roadway capacity), a project’s effect on automobile delay shall not constitute a significant environmental impact.

Daily vehicle miles traveled (VMT) is an average of the total number of miles traveled by all vehicles each day on principal arterials in Moreno Valley. This is divided by the city’s total population for daily VMT per capita. Data for the figures are reported annually in the Caltrans publication, *California Public Road Data*. The City of Moreno Valley, along with other agencies, has an opt-in period until July 1, 2020, to adopt the guidelines and new VMT-based thresholds. Currently, the City continues to use its established LOS criteria. The MVUSD uses the criteria established by the City; therefore, this analysis relies on currently adopted LOS methodologies and criteria to evaluate transportation impacts. The project would not conflict or be inconsistent with the City of Moreno Valley traffic analysis methodology. Additionally, because the new school location is about 0.5 mile southeast of the existing school, the distance would be similar and the VMT would be similar. No impacts would occur.

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

Less Than Significant Impact. Incompatible uses for a school would include agricultural operations where soil tilling and/or pesticide use creates air pollution, or logistic distribution centers that have large tractors, semitrailer trucks, and oversized equipment constantly traveling the local roadways and creating a hazard to cars or pedestrians. Circulation design that would result in vehicular and/or pedestrian safety hazards would be sharp curves or dangerous intersections.

Construction

During construction, equipment, trucks, and workers would drive to and from the staging area on the project site. Construction trips would be spread throughout the workday and would not occur during peak traffic periods. MVUSD’s construction contractor would prepare a construction worksite traffic control plan prior to commencement of construction. This plan would establish methods to avoid conflicts between the construction traffic and the existing vehicle, pedestrian, and bicycle traffic. MVUSD’s construction BMPs, identified in the construction worksite traffic control plan, would include the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. All proposed truck routes would be approved by the City before beginning construction. Additionally, construction fencing would be used on the project to separate construction zones and to ensure safety. Impacts would be less than significant.

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Operation

School design would include the use of standard engineering practices such as standard driveway widths and turning radii and provision of adequate line of sight to avoid design elements that could result in hazards. “Sight Distance Standards” from the Caltrans Highway Design Manual list minimum sight distance values for a range of design speeds.¹¹² In addition, the school design is required to accommodate ingress and egress of emergency vehicles, as required by MVFD. MVUSD has worked with the Moreno Valley traffic department during site design, and the site plan complies with specifications for provision of adequate access, parking, and circulation in the vicinity of a school site. Impacts would be less than significant.

d) Result in inadequate emergency access?

Less than Significant Impact. The project would not result in inadequate emergency access. The access and circulation would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. All access features are subject to and must satisfy MVFD design requirements. Impacts would be less than significant.

TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:

a) 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

No Impact. Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC § 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.¹¹³

No tribal cultural resources on or within one mile of the site are listed in the National Register of Historic Places,¹¹⁴ California Register of Historical Resources, California State Historical Landmarks, or Points of Historical Interest.¹¹⁵ The project would not impact tribal cultural resources listed on any of the preceding registers of historic resources. No impact would occur.

¹¹² Highway Design Manual, California Transportation Department, May 7, 2012.

¹¹³ California Natural Resources Agency. 2019. AB 52 Regulatory Update. <http://resources.ca.gov/ceqa/>.

¹¹⁴ National Park Service. 2020, February. National Register of Historic Places. <https://npgallery.nps.gov/nrhp>; and <https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466>

¹¹⁵ Officer of Historic Preservation. 2020, February. California Historical Resources. <http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=33>

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- b) **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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Less Than Significant Impact. As part of the AB 52 process, Native American tribes must submit a written request to MVUSD (lead agency) to be notified of projects within their traditionally and culturally affiliated area. MVUSD must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to MVUSD within 30 days of receiving this notification if they want to engage in consultation on the project, and MVUSD must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when either 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

Under subdivision (c) of PRC § 5024.1, the Pechanga Band of Luiseño Indians requested formal notice of proposed projects. The District notified the tribe about the proposed project in a letter dated January 10, 2020, and sent via certified mail and email to Ms. Anna Hoover, Cultural Analyst of the Pechanga Cultural Resources Department. The tribe responded on February 7, 2020, requesting consultation. The District consulted with the tribe in a meeting at the Pechanga office in Temecula on March 12, 2020, at 2:00 pm. Although no significant impacts were identified by the tribe, the District and tribe will work together to provide monitoring during earthwork. Impacts of the proposed project pursuant to criteria in subdivision (c) of PRC § 5024.1 would be less than significant.

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?**

Less Than Significant Impact.

Water Treatment Facilities

Water treatment facilities filter and/or disinfect water before it is delivered to customers. Water provided to the project site includes imported water and local groundwater. Imported water is treated at the Metropolitan Water District of Southern California (MWD) Mills Filtration Plant in Riverside, which has a capacity of 150

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to 220 million gallons per day (mgd),¹¹⁶ and at Eastern Municipal Water District's (EMWD) Perris Water Filtration Plant, with a capacity of 24 mgd.¹¹⁷

The proposed project involves the construction of a new Moreno ES that would serve current and future students living in the region. It would not generate an increase in District student population or water treatment demands in the MWD or EMWD region. Schools do not generate students; they accommodate the demand for education. Students would be attending school in the local area and using water that requires treatment; therefore, the overall demand for water treatment would not increase. The project would not require the relocation or construction of new or expanded water treatment facilities; impacts would be less than significant.

Wastewater Treatment Facilities

Wastewater generated at the project site by the residence is treated at the Moreno Valley Regional Water Reclamation Facility (WRF). The WRF has a capacity of 16 mgd and a daily flow of 10.6 mgd.¹¹⁸

The project would not increase overall District enrollment, and thus would not expand total treatment demands within the District or at the WRF. The project would not require new or expanded wastewater treatment facilities. Impacts would be less than significant.

Stormwater Drainage Facilities

Stormwater from most of the site is absorbed into the ground. The project would create significantly more impervious surfaces, such as pavement and buildings, which do not allow stormwater percolation.

The project would infiltrate, filter, or treat urban runoff from an 85th-percentile storm, that is, approximately a two-year storm, pursuant to requirements of the MS4 Permit. The project would also use other BMPs to reduce runoff specified in the project SWPPP and WQMP. The new school would include an 11,000-square-foot biofiltration detention basin in the southeastern corner of the campus. All stormwater runoff from the hardscape areas would drain into this basin. Stormwater would draw down slowly, and treated water would drain into the existing Line I underground storm drain. Line I Storm Drain starts at Moreno Basin north of SR-60 and runs south along Nason Street. It drains south to Line J, then to Line F, and eventually into Canyon Lake, Lake Elsinore, and the ocean.^{119,120}

¹¹⁶ Metropolitan Water District of Southern California (MWD). 2020, February. Henry J. Mills Treatment Plant. <http://www.mwdh2o.com/AboutYourWater/Water-Quality/henry-j-mills>.

¹¹⁷ Eastern Municipal Water District (EMWD). 2019, February 28. Perris Water Filtration Plant Reject Recovery Facility Settling Channel. . <https://board.emwd.org/Citizens/FileOpen.aspx?Type=4&ID=7303&MeetingID=1679>

¹¹⁸ Eastern Municipal Water District. 2016, October. Moreno Valley Regional Water Reclamation Facility. <https://www.emwd.org/sites/main/files/file-attachments/mvrwrffactsheet.pdf?1537294991>

¹¹⁹ Moreno Valley. 2019. Storm Drain Pollution Prevention, National Pollutant Discharge Elimination System (NPDES): Do You Know Where the Water Goes? Accessed April 25, 2019. http://www.moreno-valley.ca.us/resident_services/waste/stormwater.shtml

¹²⁰ Riverside County. 2015. Riverside County Flood Control and Water Conservation District Master Drainage Plan: Moreno. Updated April 2015. http://rcflood.org/Downloads/Master%20Drainage%20Plans/Updated/Zone%204/Maps/MorenoMDP_map.pdf

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The detention basin would be designed and constructed in compliance with the County of Riverside water quality and flood control regulations. The proposed project would not require the construction of new or expanded off-site stormwater drainage facilities. Impacts would be less than significant.

Electricity and Natural Gas Facilities

Electricity is provided by the Moreno Valley Electric Utility¹²¹ and natural gas by Southern California Gas Company. The proposed project would connect to existing off-site infrastructure. In 2017, the Moreno Valley Electric Utility added 80 megawatts of electrical capacity with the completion of the Kitching Substation, which will provide enough capacity to serve the existing and future demand of its service area.¹²² The project would not increase overall District enrollment and thus would not expand total demands within the District, at the Moreno Valley Electricity Utility, or at the Southern California Gas Company. The project would not require the construction of new or expanded facilities. Impacts would be less than significant.

Telecommunication Facilities

Various private services, including AT&T, Frontier Communications, and Verizon Wireless, currently provide telecommunication services to Moreno Valley. The project would include connections to off-site telecommunication services and facilities in the immediate area. The project would not require the construction of new or expanded telecommunication facilities. Impacts would be less than significant.

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

Less Than Significant Impact. EMWD currently supplies potable water to the project site and surrounding communities.

Water would be used on-site during construction for dust suppression and similar activities. The small amount of water that would be used would not change the existing water entitlements.

The new school would serve current and future students living in the region. It would not generate an increase the student population or student water demands in the EMWD region. Students would be attending school in the local area and using water; therefore, the overall demand for water would not increase.

However, because the site is not currently irrigated, the new school would require an increase in treated water for landscape and turf fields; nevertheless, this increase would be negligible. Additionally, installation of landscape and irrigation is required to adhere to mandatory nonresidential water conservation measures outlined in Division 5.3 of CALGreen, including § 5.304.6 for outdoor potable water use in landscape areas. Therefore, the project would not require a significant increase in water supplies; impacts would be less than significant.

¹²¹ City of Moreno Valley. 2018, August 16. Moreno Valley Electric Utilities Service Area. <http://www.moval.org/mvu/pdfs/MVU-servarea.pdf>

¹²² Moreno Valley Utility. 2019. Fiscal Year 2017-18 Annual Report. <http://www.moval.org/mvu/pubs/MVU-2018-AnnualReport/mobile/index.html#p=7>

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- c) **Result in a determination by the waste water 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?**

Less Than Significant Impact. The new school would continue to serve students currently living in the region and would not generate an increase in the regional student population or the amount of wastewater treatment required. The project would not affect wastewater treatment capacity. 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?**

Less Than Significant Impact. Landfilled solid waste from the City of Moreno Valley is disposed of at Badlands Landfill and El Sobrante Landfill. Badlands Landfill, east of Moreno Valley, has a permitted throughput of 4,800 tons per day (tpd) with a remaining capacity of 15,748,799 cubic yards and an estimated closing date of 2022.¹²³ El Sobrante Landfill, southwest of Lake Mathews, has a permitted throughput of 16,054 tpd with a remaining capacity of 143,977,170 cubic yards and an estimated closing date of 2051.¹²⁴

Demolition of the existing buildings would generate demolition debris. CALGreen § 5.408.1.1 requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Demolition would not adversely impact landfill capacity.

The school would not introduce a new demand to the region but would continue to serve an existing and future student population that already uses these services at school campuses in the District. The project would not increase solid waste generation in the District. Therefore, the project would not adversely impact landfill capacity or impair attainment of solid waste reduction goals. Impacts would be less than significant.

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

No Impact. The District currently complies with federal, state, and local statutes and regulations related to solid waste, and would continue this practice. CALGreen § 5.408 requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operation be recycled and/or salvaged for reuse.

The new school would include storage areas for recyclable materials and would take part in a recycling program. The District would comply with existing regulations. Project development would not conflict with laws governing solid waste disposal. No impact would occur.

¹²³ CalRecycle. 2019. SWIS Facility Detail Badlands Sanitary Landfill (33-AA-0006).
<https://www2.calrecycle.ca.gov/swfacilities/Directory/33-AA-0006/>.

¹²⁴ CalRecycle. 2019. SWIS Facility Detail El Sobrante Landfill (33-AA-0217).
<https://www2.calrecycle.ca.gov/swfacilities/Directory/33-AA-0217/>.

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WILDFIRE

Wildland fire protection in California is the responsibility of the state, local government, or the federal government. The State of California has the primary financial responsibility for the prevention and suppression of wildland fires in State Responsibility Areas (SRA). The SRA cover over 31 million acres, for which the California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services.¹²⁵

Local responsibility areas (LRA) include incorporated cities, cultivated agricultural lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and CAL FIRE under contract to local government. CAL FIRE uses an extension of the SRA fire hazard severity zone model as the basis for evaluating fire hazard in LRAs. The LRA hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. MVFD, which is part of the CAL FIRE/Riverside County Fire Department's regional, integrated, cooperative fire protection organization, currently provides fire protection and emergency medical services to the city of Moreno Valley.

Fire hazard severity zones (FHSZ) are identified as moderate, high, and very high in an SRA and as very high in an LRA.

The nearest FHSZ in the SRA is a high FHSZ about 2.3 miles south, in the hills of the Lake Perris Recreation Area. The nearest very high FHSZ in the LRA is about 0.3 mile northeast of the site, in the hills north of Cottonwood Avenue.¹²⁶ Most of the land between the edge of the very high FHSZ and the project site consists of single-family residential development and vacant former agriculture land. There is no natural pathway or native wildlands susceptible to fire between the FHSZ and the site.

Additionally, the site was analyzed using wildland-urban interface (WUI) as a measure of proximity. WUI is defined as any area for which a community wildfire protection plan is not in effect but is within half mile of the boundary of an "at risk community." An "at risk community" is defined as a community where conditions are conducive to a large-scale wildland fire disturbance event, thereby posing a significant threat to human fire or property.¹²⁷ The proposed project site is classified nonvegetated or agriculture "medium & high housing density" and is not within a WUI or conducive to a large-scale wildland fire. The site is not in or near SRAs or lands classified high FHSZ.

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. Under the Federal Disaster Mitigation Act of 2000, local governments, including counties, cities, and tribes in the United States, are required to prepare a local hazards mitigation plan as a condition of receiving federal disaster mitigation funds. This plan identifies the hazards that have occurred or may occur in the study

¹²⁵ Legislative Analyst's Office. 2005, April 12. A Primer: California's Wildland Fire Protection System. https://lao.ca.gov/2005/fire_protection/051205_fire_protection.htm

¹²⁶ CAL FIRE. Fire Hazard Severity Zones. Accessed January 28, 2020. <https://egis.fire.ca.gov/FHSZ/>

¹²⁷ University of Wisconsin-Madison. 2010. Wildland-Urban Interface (WUI) Change 1990-2010. Assessed February 21, 2019. <http://silvis.forest.wisc.edu/data/wui-change/>

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area and provides mitigation strategies, or action items, designed to save lives and reduce the destruction of property. The emergency response plans and emergency evacuation plans in effect are through the County, the District, and the City.

The emergency response plans in effect are the City of Moreno Valley are the City's Emergency Operations Plan¹²⁸ and MVUSD's Local Hazard Mitigation Plan.¹²⁹

Schools are critical community facilities and are often used as evacuation centers during emergencies. The City implements the City of Moreno Valley Emergency Operations Plan (EOP). The EOP identifies County agencies and other agencies that would be involved in emergency responses; threat summaries and assessments; and procedures for responding agencies as well as County agencies that would be involved in coordinating and managing responses. The EOP is focused on emergencies beyond the scope of the daily functions of public safety agencies, such as emergencies requiring multiagency and/or multi-jurisdictional responses.¹³⁰

The MVUSD Local Hazard Mitigation Plan is designed to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks and reduce or eliminate long-term risk to people and property from natural and man-made hazards. The plan identifies vulnerabilities, provides recommendations for prioritized mitigation actions, evaluates resources, identifies mitigation shortcomings, and provides future mitigation planning and maintenance of the existing plan.¹³¹ MVUSD has established emergency and evacuation plans for every school in the district. No impact would occur.

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?

No Impact. The site is not located in or near state responsibility areas or lands classified as high fire hazard severity. The project would not place people or structures at risk from wildfire or exacerbate wildfire risks. No impact would occur.

¹²⁸ City of Moreno Valley. 2019, September 1. Emergency Operations Plan. http://www.moreno-valley.ca.us/city_hall/departments/fire/pdfs/MV-EOP-2019.pdf.

¹²⁹ Moreno Valley Unified School District (MVUSD) 2017. Local Hazard Mitigation Plan. June 2017. <https://1.cdn.edl.io/24R1PSM47RwYyzYLm3zcSRFqNaQ6dNyeR1Bb5ts2RGlj6mWb.pdf>

¹³⁰ City of Moreno Valley. 2019, September 1. Emergency Operations Plan. http://www.moreno-valley.ca.us/city_hall/departments/fire/pdfs/MV-EOP-2019.pdf.

¹³¹ Moreno Valley Unified School District (MVUSD) 2017. Local Hazard Mitigation Plan. June 2017. <https://1.cdn.edl.io/24R1PSM47RwYyzYLm3zcSRFqNaQ6dNyeR1Bb5ts2RGlj6mWb.pdf>

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- 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?**

No Impact. The site is not located in or near state responsibility areas or lands classified as high fire hazard severity. The site is in a suburban / rural area surrounded by development and vacant land. The project would not require the installation of new infrastructure that may exacerbate fire risk. No impact would occur.

- 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?**

No Impact. The site is surrounded by flat topography. There are no vegetated slopes susceptible to wildfire in the surrounding area. Project would not result in runoff, postfire slope instability, or drainage changes. No impact would occur.

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?**

Less Than Significant with Mitigation Incorporated. The proposed project would neither degrade the quality of the environment nor substantially impact endangered fauna or flora. The project includes demolition of existing buildings and construction of a school and would not significantly change the character of surrounding neighborhoods.

As discussed under Section 5.4, *Biological Resources*, because the surrounding area is primarily suburban residential and vacant former agriculture, the project would not impact the habitat or population level of fish, plant, or animal communities or the range of a rare or endangered plant or animal. The proposed project 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.

As discussed under Section 5.5, *Cultural Resources*, and Section 5.18, *Tribal Cultural Resources*, impacts related to historic and archaeological resources, human remains, and tribal cultural resources would be less than significant. With mitigation, paleontological resources would be less than significant.

- b) **Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?**

Less Than Significant with Mitigation Incorporated. The project would outlast most foreseeable activities, regulations, and existing vacant land uses. However, relative to the natural environment, the project is short term.

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The project's long-term goals include provision of a modern educational facility for students in grades K-5. The District is not proposing a new school to meet short-term goals, but would advance long-term environmental goals to reduce building energy use by providing new facilities that comply with updated CALGreen standards; improve traffic and circulation during peak school times by providing on-campus (off-street) facilities; improve the learning environment for students and staff by providing modern facilities.

The project site currently has a house, garage, barn, small citrus grove, and vacant former agricultural land. Converting existing land uses to an elementary school would not have significant long-term effects on aesthetics, air quality, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services, transportation, tribal cultural resources, and utilities and service systems during construction and operation. Short term mitigation is required for air quality, paleontology, and traffic. Therefore, short-term environmental goals would not be met at the disadvantage of long-term goals. Impacts would be less than significant.

- c) **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 projects, and the effects of probable future projects.)**

Less Than Significant Impact with Mitigation Incorporated. A cumulative impact could occur if the project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. Because the project is a school, the cumulative analysis is generally confined to the immediate vicinity or within about a one-mile radius. The District has several past, present, and planned school projects within the District's boundaries. The conversion of Moreno ES to a Special Education Facility, about 0.5 mile northwest, would not result in significant environmental impacts. The City of Moreno Valley has several projects that would add traffic to the surrounding roadways. In consideration of the preceding analysis, the project's contribution to cumulative traffic impacts would be less than significant with mitigation, and therefore, project impacts would not be cumulatively considerable.

- d) **Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**

Less Than Significant Impact. As discussed in the above analyses, the proposed project would not result in significant direct or indirect adverse impacts or result in substantial adverse effects on human beings. Impacts would be less than significant.

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APPENDICES

- A. Air Quality and Greenhouse Gas Emissions Technical Analysis
- B. Cultural Resource Evaluations
- C. Geological and Environmental Hazards Assessment
- D. Geotechnical Investigation Report
- E. Preliminary Environmental Assessment Report
- F. Noise and Vibration Technical Analysis
- G. Traffic Impact Analysis Report

Appendix

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