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MEMORANDUM

DATE: April 7, 2026

To: Gabriel Diaz, Associate Planner
City of Moreno Valley

FROM: Dionisios Glentis, Senior Environmental Planner

SUBJECT: Addendum to the Initial Study and Mitigated Negative Declaration for Perris and Dracaea Commercial Retail Project (PEN19-0206, PEN19-0207, PEN19-0204, and PEN19-0205) for the Moreno Valley Express Car Wash (PEN22-0193) and Fuel Station with Convenience Store (PEN24-0118) Project

This memorandum prepared pursuant to the California Environmental Quality Act (CEQA) and the regulations of the City of Moreno Valley, is an Addendum to the Initial Study and Mitigated Negative Declaration for Perris and Dracaea Commercial Retail Project (2020 IS/MND) which was certified and approved by the Moreno Valley City Council on December 15, 2020. Per CEQA Section 15164, this Addendum evaluates whether modifications and refinements to the proposed Moreno Valley Express Car Wash and Commercial Development (proposed project) would result in new or substantially more adverse significant effects or require new mitigation measures not identified in the 2020 IS/MND.

INTRODUCTION

This Addendum has been prepared in accordance with the provisions of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §§ 21000 et seq.); the *State CEQA Guidelines* (Title 14, California Code of Regulations [CCR] §§ 15000 et seq.); and the rules, regulations, and procedures for implementing CEQA as set forth by the City of Moreno Valley.

Section 15164(b) of the *State CEQA Guidelines* states that “an addendum to an adopted negative declaration may be prepared only if minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.” Pursuant to Section 15162(a) of the *State CEQA Guidelines*, a subsequent Environmental Impact Report (EIR) or subsequent Negative Declaration is required when:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The 2020 IS/MND evaluated potential environmental impacts anticipated to result from construction and operation of a 3,000 square-foot drive through restaurant with a 400 square-foot outdoor patio and a 4,088-square foot convenience store with a 36-foot by 86-foot (3,096 square-foot) canopy covering 6 multiple product dispensers for fueling up to 12 vehicles (approved project). The City of Moreno Valley (City) is the Lead Agency pursuant to CEQA.

Since adoption of the 2020 IS/MND and approval of the project on December 15, 2020, the project sponsor has submitted an application to the City to replace the previously approved 3,000 square-foot drive-through restaurant and 400 square-foot outdoor patio with a proposed 4,150 square-foot, 2-bay car wash with 120-foot tunnel, which would be developed in the northern half of the project site. The previously approved gas station with convenience store would remain as part of the proposed project, but the following revisions to the gas station with convenience store are proposed (refer to Figure 3: Approved Project Site Plan and Figure 4: Proposed Project Site Plan):

- Four standard parking stalls included as part of the approved project would be converted to electric vehicle charging stalls as part of the proposed project adjacent to the south of the convenience store.
- Minor changes to the proposed lot line adjustment that would separate the proposed gas station from the proposed car wash would not result in any physical changes to the proposed project facilities.
- 36-foot by 86-foot (3,096 square-foot) gas station canopy included as part of the approved project would be converted to an approximately 37-foot by 88-foot (3,255 square-foot) canopy as part of the proposed project to the west of the convenience store.

The proposed updated gas station with convenience store in conjunction with the proposed 4,150 square-foot, 2-bay car wash with 120-foot tunnel would constitute the “proposed project.”

The purpose of this Addendum is to ascertain the extent of potential environmental impacts from the proposed project and determine if new or more severe impacts would result when compared to impacts identified for the approved project in the 2020 IS/MND. The Addendum will provide comparative impact analyses for the following environmental factors presented in Appendix G of the CEQA Guidelines and 2020 IS/MND:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

This Addendum summarizes the proposed changes to the approved project evaluated in the 2020 IS/MND and the reasons for the City’s determination that the proposed changes to the approved project and associated environmental effects do not require further environmental review.

APPROVED PROJECT

The Perris and Dracaea Commercial Retail Project is located on approximately 2 acres comprised of four parcels, Assessor’s Parcel Number (APN) 479-120-027, 029, 042, and 043, at the northeast corner of Perris Boulevard and Dracaea Avenue in the City of Moreno Valley, Riverside County (Refer to Figure 1: Regional and Project Location and Figure 2: Existing Setting). The approved project site is substantially surrounded by commercial and residential uses. The site itself is vacant and contains ruderal vegetation. Four ornamental trees that were documented on the project site during evaluation of the approved project were removed from the site on January 26, 2023. The property has been historically plowed or disked for weed abatement. A residence constructed prior to 1930 was formerly located within the project boundaries but is no longer extant.

The approved project includes development of a 3,000 square-foot drive through restaurant with a 400 square-foot outdoor patio and a 4,088-square foot convenience store with a 36-foot by 86-foot canopy covering 6 multiple product dispensers for fueling up to 12 vehicles (approved project). Figure 3 depicts the approved project site plan.¹

As shown in Figure 3, ingress/egress to the project site is provided from three driveways: one from Perris Boulevard in the center of the site, one from Dracaea Avenue at the southern portion of the site, and one from Atwood Avenue approximately 320 feet north of the site. The internal drive aisle is designed to allow for semi-trucks delivering fuel to the site to enter from Perris Boulevard and exit

¹ All figures are included in Attachment A.

the site to Dracaea Avenue. In addition, the approved project includes several transportation facility improvements along the project frontage as detailed below:

- Remove the existing two-way-left-turn-lane on Perris Boulevard, from south of Pedro's Taco Shop Driveway to Dracaea Avenue;
- Replace the two-way-left-turn-lane with the raised median along the entire project frontage on Perris Boulevard extending north of the intersection of Perris Boulevard/Atwood Avenue up to south of the Pedro's Taco Shop driveway;
- Create left-turn pockets in the raised median for the northbound and southbound movements at the intersection of Perris Boulevard/Atwood Avenue, with storage lengths of 150 feet and 125 feet, respectively;
- Extend the southbound left-turn pocket at the intersection of Perris Boulevard/Dracaea Avenue by 5 feet; and
- Add a bus bay on the east side of Perris Boulevard, north of the intersection of Perris Boulevard/Auto Center Driveway-Project Driveway 1.

Due to the proposed raised median, Auto Center Driveway would operate as a right-in-right-out driveway, and eastbound and westbound left-turn and through movements would be prohibited at the intersection of Perris Boulevard/Atwood Avenue under with-project conditions.²

The approved project also included an amendment to the Moreno Valley General Plan land use designation of the site from Residential/Office to Commercial and a zone change from Office Commercial (OC) District to Community Commercial (CC) District in order to facilitate the development. Pursuant to General Plan Amendment PEN19-0206, Change of Zone PEN19-0207, and Conditional Use Permits PEN19-0204 and PEN19-0205, the 2020 IS/MND was certified and approved by the City of Moreno Valley City Council on December 15, 2020.

PROPOSED PROJECT

The proposed project (PEN22-0193 and PEN24-0118) is located on the same 2.3-acre site as the approved project (refer to Figure 1: Regional and Project Location and Figure 2: Existing Setting) at the northeast corner of Perris Boulevard and Dracaea Avenue in Moreno Valley, Riverside County (APNs 479-120-050 and -051) and is substantially surrounded by commercial and residential uses. The proposed project site is vacant and contains ruderal vegetation. The property has been historically plowed or disked for weed abatement and four ornamental trees that were documented on the project site during evaluation of the approved project were removed from the site on January 26, 2023. A residence constructed prior to 1930 was formerly located within the project boundaries but is no longer extant.

² LSA. *Initial Study and Mitigated Negative Declaration for Perris and Dracaea Commercial Retail*. Pages 4 and 5. December 2020.

The project sponsor proposes to replace the previously approved 3,000 square-foot drive-through restaurant and 400 square-foot outdoor patio with a proposed 4,150 square-foot, 2-bay car wash with a single 120-foot tunnel, which would be developed in the northern half of the project site (refer to Figure 4: Proposed Project Site Plan). Additionally, the proposed project would include vehicle charging infrastructure in southernly parking stalls. The portion of the previously approved project that includes a 4,088-square foot convenience store with a 37-foot by 88-foot canopy (3,255 square foot) covering 6 multiple product dispensers for fueling up to 12 vehicles remains unchanged. Vehicle site access for the proposed car wash is provided via the approved driveway off Perris Boulevard, and all other ingress/egress routes and roadway improvements also remain unchanged from the approved project. Furthermore, construction parameters regarding fleet mix, soil import/export, and schedule for the proposed project are expected to remain unchanged compared to the approved project, except that construction is expected to commence in early 2026.

As stated above, the City Council certified and approved the 2020 IS/MND on December 15, 2020. On June 15, 2021, the City Council approved a comprehensive update of the City's General Plan (2040 General Plan Update), and on August 3, 2021, the City Council adopted Ordinance 981. Together, the 2040 General Plan Update and Ordinance 981 revised the Commercial land use designation and Community Commercial zoning of the project site to Corridor Mixed Use (COMU). However, an environmental group subsequently filed a lawsuit challenging the City's adoption of the 2040 General Plan Update and Ordinance 981. In May 2024, the Riverside County Superior Court ruled in the lawsuit, directing the City to set aside the 2040 General Plan Update, including related changes to the Zoning Ordinance, its CAP, and certification of its EIR. While the City is currently in the process of addressing the items from the court ruling, at this time, the project site has a commercial land use designation and is zoned CC, which are the land use and zoning designations that were designated for the site upon approval of the IS/MND for the approved project.

The primary purpose of the commercial land use designation and CC zoning district are to provide for the general shopping needs of area residents and workers with a variety of business, retail, personal and related or similar services.³ Gasoline stations and car washes are permitted in the CC designation in accordance with Section 9.02.020 (Permitted Uses) of the Moreno Valley Municipal Code.⁴

DETERMINATION OF CONSISTENCY WITH THE FINDINGS OF THE 2020 IS/MND

The following includes an evaluation of the potential environmental effects of the proposed project compared to the impacts identified in the 2020 IS/MND from implementation of the approved project. The scope of the City's review of the proposed project is limited by provisions set forth in CEQA and the State CEQA Guidelines. This review is limited to evaluating the environmental effects associated with the proposed project and comparing those impacts to the impacts associated with the approved project as set forth in the 2020 IS/MND. This Addendum also reviews new information, if any, of substantial importance that was not known and could not have been known with the exercise of reasonable due diligence at the time the 2020 IS/MND was approved. This evaluation also determines whether the changes proposed for the project would result in any new significant impacts.

³ City of Moreno Valley. *Code of Ordinances*. Section 9.04.020(E). Accessed August 8, 2025.

⁴ *Ibid.* Permitted Uses Table 9.02.020-1.

Although State CEQA Guidelines Section 15164 does not stipulate the format or content of an Addendum, the topical areas identified in the 2020 IS/MND are the environmental factors evaluated in this Addendum. This comparative analysis provides the City with the factual basis for determining whether any changes in the proposed project, any changes in circumstances, or any new information since the 2020 IS/MND was approved would require additional environmental review or preparation of a subsequent EIR or [mitigated] negative declaration.

Pursuant to Section 15162 of the *State CEQA Guidelines*, the City has determined, on the basis of substantial evidence in the light of the whole record, that implementation of the proposed project does not propose substantial changes to the approved project, no substantial changes in circumstances would occur which would require major revisions to the 2020 IS/MND, and no new information of substantial importance has been revealed since approval of the 2020 IS/MND that would result in new significant effects.

The Moreno Valley City Council adopted a Mitigation Monitoring and Reporting Program (MMRP), in conjunction with the 2020 IS/MND under Resolution 2020-86, that minimized impacts associated with implementation of the approved project. The previously adopted mitigation measures applicable to the proposed project would be imposed as conditions of the project. The MMRP, as applicable to the proposed project, is provided as Attachment N of this document.

Aesthetics

Section I of the 2020 IS/MND analyzed the visual conditions of the project area and found that less than significant impacts associated with aesthetics would occur with implementation of the approved project. Similar to the approved project, the proposed project would not substantially impact a scenic vista, nor would it substantially damage scenic resources within a State scenic highway. Scenic vistas within the city include Box Springs Mountains and Reche Canyon area to the north, the “Badlands” to the east, and the Mount Russel area to the south. The only scenic vista visible from the project site is the view of the Box Springs Mountains to the north. Although the 2020 IS/MND determined views of the Box Spring Mountains to the north of the project site may be intermittently blocked while traveling along Dracaea Avenue due to the placement of ornamental trees in the landscaped areas north of the street and the proposed new structures on the project site, it would not be considered a substantial adverse effect because the views would only be blocked intermittently. Furthermore, the proposed car wash facility would be similar in height and massing as the approved drive-through restaurant. Therefore, similar to the approved project, impacts on scenic vistas from implementation of the proposed project would be less than significant.

Two locally designated scenic highways are located within the city, including SR-60 approximately 0.75 miles north of the project site and Moreno Beach Drive approximately 3 miles east of the project site. However, neither of these roadways are officially designated State scenic highways. In addition, the 2020 IS/MND indicated that none of the trees previously documented on the project site were considered to be scenic resources. The project site was surveyed on September 8, 2025,⁵ and site

⁵ Kidd Biological, Inc. *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report. Commercial Retail Project at Perris Boulevard/Dracaea Avenue. City of Moreno Valley, Riverside County, California.* Page 9. September 2025. (Attachment C).

conditions were found to be mostly unchanged from conditions previously recorded under the Approved Project,⁶ except four ornamental trees that were documented on the project site during evaluation of the approved project were removed from the site on January 26, 2023. As the proposed project would be located on the same site as the approved project, development of the proposed project would not result in damage to any scenic resources within a State scenic highway.

Similar to the approved project, the construction phase of the proposed project would introduce construction equipment such as excavators, graders, bulldozers, etc., which would temporarily alter the scenic quality of the project site. However, because construction activities would be temporary, scenic quality impacts during construction would be less than significant. Once constructed, the proposed project would include a variety of architectural elements including façade accents and variation in wall planes that serve to avoid a monotonous appearance of the buildings. Furthermore, all buildings on the project site would utilize a combination of colors and materials to establish a mix of textural elements while maintaining visual interest. In addition, landscaping improvements as part of the proposed project would replace the vacant, weedy field with a consistent and integrated plant palette pursuant to Chapter 19.17.030 (Landscape and Water Efficiency Requirements).

Similar to the approved project, implementation of the proposed project would change the visual characteristics of the project site by replacing the existing vacant site with an attractive, well-designed development using varied architectural elements and massing, landscaping, and color combinations that would be designed and constructed per applicable City Municipal Code and General Plan standards. As such, impacts associated with visual character or quality of the project site with implementation of the proposed project would be less than significant.

Similar to the approved project, the proposed project would introduce new sources of light and glare through the development of interior and exterior building lights, landscape lighting, vehicles traveling to and from the project site, and through the use of reflective materials. However, these light sources would not have a significant impact on the night sky, as they would not exceed existing background light levels already present within the surrounding area. In addition, new construction would comply with the City's General Plan and Municipal Code requirements for lighting (Chapter 9.08.100 Lighting). Similar to the approved project, any glare produced by the reflective surfaces of the proposed project would be temporary as the location of the sun would be changing throughout the day. Furthermore, the City's Design Review process includes consideration of material composition and colors to reduce potential for substantial glare from the proposed project structures. Similar to the approved project, impacts associated with new sources of substantial light and glare from the proposed project would be less than significant. ***No new impacts or increase in severity of impacts would occur.***

Agricultural and Forestry Resources

Section II of the 2020 IS/MND analyzed potential impacts to agriculture and forestry resources with implementation of the approved project and found that no impacts would occur. The 2020 IS/MND determined that the approved project would not convert Prime Farmland, Unique Farmland, or

⁶ LSA. *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report. Commercial Retail Project at Perris Boulevard/Dracaea Avenue, City of Moreno Valley, Riverside County, California.* September 2020. (Attachment C).

Farmland of Statewide Importance to non-agricultural use; conflict with existing zoning for agricultural use; conflict with a Williamson Act contract; conflict with existing zoning for forest land, timberland, or timberland zoned Timberland Production; or result in the conversion of forest land to non-forest use.

The 2020 IS/MND indicated that the California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP) designates the project site and surrounding area as “Urban and Built-Up Land.” The project site is currently zoned CC and is not under a Williamson Act contract. In addition, the project site does not contain any forest land or timberland, nor is it zoned for such uses. As the proposed project would be developed on the same site as the approved project, no impacts on agriculture and forestry resources would occur, similar to the approved project. ***No new impacts or increase in severity of impacts would occur.***

Air Quality

Section III of the 2020 IS/MND analyzed potential air quality impacts of the approved project and found that neither construction nor operational emissions would exceed daily South Coast Air Quality Management District (SCAQMD) thresholds, and the approved project would not conflict with or obstruct implementation of the applicable air quality plan, violate air quality standards, result in a cumulatively considerable net increase in any criteria pollutant, or create objectionable odors.

Construction and operational emissions were estimated for both the approved project and proposed project using the latest version of SCAQMD’s California Emissions Estimator Model (CalEEMod), version 2022.1.1, which reflects updates in building code and efficiencies of construction equipment and building design compared to the CalEEMod model used in the 2020 IS/MND. CalEEMod modeling outputs for the approved project and proposed project are included as Attachment B.⁷

Construction parameters regarding fleet mix, soil import/export, and schedule for the proposed project are expected to remain unchanged compared to the approved project, except that construction would commence approximately January 2026. Additionally, criteria air pollutants from mobile emissions were estimated based on vehicle trip generation estimates for the approved 3,000 square-foot drive-through restaurant compared to the proposed 4,150 square-foot, 2-bay car wash with a single 120-foot tunnel using trip generation rates obtained from the Institute of Transportation Engineers Trip Generation Manual (11th Edition), which is the most current edition in circulation. The results indicate the approved 3,000 square-foot drive-through restaurant would have generated

⁷ The CalEEMod analysis evaluated project construction emissions with a start date in January 2024 and end date in July 2024. The proposed project’s construction schedule has since been modified so that project construction would begin approximately January 2026 and would still occur over an approximately 6-month duration. This minimal modification to the project’s construction schedule was reviewed by LSA, and it was determined that the modified schedule would not result in any new or more severe air quality impacts than what are described herein because estimated emissions would be expected to decrease into the future due to technological advances in construction equipment and implementation of increasingly stringent regulatory requirements.

approximately 825 more daily vehicle trips than would the proposed 4,150 square-foot, 2-bay car wash with a single 120-foot tunnel.^{8,9}

As shown in Table A, construction emissions would not exceed daily SCAQMD thresholds for either the approved project or proposed project. Peak daily emissions associated with the proposed project would be the same as the approved project for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}, and approximately 0.6 pounds per day less for VOC. As such, construction of the proposed project would result in less severe air quality impacts when compared to the approved project.

Table A: Short-Term Construction Emissions

Construction Emissions	Total Regional Pollutant Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	Total PM ₁₀	Total PM _{2.5}
Approved Project						
Peak Daily	20.0	30.2	17.5	0.1	6.1	2.8
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No
Proposed Project						
Peak Daily	19.4	30.2	17.5	0.1	6.1	2.8
Net Emissions (Proposed vs Approved Project)	-0.6	0.0	0.0	0.0	0.0	0.0
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

Source: Compiled by LSA (August 2023). Attachment B.

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

SCAQMD = South Coast Air Quality Management District

SO_x = sulfur oxides

VOC = volatile organic compounds

As shown in Table B, operational emissions associated with the proposed project would not exceed daily SCAQMD thresholds for either the approved project or proposed project. Further, peak daily emissions of NO_x, CO, SO_x, PM₁₀, PM_{2.5}, and VOC associated with the proposed project would be less than those for the approved project. As such, operation of the proposed project would result in less severe air quality impacts when compared to the approved project.

Table B: Long-Term Operational Emissions

Construction Phase	Total Regional Pollutant Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	Total PM ₁₀	Total PM _{2.5}
Approved Project						
Mobile Sources	7.6	8.7	73.4	0.2	14.7	3.8
Area Source	0.2	<0.1	0.3	<0.1	<0.1	<0.1
Energy Emissions	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Total Emissions	7.8	8.8	73.8	0.2	14.7	3.8
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No
Proposed Project						

⁸ Urban Crossroads. *City of Moreno Valley Traffic Impact Preparation Guide, June 2020, Exhibit A: Project Scoping Form. Table 2.* May 2, 2022. (Attachment K).

⁹ Refer to Table F in the Transportation Section below.

Table B: Long-Term Operational Emissions

Construction Phase	Total Regional Pollutant Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	Total PM ₁₀	Total PM _{2.5}
Mobile Sources	4.8	5.5	46.5	0.1	9.3	2.4
Area Source	0.3	<0.1	0.4	<0.1	<0.1	<0.1
Energy Emissions	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Total Emissions	5.1	5.6	47.0	0.1	9.3	2.4
Net Emissions (Proposed vs Approved Project)	-2.7	-3.2	-26.8	-0.1	-5.4	-1.4
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

Source: Compiled by LSA (August 2023). Attachment B.

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

SCAQMD = South Coast Air Quality Management District

SO_x = sulfur oxides

VOC = volatile organic compounds

Similar to the approved project, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan, violate air quality standards, result in a cumulatively considerable net increase of any criteria pollutant, or create objectionable odors. Therefore, **no new impacts or increase in the severity of air quality impacts would occur** with implementation of the proposed project.

Biological Resources

Section IV of the 2020 IS/MND analyzed potential impacts on biological resources with implementation of the approved project. The project site lies within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Plan Area; however, the project site is not located within the MSHCP Criteria Area, Public/Quasi-Public Lands, or conservation areas, nor is the site located within the MSHCP Narrow Endemic Plant Species Survey Area, burrowing owl (*Athene cunicularia hypugaea*) survey area, or any other species survey area.¹⁰ The project site was surveyed on September 8, 2025, and site conditions were found to be mostly unchanged from conditions previously recorded under the Approved Project, except four ornamental trees that were documented on the project site during evaluation of the approved project were removed from the site on January 26, 2023 (Attachment C).¹¹

The project site is located within the Stephens’ Kangaroo Rat Habitat Conservation Plan area, and a fee payment will be required prior to issuance of a grading permit. To avoid potential effects to fully protected raptors, special-status bird species, and other nesting birds protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code, and for compliance with MSHCP Incidental Take Permit Condition 5, the 2020 IS/MND prescribed **Mitigation Measure BIO-1** to address potential

¹⁰ LSA. *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report. Commercial Retail Project at Perris Boulevard/Dracaea Avenue, City of Moreno Valley, Riverside County, California.* September 2020. (Attachment C).

¹¹ Kidd Biological. Inc. *Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis and Biology Report. Commercial Retail Project at Perris Boulevard/Dracaea Avenue. City of Moreno Valley, Riverside County, California.* Page 4. September 2025. (Attachment C).

impacts to nesting birds. With adherence to **Mitigation Measure BIO-1**, the 2020 IS/MND determined that impacts on special status species would be reduced to a less than significant level.

The 2020 IS/MND also found that implementation of the approved project would result less than significant impacts on riparian habitats and no impacts on state or federally protected wetlands. In addition, implementation of the approved project would not substantially interfere with wildlife movement, and the approved project would not conflict with any local policies or ordinances protection biological species or with an adopted Habitat Conservation Plan.

Since the proposed project would be developed on the same site as the approved project, implementation of the proposed project would result in similar impacts to biological resources as described in the 2020 IS/MND for the approved project. Accordingly, the proposed project would also be subject to fee payment for the Stephens' Kangaroo Rat Habitat Conservation Plan area and also be required to comply with **Mitigation Measure BIO-1** as described in the 2020 IS/MND, which would ensure impacts to raptors, special-status bird species, and other nesting birds protected by the MBTA and California Fish and Game Code would be reduced to less than significant levels.

As previously discussed, no drainage features, ponded areas, or riparian habitat subject to jurisdiction by the California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and/or the Regional Water Quality Control Board (RWQCB) were found within the project site, and no federally protected wetlands, marshes, vernal pools, or coastal areas were identified within the project area. As such, the 2020 IS/MND determined that no substantial impacts related to these issues would occur. As the proposed project would be developed on the same site as the approved project, implementation of the proposed project would result in similar, less than significant, impacts to riparian habitat and protected wetlands as described in the 2020 IS/MND for the approved project.

The 2020 IS/MND also indicated that the project site is not adjacent to any existing or proposed linkage or core areas as identified in the MSHCP. The project site is surrounded by existing roadways and residential and commercial uses. Because the project site is surrounded by urban development and does not serve as a wildlife movement corridor, the 2020 IS/MND determined that the approved project would not affect wildlife movement. As the proposed project would be developed on the same site as the approved project, implementation of the proposed project would result in similar, less than significant, impacts on wildlife corridors, linkage areas, and the movement of wildlife as described in the 2020 IS/MND for the approved project.

Four trees at least 15 feet tall were documented on the project site during evaluation of the approved project but were removed from the site on January 26, 2023.¹²Pursuant to Part E of Section 9.17.030 of the City Municipal Code, which requires removal of such trees to be replaced at a three to one ratio with minimum twenty-four (24) inch box size trees of the same species or a minimum thirty-six (36) inch box for a one to one replacement, where approved, the project applicant will be conditioned to incorporate multiple trees in the proposed landscape plan to satisfy the requirements of Part E of Section 9.17.030 of the City Municipal Code. Compliance with these standards is required of all

¹² *ibid.*

projects in the City as a matter of regulatory policy (i.e., City Municipal Code) and therefore does not constitute mitigation. Similar to the approved project, the proposed project would be subject to compliance with the requirements set forth by the City Municipal Code. Therefore, the proposed project also would be consistent with all local policies and ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Implementation of **Mitigation Measures BIO-1** requiring a nesting bird pre-construction survey, as identified in the 2020 IS/MND, would remain applicable to the proposed project and would ensure that impacts to biological resources would be reduced to less than significant levels. ***No new impacts or increase in severity of impacts would occur, and no additional mitigation measures are required.***

Cultural Resources

Section V of the 2020 IS/MND analyzed potential impacts to cultural resources with implementation of the approved project and found that less than significant impacts would occur with implementation of **Mitigation Measure TCR-1** through **TCR-6**. The 2020 IS/MND relied on a site-specific Cultural Resources Assessment prepared for the approved project in August 2020 to identify and determine whether any historical or archaeological resources may be present within the project limits.¹³ The Cultural Resources Assessment included a records search conducted on March 28, 2019 at the Eastern Information Center (EIC) at the University of California, Riverside, as well as an intensive pedestrian field survey conducted on April 25, 2019 throughout the project limits. The Cultural Resources Assessment was examined by LSA (Attachment D)¹⁴ in conjunction with the updated biological study, and site conditions were found to be mostly unchanged from conditions previously recorded under the Approved Project. The findings of the site-specific Cultural Resources Assessment prepared for the approved project in August 2020 remain applicable.¹⁵

The 2020 IS/MND indicated that a residence constructed prior to 1930 was formerly located within the project boundaries, and associated features (a utility pole and slab) and a glass bottle fragment dating to the historic period were identified during the survey. The residence was demolished prior to 2002, and only the concrete slab foundation, utility pole, and glass bottle fragment remain. Demolition of the historic-era residence has eliminated the context required to convey any historical significance of the property. The remnant features (utility pole and slab) and glass bottle fragment are typical examples of regionally and locally ubiquitous features and artifacts with no unique character-defining features that could contribute to the significance of the property or to the features and artifacts themselves. Therefore, the 2020 IS/MND determined their removal during construction would not constitute a significant impact. Due to the former presence of a pre-Depression Era residence, the project area retains some potential for associated subsurface resources, including human remains. Therefore, the 2020 IS/MND prescribed archaeological monitoring during ground-disturbing activities. **Mitigation Measures TCR-1** through **TCR- 6**, although prescribed to address

¹³ LSA. *Cultural Resources Assessment, Perris Boulevard and Dracaea Avenue Commercial Retail Project, City of Moreno Valley*. August 2020.

¹⁴ LSA. *Cultural Resources Revalidation Letter for the Addendum to the Initial Study and Mitigated Negative Declaration for Perris and Dracaea Commercial Retail Project (PEN19-0206, PEN19-0207, PEN19-0204, and PEN19-0205) for the Moreno Valley Express Car Wash and Commercial Development Project (PEN22-0193 and PEN24-0118)*. September 11, 2025. (Attachment D).

¹⁵ *Ibid.*

Tribal Cultural Resources, would serve to ensure archaeological and historic-era cultural resources and human remains inadvertently encountered during ground disturbing activities are managed pursuant to CEQA Guidelines Section 15064.5.

As the proposed project would be developed on the same site as the approved project, implementation of the proposed project would result in similar potential impacts to cultural resources as described in the 2020 IS/MND for the approved project. Accordingly, implementation of the proposed project would be subject to **Mitigation Measures TCR-1** through **TCR- 6** as described in the 2020 IS/MND, which would ensure impacts to historical and archaeological resources are reduced to less than significant levels. Furthermore, the proposed project, similar to the approved project, would be subject to compliance with Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the California Public Resources Code to protect human remains in the unlikely event they are encountered. Adherence to State regulations as described above is required for all development and is codified in **Mitigation Measure TCR-6** through the City’s consultation with Native American tribes pursuant to Senate Bill 18 and Assembly Bill 52. Therefore, ***no new impacts or increase in severity of impacts would occur, and no additional mitigation measures are required.***

Energy

Section VI of the 2020 IS/MND analyzed potential energy impacts from implementation of the approved project and found that impacts would be less than significant. The 2020 IS/MND determined that construction and operation of the approved project would not result in the wasteful, inefficient, or unnecessary construction of energy resources and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Energy demand was estimated for both the approved project and proposed project using the latest version of CalEEMod, version 2022.1.1, which reflects updates in building code and efficiencies of building design compared to the CalEEMod model used in the 2020 IS/MND. CalEEMod modeling outputs for the approved project and proposed project are included as Attachment B. Fuel demand was based on vehicle trip generation estimates for the approved 3,000 square-foot drive-through restaurant compared to the proposed 4,150 square-foot, 2-bay car wash with a single 120-foot tunnel using trip generation rates obtained from the Institute of Transportation Engineers Trip Generation Manual (11th Edition), which is the most current edition in circulation. The results indicate the approved 3,000 square-foot drive-through restaurant would have generated approximately 825 more daily vehicle trips than would the proposed 4,150 square-foot, 2-bay car wash with a single 120-foot tunnel.^{16,17}

As shown in Table C, implementation of the proposed project would result in less electricity, natural gas, gasoline fuel, and diesel fuel demand when compared to the approved project.

Table C: Energy Emissions

Approved Project

¹⁶ Urban Crossroads. *City of Moreno Valley Traffic Impact Preparation Guide, June 2020, Exhibit A: Project Scoping Form. Table 2.* May 2, 2022. (Attachment K).

¹⁷ Refer to Table F in the Transportation Section below.

Table C: Energy Emissions

Electricity (kWh/year)	318,146
Natural Gas (therms/year)	410,792
Gasoline Fuel (gallons/year)	132,236
Diesel Fuel (gallons/year)	94,755
Proposed Project	
Electricity (kWh/year)	217,026
Natural Gas (therms/year)	246,860
Gasoline Fuel (gallons/year)	83,752
Diesel Fuel (gallons/year)	60,013
Net Emissions (Proposed vs Approved Project)	
Electricity (kWh/year)	-101,120
Natural Gas (therms/year)	-163,932
Gasoline Fuel (gallons/year)	-48,484
Diesel Fuel (gallons/year)	-34,742

Source: Compiled by LSA (August 2023). Attachment B.
kWh = Kilowatt Hours

As the 2020 IS/MND found that implementation of the approved project would not result in the wasteful, inefficient, or unnecessary demand of energy or conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The proposed project would demand less energy compared to the approved project, so ***no new impacts or increase in severity of impacts would occur.***

Geology and Soils

Section VII of the 2020 IS/MND analyzed potential impacts associated with geology and soils with implementation of the approved project. The 2020 IS/MND found that implementation of the approved project would result in less than significant impacts associated with rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure including liquefaction and landslides; and substantial soil erosion or loss of topsoil. The 2020 IS/MND also indicated that impacts related to expansive soils, on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse would be less than significant with adherence to the specific design recommendations described in a final geotechnical report for the project site. In addition, the 2020 IS/MND indicated that the approved project would connect to existing sewer infrastructure and would not use septic tanks or other alternative wastewater disposal system. Finally, although the 2020 IS/MND determined construction of the approved project would not impact any known paleontological resource or unique geologic feature and the potential to for undiscovered paleontological resources is considered low due to the site history of disturbance, the 2020 IS/MND prescribed **Mitigation Measure GEO-1** and **GEO-2** to ensure that impacts to unanticipated paleontological resources discovered during ground-disturbing activities would remain less than significant.

As the proposed project would be developed on the same site as the approved project, implementation of the proposed project would result in similar impacts associated with rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map; strong seismic ground shaking; seismic-related ground failure including liquefaction and landslides; and substantial soil erosion or loss of topsoil. A Supplemental Geotechnical Evaluation (Attachment

E) was prepared for the proposed project by EEI Engineering Solutions on May 9, 2022¹⁸ in order to confirm, update, and amend the project-specific recommendations presented in the original geotechnical report, dated August 23, 2019,¹⁹ and determined geologic conditions of the site have not differed substantially from those stated in the original geotechnical report. As was the case for the approved project, the project Applicant would be required to prepare a final geotechnical report, which shall include project-specific recommendations and construction specifications that meet or exceed seismic design requirements. The specific design recommendations described in the final geotechnical report would be incorporated into all project-related construction documents. Adherence to the specific design recommendations described in the final geotechnical report would ensure that impacts related to expansive soils, on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse would be less than significant, similar to the approved project. In addition, similar to the approved project, the proposed project would connect to existing sewer infrastructure and would not use septic tanks or other alternative wastewater disposal system.

As the proposed project would be developed on the same site as the approved project, implementation of the proposed project would result in similar potential impacts associated with the discovery of previously unknown paleontological resources. The proposed project therefore would be required to comply with **Mitigation Measures GEO-1** and **GEO-2** as described in the 2020 IS/MND for the approved project, which would require the construction manager and any contractors to attend a Paleontological Resources Worker Sensitivity Training prior to ground disturbance and ensure a paleontologist monitors ground disturbing activities. Implementation of **Mitigation Measures GEO-1** and **GEO-2** would ensure that impacts to paleontological resources would be reduced to less than significant levels. ***No new impacts or increase in severity of impacts would occur and no additional mitigation measures are required.***

Greenhouse Gas Emissions

Section VIII of the 2020 IS/MND analyzed potential impacts related to greenhouse gas (GHG) emissions with implementation of the approved project and found that impacts would be less than significant. The 2020 IS/MND determined that construction and operation of the approved project would not generate significant GHG emissions and would not conflict with any applicable plans, policies or regulations adopted for the purpose of reducing the emission of GHGs.

Construction and operational GHG emissions were estimated for both the approved project and proposed project using the latest version of CalEEMod, version 2022.1.1, which reflects updates in building code and efficiencies of construction equipment and building design compared to the CalEEMod model used in the 2020 IS/MND. CalEEMod modeling outputs for the approved project and proposed project are included as Attachment B.

Construction parameters regarding fleet mix, soil import/export, and schedule for the proposed project are expected to remain unchanged compared to the approved project, except that

¹⁸ EEI Engineering Solutions. *Supplemental Geotechnical Consulting, Proposed Retail Development. 25064 Dracaea Avenue. Moreno Valley, California. EEI Project AAA-73034.7.* May 9, 2022. (Attachment E).

¹⁹ EEI Engineering Solutions. *Geotechnical Evaluation, Proposed Retail Development. 25064 Dracaea Avenue. Moreno Valley, California. EEI Project CAD-73034.4.* August 23, 2019.

construction would commence approximately January 2026.²⁰ Additionally, GHG emissions from mobile sources were estimated based on vehicle trip generation estimates for the approved 3,000 square-foot drive-through restaurant compared to the proposed 4,150 square-foot, 2-bay car wash with a single 120-foot tunnel using trip generation rates obtained from the Institute of Transportation Engineers Trip Generation Manual (11th Edition), which is the most current edition in circulation. The results indicate the approved 3,000 square-foot drive-through restaurant would have generated approximately 825 more daily vehicle trips than would the proposed 4,150 square-foot, 2-bay car wash with a single 120-foot tunnel.^{21,22}

As shown in Table D, construction of the proposed project would generate approximately the same amount of GHG emissions as the approved project when amortized 30 years over the expected life of the project.

Table D: Construction GHG Emissions (Metric Tons Per Year)

Construction Year	Total CO ₂ e
Approved Project	
2024	119.9
Amortized Construction Emissions	4.0
Proposed Project	
2024	120.2
Amortized Construction Emissions	4.0

Source: Compiled by LSA (August 2023)

CH₄ = methane

CO₂ = carbon dioxide

CO₂e = carbon dioxide equivalent

MT/yr = metric tons per year

N₂O = nitrous oxide

SCAQMD = South Coast Air Quality Management District

In addition, as shown in Table E, operational GHG emissions associated with the proposed project would be approximately 577.5 metric tons less per year as compared to the approved project. Similar to the approved project, implementation of the proposed project would not exceed any SCAQMD thresholds for GHG emissions.

Table E: Operational GHG Emissions (Metric Tons Per Year)

Emission Source	Operational Emissions			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Approved Project				
Mobile Sources	1,437.1	0.1	0.1	1,464.9
Area Source	0.1	<0.1	<0.1	0.1

²⁰ The CalEEMod analysis evaluated project construction emissions with a start date in January 2024 and end date in July 2024. The proposed project’s construction schedule has since been modified so that project construction would begin approximately January 2026 and would still occur over an approximately 6-month duration. This minimal modification to the project’s construction schedule was reviewed by LSA, and it was determined that the modified schedule would not result in any new or more severe GHG impacts than what are described herein because estimated emissions would be expected to decrease into the future due to technological advances in construction equipment and implementation of increasingly stringent regulatory requirements.

²¹ Urban Crossroads. *City of Moreno Valley Traffic Impact Preparation Guide, June 2020, Exhibit A: Project Scoping Form.* Table 2. May 2, 2022. (Attachment K).

²² Refer to Table F in the Transportation Section below.

Table E: Operational GHG Emissions (Metric Tons Per Year)

Emission Source	Operational Emissions			
	CO ₂	CH ₄	N ₂ O	CO ₂ e
Energy Emissions	98.6	<0.1	<0.1	98.9
Water Emissions	2.0	<0.1	<0.1	3.1
Waste Emissions	3.5	0.4	0.0	12.3
Total Approved Project Emissions				1,579.3
Amortized Construction Emissions				4.0
Total Emissions				1,583.3
SCAQMD Thresholds				3,000
Exceeds Thresholds?				No
Proposed Project				
Mobile Sources	910.2	0.1	<0.1	927.8
Area Source	0.2	<0.1	<0.1	0.2
Energy Emissions	65.5	<0.1	<0.1	65.7
Water Emissions	1.0	<0.1	<0.1	1.6
Waste Emissions	1.9	0.2	0.0	6.5
Total Proposed Project Emissions				1,001.8
Amortized Construction Emissions				4.0
Total Emissions				1,005.8
Net Emission (Proposed – Approved Project)				-577.5
SCAQMD Thresholds				3,000
Exceeds Thresholds?				No

Source: Compiled by LSA (August 2023). Attachment B.

CH₄ = methane

CO₂ = carbon dioxide

CO₂e = carbon dioxide equivalent

MT/yr = metric tons per year

N₂O = nitrous oxide

SCAQMD = South Coast Air Quality Management District

The 2020 IS/MND determined that implementation of the approved project would not generate significant GHG emissions and would not conflict with any applicable plans, policies or regulations adopted for the purpose of reducing the emission of GHGs. As detailed in Tables D and E, implementation of the proposed project would result in fewer GHG emissions compared to the approved project, and potential impacts related to GHG emissions therefore would be less than significant. Additionally, the proposed project is consistent with the City’s commercial land use designation and CC zoning designation, and growth projections of the City and would be constructed in accordance with the latest Title 24 provisions of the CalGreen Code and the City’s Energy Efficiency and Climate Action Strategy, similar to the approved project. ***No new impacts or increase in severity of impacts would occur.***

Hazards and Hazardous Materials

Section IX of the 2020 IS/MND analyzed potential impacts associated with hazards and hazardous materials with implementation of the approved project. The 2020 IS/MND found that implementation of the approved project would result in less than significant impacts associated with the routine transport, use, or disposal of hazardous materials and reasonably foreseeable upset and accent conditions involving the release of hazardous materials into the environment. The 2020 IS/MND also found that the approved project would not emit hazardous emissions or handle hazardous materials within 0.25-mile of a school; result in a safety hazard or excessive noise due to proximity to a public or public use airport; impair implementation of or physically interfere with an adopted emergency

response or evacuation plan; or be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5.

Similar to the approved project, the transport, use, and storage of hazardous materials during construction and operation of the proposed project would be conducted pursuant to all applicable local, state and federal laws, and in cooperation with the Riverside County Fire Department, Riverside County Department of Environmental Health, Hazardous Materials Division (DEH), Environmental Protection and Oversight Division, and California Occupational Safety and Health Administration. Additionally, the United States Department of Transportation Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials by truck and rail on State highways and rail lines, as described in Title 49 of the Code of Federal Regulations and implemented by Title 13 of the California Code of Regulations. Similar to the approved project, the proposed project would also be required to implement health and safety policies and procedures regarding hazardous materials used where employees would be expected to handle or work around hazardous materials. Pursuant to the Federal Hazard Communication Standard (29 CFR 1910.1200) and the Laboratory Standard (29 CFR 1910.1450), Safety Data Sheets (SDS) outlining procedures to address spills and leaks for individual chemicals would be used to conduct chemical safety training for all employees who work with chemicals in order to minimize the occurrence of accidental chemical releases and ensure that, when one does occur, it is handled in a safe manner. These regulations inherently safeguard life and property from the hazards of fire/explosion arising from the storage, handling, and use of hazardous substances, materials, and devices, as well as hazardous conditions due to the use or occupancy of buildings. Through compliance with all applicable federal, state, and local laws, impacts to the public or environment from the routine transportation, use and disposal of hazardous materials during construction and operation of the proposed project would be less than significant, as previously determined for the approved project in the 2020 IS/MND.

The 2020 IS/MND also determined that with compliance with applicable regulations, as described above, the approved project would not result in significant impacts related to the release of hazardous materials, as the project site has no history of agricultural use or manufacture or disposal of hazardous materials. Since approval of the 2020 IS/MND, a *Phase I Environmental Site Assessment (ESA)* (Attachment F) was prepared for the project site by Krazan and Associates, Inc, in July 2021.²³ The Phase I ESA found no evidence of a recognized environmental condition (REC), controlled REC, or historical REC associated with the project site. In addition, both the 2020 IS/MND and the Phase I ESA concluded that the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5. As the proposed project would be developed on the same site as the approved project, implementation of the proposed project would result in similar impacts associated with the potential release of hazardous materials and would not be located on a site included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5.

²³ Krazan & Associates, Inc. *Phase I Environmental Site Assessment, Proposed Commercial Property, Southeast of Atwood Avenue and Perris Boulevard, APNs 479-120-027, -029, -042, and -043, Moreno Valley, California*. July 7, 2021. (Attachment F).

The nearest school to the project site is the Riverside County Education Academy located at 1370 Perris Boulevard approximately 0.45 mile south of the project site. Because the project site is not within 0.25 miles of a school, the 2020 IS/MND determined no impacts associated with the handling of hazardous waste in proximity of a school would occur. The project site is also not located within an airport influence zone of the March Air Reserve Base, which is located approximately 2.75 miles southwest of the project site. As the proposed project would be developed on the same site as the approved project, implementation of the proposed project also would result in no impact related to the handling of hazardous materials in proximity to a school and no impact related to safety hazards or excessive noise due to proximity to an airport.

Similar to the approved project, construction of the proposed project that could temporarily restrict vehicular traffic would incorporate appropriate measures to facilitate the passage of persons and vehicles through/around any temporary road closures in accordance with the California Fire Code. During construction, standard traffic control devices such as warning signs, warning lights, and flaggers will be utilized as applicable to minimize obstructions and ensure the safe passage of emergency vehicles as necessary for the purposes of coordinating efforts during local, State, and/or federal emergency events, including response to hazardous materials incidents. The approved project included three driveways (one each from Perris Boulevard, Dracaea Avenue, and Atwood Avenue). Vehicle site access for the proposed car wash is provided via the approved driveway off Perris Boulevard, and all other proposed ingress/egress routes and roadway improvements also remain unchanged from the approved project. As detailed in Attachment G, a site-specific drive-through queuing analysis was conducted for the proposed car wash, which determined the storage space of the proposed car wash drive-through lanes would provide adequate storage capacity for vehicles to prevent spill-over onto Perris Boulevard.²⁴

Similar to the approved project, the proposed project does not include gates, thereby facilitating immediate fire department access to the site in the event of an emergency, and the project site layout includes provisions for emergency vehicle access, which would be reviewed for adequacy by the Moreno Valley/Riverside County Fire Department. In addition, fire department emergency vehicle apparatus access road locations and design shall be in accordance with the California Fire Code, Riverside County Ordinance No. 787, and Moreno Valley/Riverside County Fire Department Standards to ensure proper roadway turning radii, fire lane widths, etc. As such, impacts related to emergency access or interference of an adopted emergency response or evacuation plan would be similar to the approved project and less than significant.

The 2020 IS/MND indicated that no portion of the project site and the surrounding area is identified as being within either a moderate, high, or very high fire hazard severity zone, as mapped by the California Department of Forestry and Fire Protection, and implementation of the approved project would not expose people or property to new increased wildland fire risks. As the proposed project would be developed on the same site as the approved project, implementation of the proposed

²⁴ Urban Crossroads. *Moreno Valley Express Car Wash Drive-Thru Evaluation*. August 26, 2022, Updated October 30, 2025. (Attachment G).

project also would result in no impact related to new increased wildland fire risks. ***No new impacts or increase in severity of impacts would occur.***

Hydrology and Water Quality

Section X of the 2020 IS/MND analyzed potential impacts associated with hydrology and water quality with implementation of the approved project. The 2020 IS/MND found that with implementation of **Mitigation Measures HYD-1** through **HYD-3**, the approved project would not violate any water quality standards or waste discharge requirements; substantially decrease groundwater supplies or interfere with groundwater recharge; result in substantial offsite erosion or siltation; or result in on or off-site flooding; impede or redirect flood flows with implementation of mitigation. The 2020 IS/MND also found that the approved project would not result in risk of release of pollutants due to project inundation or conflict with a water quality control plan or sustainable groundwater management plan.

Similar to the approved project, construction of the proposed project could result in soil erosion and discharge of pollutants into drainages. To reduce impacts to less than significant levels, the 2020 IS/MND prescribed **Mitigation Measures HYD-1** requiring the project comply with the provision of the Construction General Permit Order No. 2009-0009-DWQ as required by the Santa Ana Regional Water Quality Control Board; **Mitigation Measures HYD-2** requiring preparation of a Storm Water Pollution Prevention Plan (SWPPP) pursuant to the provisions of the Riverside County Flood Control and Water Conservation District National Pollutant Discharge Elimination System (NPDES) Permit Order No. R8-2013-0024, NPDES No. CAS 618033; and **Mitigation Measure HYD-3**, requiring the submittal of a Final Water Quality Management Plan (Final WQMP) to the City for review and approval to ensure operation of the project complies with the NPDES Permit.

Similar to the approved project, the proposed project also would be subject to **Mitigation Measures HYD-1** through **HYD-3** as described in the 2020 IS/MND, which would ensure impacts relating to the violation of any water quality standards or waste discharge requirements would be reduced to less than significant levels.²⁵ Implementation of **Mitigation Measures HYD-1** through **HYD-3** would also ensure the proposed project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan, similar to the approved project.

The 2020 IS/MND indicated that new developments, including the approved project, would be supplied with imported water from one of the following sources: (1) treated imported water from MWD; (2) untreated imported water from MWD, which is subsequently treated by EMWD; or (3) untreated imported water treated by EMWD and recharged into groundwater basins for later withdrawal. The 2020 IS/MND determined the approved project would not deplete groundwater supplies or interfere with groundwater recharge. Since the project site would not be served via groundwater, and with implementation of **Mitigation Measure HYD-3**, implementation of the proposed project would not preclude or obstruct on-site infiltration of storm water into the local groundwater aquifer. As the proposed project would also be considered new development on the

²⁵ The latest Construction General Permit (Order No. 2022-0057-DWQ) went into effect September 1, 2023 and would be implemented in accordance with **Mitigation Measure HYD-1**.

project site and would implement **Mitigation Measure HYD-3**, impacts associated with groundwater supply and recharge would be similar to the approved project and less than significant.

Similar to the approved project, implementation of the proposed project would alter the amount of existing impervious surface area and the amount of generated runoff and would construct structures and impervious surfaces that could potentially alter the current drainage pattern of the site and vicinity. Pursuant to the requirements of the NPDES permit, excess flows and sediment would be captured by best management practices (BMPs) identified in the SWPPP (**Mitigation Measure HYD-2**) to address water quality impacts associated with construction operations. Construction BMPs would include, but not be limited to, erosion control and sediment control BMPs designed to minimize erosion and retain sediment on site and good housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. The SWPPP would be developed, and construction BMPs selected and implemented, to target pollutants of concern during construction. The construction BMPs would be designed to retain sediment and other pollutants on site so they would not reach receiving waters or degrade beneficial uses. Additionally, BMPs for source control, pollution prevention, site design, low impact development (LID) implementation, and structural treatment control during project operation shall be designed and implemented to address 303(d) listed pollutants and retain the project site's minimum design capture volume and hydromodification volume to ensure post-development storm water runoff volume or time of concentration does not exceed pre-development storm water runoff in accordance with the Santa Ana Regional Water Quality Control Board Order Number R8-2010-0033, National Pollutant Discharge Elimination System (NPDES) Permit No. CAS618033, as amended by Order No. R8-2013-0024, also known as the Municipal Separate Storm Sewer System (MS4) permit, as identified in the WQMP (**Mitigation Measure HYD-3**).

A Hydrology Report (Attachment H)²⁶ and project-specific WQMP (Attachment I)²⁷ for the proposed project were prepared by Kimley-Horn and Associates in July 2021 and August 15, 2025, respectively. The Hydrology Report concluded that development of the project site is not expected to cause a significant impact to downstream systems for storms up to the 100-year condition. Additionally, the project specific WQMP included onsite Modular Wetlands BMPs sized to accommodate design flows and provide treatment of stormwater prior to discharge into the proposed underground detention systems and existing storm drain infrastructure along Perris Boulevard. These Modular Wetland systems, along with other permanent operational BMPs, would be designed to retain the minimum design capture volume and hydromodification volume and ensure that post-development runoff and water quality comply with the City's MS4 permit, without exceeding pre-development conditions by more than 10 percent of the two-year peak flow. As the proposed project would also be required to comply with **Mitigation Measures HYD-2** and **HYD-3** as described in the 2020 IS/MND, impacts associated with on- or off-site flooding, impeding flood flows, or the exceedance of the stormwater

²⁶ Kimley-Horn and Associates. *Final Hydrology Report, Moreno Valley Plaza, APN: 479-120-023, 474-120-042, 479-120-027, and 479-120-043*. July 25, 2021. (Attachment H).

²⁷ Kimley-Horn and Associates. *Project-Specific Water Quality Management Plan, Moreno Valley Plaza, PEN22-0193*. August 15, 2025. (Attachment I).

drainage system capacity for the proposed project would be the same as for the approved project, less than significant with mitigation incorporated.

Then 2020 IS/MND determined that the project site is not located within a 100-year flood hazard area and would not expose people or structures to a risk of loss, injury, or death involving the failure of a levee or dam. The project site was also determined to not be in a tsunami or seiche zone. As the proposed project would be developed on the same site as the approved project, implementation of the proposed project would result in similar, less than significant, impacts associated with the release of pollutants due to project inundation.

Implementation of **Mitigation Measures HYD-1** through **HYD-3** requiring compliance with the Construction General Permit, preparation of SWPPP, and submittal of a Final WQMP would remain applicable to the proposed project and would ensure that all impacts associated with hydrology and water quality would be reduced to less than significant levels. ***No new impacts or increase in severity of impacts would occur, and no additional mitigation measures are required.***

Land Use

Section XI of the 2020 IS/MND analyzed potential impacts associated with land use and planning with implementation of the approved project. The project site is located in an urbanized area of the city, surrounded by residential and commercial land uses. The 2020 IS/MND found that because the project site is vacant and the approved project would not introduce features such as highways or transit lines, implementation of the approved project would not divide an established community. As the proposed project would be developed on the same site as the approved project, impacts associated with dividing an established community would be similar to the approved project, less than significant.

The approved project included an amendment to the Moreno Valley General Plan land use designation of the site from Residential/Office to Commercial and a zone change from Office Commercial (OC) District to Community Commercial (CC) District in order to facilitate the development. Pursuant to General Plan Amendment PEN19-0206, Change of Zone PEN19-0207, and Conditional Use Permits PEN19-0204 and PEN19-0205, the 2020 IS/MND was certified and approved by the City of Moreno Valley City Council on December 15, 2020. On June 15, 2021, the City Council approved a comprehensive update of the City's General Plan (2040 General Plan Update), and on August 3, 2021, the City Council adopted Ordinance 981. Together, the 2040 General Plan Update and Ordinance 981 revised the commercial land use designation and CC zoning of the project site to COMU. However, an environmental group subsequently filed a lawsuit challenging the City's adoption of the 2040 General Plan Update and Ordinance 981. In May 2024, the Riverside County Superior Court ruled in the lawsuit, directing the City to set aside the 2040 General Plan Update, including related changes to the Zoning Ordinance, its CAP, and certification of its EIR. While the City is currently in the process of addressing the items from the court ruling, at this time, the project site has a commercial land use designation and is zoned CC, which are the land use and zoning designations that were designated for the site upon approval of the IS/MND for the approved project.

The primary purpose of the commercial land use designation and CC zoning district are to provide for the general shopping needs of area residents and workers with a variety of business, retail, personal

and related or similar services.²⁸ Gasoline stations and car washes are permitted in the CC designation in accordance with Section 9.02.020 (Permitted Uses) of the Moreno Valley Municipal Code.²⁹ Therefore, implementation of the proposed project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts of the proposed project would be similar to the approved project, less than significant. **No new impacts or increase in severity of impacts would occur.**

Mineral Resources

Section XII of the 2020 IS/MND analyzed potential impacts on mineral resources with implementation of the approved project and found that because no regionally or statewide significant mineral resources are located within the city and no significant mineral resources exist within or near the project site, no impacts would occur. As the proposed project would be developed on the same site as the approved project, implementation of the proposed project would also result in no impact on mineral resources. **No new impacts or increase in severity of impacts would occur.**

Noise

Section XIII of the 2020 IS/MND analyzed potential noise impacts with implementation of the approved project. The 2020 IS/MND found that long term operational noise impacts associated with the approved project would be less than significant. However, mitigation would be required to reduce potential impacts from short-term construction noise and vibration. Implementation of **Mitigation Measure NOI-1** would ensure construction activities would occur during specified daytime hours, during which the city considers construction noise exempt from noise limit thresholds. **Mitigation Measure NOI-1** also would exempt any vibration that could be felt off-site during construction; however, the 2020 IS/MND determined that there is potential for damage to buildings because the use of large bulldozers on the project site would have the potential to exceed the Federal Transit Administration's (FTA's) building damage thresholds at the north and southeast borders of the site. As such, the 2020 IS/MND prescribed **Mitigation Measure NOI-2** to prohibit large bulldozers from operating within 15 feet of the residential structures immediately north and southeast of the project site and ensure vibration levels would not exceed the FTA's damage threshold of 94 velocity decibels (VdB) (0.2 peak particle velocity (PPV) [in/sec]) for buildings constructed of non-engineered timber and masonry. The 2020 IS/MND also found that vibration generated from operation of the approved project, including project related traffic on the adjacent paved roadways, would be less than significant. In addition, the 2020 IS/MND determined that no impact would occur relating to the exposure of people residing or working in the area to excessive noise levels due to proximity to an airport as the project site is located outside of the 60-dBA community noise equivalent level (CNEL) noise contour of the nearest airport (March Air Reserve Base).

Since the proposed project is located on the same site as the approved project, construction noise and vibration could be potentially significant. As such, the proposed project would be required to implement **Mitigation Measures NOI-1** and **NOI-2** as detailed in the 2020 IS/MND to ensure construction activities would occur during specified daytime hours, during which the city considers construction noise exempt from noise limit thresholds. **Mitigation Measure NOI-1** also would exempt

²⁸ City of Moreno Valley. *Code of Ordinances*. Section 9.04.020(E). Accessed August 8, 2025.

²⁹ *Ibid.* Permitted Uses Table 9.02.020-1.

any vibration that could be felt off-site during construction, and **Mitigation Measure NOI-2** would prohibit large bulldozers from operating within 15 feet of the residential structures immediately north and southeast of the project site and ensure vibration levels would not exceed the FTA's damage threshold of 94 velocity decibels (VdB) (0.2 peak particle velocity (PPV) [in/sec]) for buildings constructed of non-engineered timber and masonry. Similar to the approved project, implementation of **Mitigation Measures NOI-1** and **NOI-2** would reduce construction noise and vibration impacts of the proposed project to less than significant levels.

A Noise Impact Analysis (Attachment J) for the proposed car wash, including the roof-top air conditioning units, parking lot vehicle movements, trash enclosure activity, car wash vacuums, and car wash tunnel activities, was prepared by Urban Crossroads in January 2023, which assumed the proposed car wash could operate 24 hours per day as a worst case scenario.³⁰ The analysis concluded that operational noise levels associated with the proposed car wash would remain below the City's 60 dBA equivalent continuous sound level (Leq) daytime and 55 dBA Leq nighttime exterior noise level standards at all nearby receiver locations, and the car wash would generate a daytime and nighttime operational noise level increase ranging from less than 0.1 to 3.1 dBA Leq at the nearby receiver locations, which is below the City's adopted thresholds regarding increases in ambient noise.³¹ Additionally, the 2020 IS/MND concluded that operation of the approved service station and convenience store likewise would not exceed the City's daytime or nighttime exterior noise level standards at all nearby receiver locations and also would not exceed adopted thresholds regarding increases in ambient noise. Therefore, operation of the proposed project would not generate noise levels in excess of standards established in the local general plan or noise ordinance.

Since the proposed project would be located on the same site as the approved project, the proposed project would also result in no impact relating to the exposure of people residing or working in the area to excessive noise levels due to proximity to an airport.

Implementation of **Mitigation Measures NOI-1** and **NOI-2** as identified in the 2020 IS/MND would remain applicable to the proposed project and would ensure that potential construction noise impacts would be reduced to less than significant levels. ***No new impacts or increase in severity of impacts would occur and no additional mitigation measures are required.***

Population and Housing

Section XIV of the 2020 IS/MND analyzed potential impacts on population and housing with implementation of the approved project. The 2020 IS/MND indicated that the approved project was expected to generate up to 39 employees, 27 of which would be required to operate the restaurant and up to 12 for the convenience store/service station. Employees are expected to come from the surrounding area. The 2020 IS/MND determined that amending the land use designation to commercial would not substantially alter the housing and employment forecast in the city. Additionally, the approved project does not include a residential component, which would otherwise

³⁰ Urban Crossroads. *Moreno Valley Express Car Wash, Noise Impact Analysis*. January 24, 2023. (Attachment J).

³¹ *Ibid.* Pages 20, 34, and 35.

generate a permanent increase in population. Finally, streets, utilities, and municipal services such as police and fire services currently exist in the project area to serve the site.

Implementation of the proposed project is expected to generate approximately 16 employees, of which 4 would be employed by the proposed car wash³² and up to 12 for the approved convenience store/service station. Similar to the approved project, employees are expected to come from the surrounding area. As the proposed project would be developed on the same site as the approved project on a site zoned CC that permits car washes and service stations, implementation of the proposed project would not substantially alter the housing and employment forecast in the city. Additionally, similar to the approved project, the proposed project could be served by existing streets, utilities, and municipal services.

The 2020 IS/MND concluded that because the project site does not contain any residences that would be removed due to the development of the approved project, implementation of the approved project would not displace a substantial number of people or housing and would not require the construction of replacement housing elsewhere. As the proposed project would be developed on the same site as the approved project, implementation of the proposed project likewise would result in no impact associated with the displacement of people or housing. As such, implementation of the proposed project would result in similar impacts associated with population and housing as the approved project. ***No new impacts or increase in severity of impacts would occur.***

Public Services

Section XV of the 2020 IS/MND analyzed potential impacts on public services with implementation of the approved project. The 2020 IS/MND determined that development of the approved project would not result in any significant impacts on fire or police protection services, schools, parks, or other public facilities.

As previously stated, the project site is not located within an identified Fire Hazard Severity Zone. Although the approved project would introduce new structures to a vacant site, the 2020 IS/MND indicated that the project site is located in an area that is already served by existing fire protection services (Riverside County Fire Station 2). Furthermore, the approved project would be required to adhere to City standards requiring the Applicant to provide evidence of an on-site fire hydrant system to the Fire Chief to ensure adequate fire flow for use by the Riverside County Fire Department in the event of an on-site fire and comply with applicable California Building Code and Fire Code standards, including the provision for fire sprinklers, ignition-resistant design and materials, and emergency access. Implementation of the proposed project would also introduce new structures to a vacant site; however, as the proposed project would be developed on the same site as the approved project and would be required to adhere to the same review and regulation requirements, implementation of the proposed project would also result in a less than significant impact related to fire protection services and would not necessitate new fire protection facilities.

³² IBISWorld. *Car Wash & Auto Detailing in the US – Employment Statistics 2004-2029*. <https://www.ibisworld.com/industry-statistics/employment/car-wash-auto-detailing-united-states/#:~:text=The%20average%20Car%20Wash%20%26%20Auto,in%20the%20US%20adding%20employees%3F>. Accessed September 4, 2023.

The 2020 IS/MND indicated that the project site is in an area already served by police protection services, and development of new commercial uses at the project site would incrementally increase the need for police services in the area. However, the incorporation of Crime Prevention Through Environmental Design (CPTED) features as part of the approved project would keep service demand increases to a minimum. Additionally, the project site would be equipped with formal surveillance through the use of closed-circuit television, electronic monitoring, and potentially security patrols, as well as informal surveillance such as architecture, landscaping, and lighting designed to minimize visual obstacles and eliminate places of concealment for potential assailants. Because the approved project would be designed and operated per applicable standards required by the City for new development with regard to public safety and would be required to pay development impact fees (DIFs) used to fund capital costs associated with constructing new public safety structures and purchasing equipment for new public safety structures, the 2020 IS/MND determined that impacts to police protection services would be less than significant. Similar to the approved project, the proposed project would include CPTED features, formal surveillance, and would pay required DIFs. Payment of DIFs commensurate with the increased demand for services in the city would offset any increase in demand for police services. As such, impacts on police protection services with implementation of the proposed project would be less than significant, similar to the approved project.

The 2020 IS/MND determined that the project Applicant would be required to pay DIFs in accordance with Government Code 65995 and Education Code 17620 even though the approved project does not include a residential component and would not generate school aged students. With payment of applicable DIFs, the approved project was determined to have no impact on schools. Similar to the approved project, the proposed project does not include a residential component and also would be required to pay applicable DIFs. As such, implementation of the proposed project would result in no impacts on schools, similar to the approved project.

The 2020 IS/MND also determined that demand on existing park facilities and other public facilities such as libraries and hospital services is expected to be minimal since there is no direct increase in population anticipated from the approved project. As the proposed project also would not result in a direct increase in population, impacts on parks and other public facilities are expected to be similar to the approved project, less than significant. ***No new impacts or increase in severity of impacts would occur.***

Recreation

Section XVI of the 2020 IS/MND analyzed potential impacts on public services with implementation of the approved project. The 2020 IS/MND determined that because the approved project is not expected to contribute to a direct population increase and future employees are expected to come from the surrounding area, implementation of the approved project would not substantially increase demand on existing neighborhood or regional parks or on other recreation facilities so as to increase to accelerate their physical deterioration. Similar to the approved project, the proposed project is not expected to contribute to a direct population increase, and future employees are expected to come from the surrounding area. Furthermore, the proposed project is expected to generate fewer employees (16 employees) compared to the approved project (39 employees). As such, impacts on recreation would be similar to the approved project, less than significant. ***No new impacts or increase in severity of impacts would occur.***

Transportation

Section XVII of the 2020 IS/MND analyzed potential impacts on transportation with implementation of the approved project. The 2020 IS/MND found that the approved project would be consistent with CEQA Guidelines Section 15064.3(b) and would not increase hazards due to geometric design feature or incompatible uses at the project site. The 2020 IS/MND also determined that the approved project would not conflict with a program, plan, ordinance, or policy addressing the circulation system with implementation of **Mitigation Measure TRA-1**, which requires payment of fair share fees, as identified in Table 17.B of the 2020 IS/MND, for improvements at Perris Boulevard/Eucalyptus Avenue and Perris Boulevard/Cottonwood Avenue under project completion (2022) conditions and at Perris Boulevard/Eucalyptus Avenue and Perris Boulevard/Dracaea Avenue under General Plan build-out (2040) conditions.

The 2020 IS/MND indicated that the approved project would generate 324 net A.M. peak hour trips, 204 net P.M. peak hour trips, and 3,471 net daily trips, of which the drive through restaurant portion of the approved project would contribute 267 A.M. peak hour trips, 130 P.M. peak hour trips, and 2,461 daily vehicle trips. The Moreno Valley Express Car Wash (PPA22-0005) Traffic Analysis Scoping Agreement (Attachment K) was prepared for the proposed project by Urban Crossroads in May 2022 and details the anticipated vehicle trip generation for proposed car wash.³³ The car wash would result in nominal A.M. peak hour trips, 78 P.M. peak hour trips, and 776 daily trips. As shown in Table F, the approved 3,000 square-foot drive-through restaurant would have generated approximately 825 more daily vehicle trips than would the proposed 4,150 square-foot, 2-bay car wash with a single 120-foot tunnel.

Table F: Trip Generation Comparison

Land Use	Quantity	Units	A.M. Peak Hour			P.M. Peak Hour			Daily Trips
			In	Out	Total	In	Out	Total	
Proposed Car Wash ¹	1	Tunnel	0	0	0	39	39	78	776
Approved Drive-Through Restaurant ²	3,000	Square feet	131	126	257	58	58	116	1,601
Net New Trip Generation (Proposed Car Wash minus Approved Drive-Through Restaurant)	-	-	-131	-126	-257	-19	-19	-38	-825

¹ Urban Crossroads. *City of Moreno Valley Traffic Impact Preparation Guide, June 2020, Exhibit A: Project Scoping Form*. Table 2. May 2, 2022. (Attachment K). The car wash is not expected to operate during the A.M. peak hours of 7 A.M. to 9 A.M.

² Rates from the ITE Trip Generation Manual (11th Edition), Land Use 937 - "Coffee/Donut Shop with Drive-Through Window", Setting/Location - "General Urban/Suburban."

As shown in Table F, the proposed project would result in fewer vehicle trips to and from the project site during peak hours and throughout the day as compared to the approved project, resulting in reduced level of service effects on the surrounding circulation system. Nevertheless, vehicle trips associated with the proposed car wash combined with the anticipated number of vehicle trips

³³ Urban Crossroads. *City of Moreno Valley Traffic Impact Preparation Guide, June 2020, Exhibit A: Project Scoping Form*. Table 2. May 2, 2022. (Attachment K).

associated with the approved service station and convenience store could potentially result in unsatisfactory level of service on the surrounding circulation system. As such, the proposed project would implement **Mitigation Measure TRA-1**, as prescribed for the approved project and detailed in the 2020 IS/MND, requiring payment of fair share development fees for improvements at Perris Boulevard/Eucalyptus Avenue and Perris Boulevard/Cottonwood Avenue under project completion (2022) conditions and at Perris Boulevard/Eucalyptus Avenue and Perris Boulevard/Dracaea Avenue under General Plan build out (2040) conditions. The proposed project also would implement the transportation facility improvements along the frontage of the proposed project site, as listed in the description of the approved project, above. Through payment of fair share development fees as prescribed in **Mitigation Measure TRA-1** and implementation of the transportation facility improvements, the proposed project would maintain acceptable level of service standards outlined in the City's General Plan and Transportation Impact Analysis Guidelines. Therefore, the proposed project would result in similar impacts on transit, pedestrian, and bicycle projects and policies as identified in the 2020 IS/MND for the approved project, and the proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system, similar to the approved project.

Pursuant to the City's Vehicle Miles Traveled (VMT) analysis guidelines, retail land uses less than 50,000 square feet which tend to serve the local community and therefore have the potential to reduce VMT are screened out from further VMT assessment. As the approved project would be significantly smaller than 50,000 square feet and develop commercial retail uses at the project site that would primarily serve the immediate vicinity, the 2020 IS/MND determined the approved project would have a less than significant impact on VMT. Similar to the approved project, the proposed project would be significantly smaller than 50,000 square feet and develop commercial retail uses at the project site that would preliminarily serve the immediate vicinity. As such, the Moreno Valley Express Car Wash Vehicle Miles Traveled (VMT) Screening Evaluation (VMT Screening Evaluation) (Attachment L) prepared for the proposed project by Urban Crossroads in May 2022 determined that the VMT impact is presumed to be less than significant, and no further VMT analysis is required.³⁴ As such, similar to the approved project, the proposed project would be consistent with CEQA Guidelines Section 15064.3(b).

Similar to the approved project, roadway improvements in and around the project site would be designed and constructed to satisfy all City requirements for street widths, corner radii, intersection control as well as incorporate design standards tailored specifically to site access requirements. In addition, entrances and exits to and from parking and loading facilities would be marked with appropriate directional signage. Similar to the approved project, and in accordance with the California Fire Code, the proposed project would be designed and constructed, and structures, roadways, and facilities would be maintained, to ensure appropriate emergency/evacuation access to and from the project site.

Similar to the approved project, the relocated bus stop would include a dedicated turnout for busses to pull off the roadway for safer service to the public and tanker-truck fuel delivery to the service

³⁴ Urban Crossroads. *Moreno Valley Express Car Wash Vehicle Miles Traveled (VMT) Screening Evaluation*. May 18, 2022. (Attachment L).

station would occur during the off-peak hours, so there would be no circulation issues for fuel tanker trucks. The trucks would have adequate turning radii to ingress using the project driveway on Perris Boulevard and egress using the project driveway on Dracaea Avenue. Additionally, adequate space is available on site for fuel tanker trucks to park during fuel discharge operations. In addition, according to the Moreno Valley Express Car Wash Drive-Thru Evaluation (Attachment G) prepared by Urban Crossroads in August 2022, the car wash would be able to support peak queuing within the drive-thru, and peak queuing can be supported on-site without spilling onto Perris Boulevard.³⁵ Similar to the approved project, the City, at final plan check, would ensure that all improvements associated with the proposed project would be consistent with City standards and requirements. Adherence to applicable City requirements would ensure the proposed development would not include any sharp curves or dangerous intersections and that adequate emergency access is maintained. As such, the proposed project would result in less than significant impacts related to these issues, similar to the approved project.

Implementation of **Mitigation Measure TRA-1** requiring payment of fair share for intersection improvements as identified in the 2020 IS/MND would remain applicable to the proposed project and would ensure that impacts associated with transportation would be reduced to less than significant levels. ***No new impacts or increase in severity of impacts would occur and no additional mitigation measures are required.***

Tribal Cultural Resources

Section XVIII of the 2020 IS/MND analyzed potential impacts on tribal cultural resources with implementation of the approved project and found that less than significant impacts to tribal cultural resources would occur with implementation of **Mitigation Measures TCR-1** through **TCR-6**. During preparation of the 2020 IS/MND, the city began consultation efforts pursuant to Senate Bill (SB) 18 and Assembly Bill (AB) 52. The 2020 IS/MND indicated that three tribes, the Pechanga Band of Luiseño Indians (Pechanga), the Soboba Band of Luiseño Indians (Soboba), and the Rincon Band of Luiseño Indians (Rincon), requested formal consultation with the City, while the Agua Caliente Band of Cahuilla Indians (Aqua Caliente) requested additional information on the project prior to determining if consultation is necessary. Two additional tribes, the Morongo Band of Mission Indians (Morongo) and the San Manuel Band of Mission Indians (San Manuel), informed the city they do not wish to consult on the approved project. Five entities representing three tribes, the Cahuilla Band of Indians, the Los Coyotes Band of Cahuilla Mission Indians, the Desert Cahuilla Indians/Torres Martinez, the Santa Rosa Band of Mission Indians, and the Serrano Nation of Mission Indians did not respond to the City.

All of the tribal correspondences pursuant to SB 18 and AB 52 occurred in October and November of 2019, and the city subsequently prescribed **Mitigation Measures TCR-1** through **TCR-6** for the protection of tribal cultural resources. As the proposed project would be developed on the same site as the approved project, implementation of the proposed project would result in similar potential impacts to tribal cultural resources as described in the 2020 IS/MND. The proposed project would therefore be required to implement **Mitigation Measures TCR-1** through **TCR-6** as described in the 2020 IS/MND, which would ensure impacts would be reduced to less than significant levels. ***No new***

³⁵ Urban Crossroads. *Moreno Valley Express Car Wash Drive-Thru Evaluation*. August 26, 2022, Updated October 30, 2025. (Attachment G).

impacts or increase in severity of impacts would occur and no additional mitigation measures are required.

Utilities and Service Systems

Section XIX of the 2020 IS/MND analyzed potential impacts on utilities and service systems with implementation of the approved project and found that less than significant impacts would occur. Similar to the approved project, the proposed project would connect to existing utilities, including water, drainage, electric power, natural gas, and telecommunications located beneath Perris Boulevard and Dracaea Avenue. Similar to the approved project, all project-related drainage features would be required to meet City and RWQCB standards. On-site project-related drainage features would be designed, installed, and maintained per City standards and the requirements identified in the Final WQMP (per **Mitigation Measure HYD-3**). In addition, the proposed project would be required to comply with City standards requiring adequate septic or sewer service capacity be available in a timely manner prior to approval of any development application and that each project include the infrastructure needed to support the project at the time it is needed. There would be no significant environmental effects specifically related to the installation of utility interconnections that are not encompassed within the approved project's or proposed project's construction and operational footprint, and therefore already identified, disclosed, and subject to all applicable mitigation measures, as well as local, State, and federal regulations, as part of the 2020 IS/MND. Therefore, impacts related to relocation of utilities would be similar to the approved project, less than significant.

The 2020 IS/MND indicated that the project site would be served by the Eastern Municipal Water District (EMWD). New developments, including the approved and proposed project, will be supplied with imported water from one of the following sources: (1) treated imported water from Metropolitan Water District of Southern California (MWD); (2) untreated imported water from MWD, which is subsequently treated by EMWD; or (3) untreated imported water treated by EMWD and recharged into groundwater basins for later withdrawal. As indicated in the 2020 IS/MND, the MWD's 2015 Urban Water Management Plan (UWMP) concludes that the MWD is able to meet projected demands for all member agencies through 2040, even during dry periods. EMWD's 2015 UWMP also discloses that in the event of a water supply shortage or water emergency, the City has in place water shortage contingency plans, which ensure provision of priority water services to all its existing and anticipated customers.

The proposed project would replace the previously approved 3,000 square-foot drive-through restaurant and 400 square-foot outdoor patio with a proposed 4,150 square-foot, 2-bay car wash with a single 120-foot tunnel, which would be developed in the northern half of the project site. The car wash is expected to serve 776 cars per day and would be served by a PurClean Reclaim System.³⁶ The primary purpose of the PurClean Reclaim System is to provide quality water to the car wash so that the water can be re-used within the car wash, which allows the operator to minimize the amount of incoming fresh water to the car wash and the amount that is discharged. According to the Water Usage Information memorandum prepared for the proposed project by PurClean in August 2023 (Attachment M), the car wash would use approximately 86.11 gallons of water per vehicle, consisting

³⁶ Purclean. *Moreno Valley Express Wash, MacNeil Tunnel, Water Usage Information*. August 17, 2023. (Attachment M).

of approximately 32.77 gallons of fresh water and approximately 53.34 gallons of water that would be recycled by the PurClean Reclaim System. Approximately 6 gallons of water would be lost per vehicle due to evaporation and carry off. Overall, the car wash would use approximately 25,430 gallons of fresh water per day and discharge approximately 20,774 gallons of water the sewer system per day (26.77 gallons per vehicle).³⁷

EMWDs 2020 UWMP indicates that the EMWD uses local and imported water to supply potable and non-potable water within its jurisdictional boundary.³⁸ EMWD produces potable groundwater from two management plan areas within the San Jacinto Groundwater Basin, including the West San Jacinto Groundwater Basin Management Plan area and the Hemet/San Jacinto Groundwater Management Plan area.

On March 28, 2022, the California Governor issued Executive Order N-7-22, which encourages all Californians and water agencies to restrict water usage and recommends urban water suppliers to implement Stage 2 of its Water Shortage Contingency Plan. The EMWD is currently in Stage 1: Supply Watch of its Water Shortage Contingency Plan, which asks for a voluntary 10 percent reduction in water use.³⁹ Under extreme conditions, water supplies could be allocated using MWD's Water Supply Allocation Plan to preserve supplies in storage by requiring a reduction in demand by member agencies, including the EMWD, pursuant to SB 1168 and 1319, and AB 1739. Commercial customers face event-driven penalties and could face fines if found violating water use restrictions. In the event of a water supply shortage or water emergency, the City may implement more urgent stages of its Water Shortage Contingency Plan to ensure provision of priority water services to all its existing and anticipated customers.

The EMWD imports approximately half of its water supply from the Metropolitan Water District, which projects it would have adequate supply to meet demand of all of its member agencies through the year 2045 under Average Year, Single-Dry Year, and Multiple-Dry Year conditions.⁴⁰ Through a combination of locally-sourced groundwater in conjunction with imported water from the Metropolitan Water District, the EMWD anticipates to have sufficient water supplies to meet demand through the year 2045 under Average Year, Single-Dry Year, and Multiple-Dry Year conditions.⁴¹ The EMWD models each scenario based on the land use and zoning designations of each local jurisdiction it serves.

As stated above, the City Council approved the 2020 IS/MND on December 15, 2020, which designated the project site as Community Commercial. On June 15, 2021, the City Council approved a comprehensive update of the City's General Plan (2040 General Plan Update), and on August 3, 2021, the City Council adopted Ordinance 981. Together, the 2040 General Plan Update and Ordinance 981 revised the commercial land use designation and CC zoning of the project site to COMU. However, an environmental group subsequently filed a lawsuit challenging the City's adoption of the 2040 General

³⁷ 32.77 gallons of fresh water per vehicle - 6 gallons of evaporation and carry off = 26.77 gallons per vehicle.

³⁸ Eastern Municipal Water District. *2020 Urban Water Management Plan*. Page E-2. July 1, 2021.

³⁹ Eastern Municipal Water District. *Our Services*. Water Supply Status. <https://www.emwd.org/water-supply-status> (Accessed September 6, 2023).

⁴⁰ Eastern Municipal Water District. *2020 Urban Water Management Plan*. Page 7-2. July 1, 2021.

⁴¹ *Ibid.* Page 7-7, Page 7-8, and Page 7-9.

Plan Update and Ordinance 981. In May 2024, the Riverside County Superior Court ruled in the lawsuit, directing the City to set aside the 2040 General Plan Update, including related changes to the Zoning Ordinance, its CAP, and certification of its EIR. While the City is currently in the process of addressing the items from the court ruling, at this time, the project site has a commercial land use designation and is zoned CC, which are the land use and zoning designations that were designated for the site upon approval of the IS/MND for the approved project.

The primary purpose of the commercial land use designation and CC zoning district are to provide for the general shopping needs of area residents and workers with a variety of business, retail, personal and related or similar services.⁴² Gasoline stations and car washes are permitted in the CC designation in accordance with Section 9.02.020 (Permitted Uses) of the Moreno Valley Municipal Code.⁴³ Therefore, the proposed project is already accounted for in the water (groundwater) supply and demand scenarios determined by EMWD. Furthermore, the EMWD does not currently identify “threats to its groundwater supply that cannot be mitigated by treatment or blending, and EMWD does not anticipate a significant loss of supply due to water quality issues.”⁴⁴ Similar to the approved project, sufficient water supplies would be available to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant.

Wastewater services in the city are provided by the EMWD, and wastewater generated at the project site would be treated at the Moreno Valley Regional Water Reclamation Facility (MVRWRF). The 2020 IS/MND indicates that the EMWD currently treats approximately 43 million gallons per day of wastewater at its five active regional water reclamation facilities through 1,813 miles of sewer pipelines. The typical daily flow at the MVRWRF is 10.6 million gallons per day with a current capacity of 16 million gallons per day, having a current excess capacity of approximately 5.4 million gallons per day. The car wash would manage effluent per municipal regulations in accordance with the business license that would be granted by the City, including discharging effluent into the sewer system. According to the Water Usage Information memorandum (Attachment M), the car wash would discharge approximately 20,774 gallons of water the sewer system per day (26.77 gallons per vehicle).⁴⁵ This represents less than 0.2 percent of the daily flow at the MVRWRF and approximately 0.4 percent of the excess capacity, which would be more than adequate to serve the proposed project in addition to existing entitlements. Impacts would be similar to the approved project, less than significant.

Solid waste collection is a “demand-responsive” service, and current service levels can be expanded and funded through user fees. Solid waste generated from the project site would be sent to the Riverside County Waste Management Department’s (RCWMD) Badlands Landfill located at 31125 Ironwood Avenue approximately 5-miles northeast of the project site. The Badlands Sanitary Landfill has a maximum daily permitted throughput of 4,800 tons per day and remaining capacity of 15,748,799 cubic yards.⁴⁶ The 2020 IS/MND indicated the approved project is anticipated to generate

⁴² City of Moreno Valley. *Code of Ordinances*. Section 9.04.020(E). Accessed August 8, 2025.

⁴³ *Ibid.* Permitted Uses Table 9.02.020-1.

⁴⁴ Eastern Municipal Water District. *2020 Urban Water Management Plan*. Page 7-4. July 1, 2021.

⁴⁵ Purclean. *Moreno Valley Express Wash, MacNeil Tunnel, Water Usage Information*. August 17, 2023. (Attachment M).

⁴⁶ CalRecycle. *Facility/Site Summary Details: Badlands Sanitary Landfill*. 2020.

approximately 495.8 pounds of solid waste per day (90.48 tons/year), which represents approximately 0.005 percent of the current permitted throughput at the Badlands Sanitary Landfill. The proposed project would replace the drive-through restaurant with a car wash. Based on a solid waste generation of 0.9 pound per 100 square feet of service station,⁴⁷ the proposed project is anticipated to generate approximately 74.15 pounds of solid waste per day (13.5 tons/year).⁴⁸ As the proposed project would generate less solid waste than the approved project, impacts related to solid waste disposal would be less than significant, similar to the approved project.

Similar to the approved project, the proposed project would be required to comply with applicable elements of AB 341; AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991); CalRecycle regulations; and other applicable local, State, and federal solid waste disposal standards, including City Municipal Code Section 8.80.040 (On-site practices), thereby ensuring that the solid waste stream to the Badlands Sanitary Landfill is reduced in accordance with existing regulations. Compliance with regulations related to solid waste disposal and diversion is required for all projects within the City as a matter of regulatory policy. Therefore, similar to the approved project, the proposed project would not conflict with statutes and regulations related to solid waste ***No new impacts or increase in severity of impacts would occur.***

Wildfire

Section XVIII of the 2020 IS/MND analyzed potential impacts associated with wildlife with implementation of the approved project and found that no impacts would occur. The 2020 IS/MND indicated that the project site is not located within any State Responsibility Area (SRA) for fire service and is not within a Very High Fire Hazard Severity Zone (VHFHSZ). The project site is generally flat and is bound by existing development on all sides. In addition, the approved project would not impair the implementation of, or physically interfere with, and adopted emergency response plan. Therefore, the 2020 IS/MND determined that the approved project would not exacerbate wildfire risks, expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, or impair an adopted emergency response or evacuation plan. As the proposed project would be developed on the same site as the approved project, implementation of the proposed project likewise would not result in wildfire impacts. ***No new impacts or increase in severity of impacts would occur.***

CONCLUSION

On the basis of the evaluation presented above, the proposed project, if implemented, would not trigger any of the conditions requiring preparation of a subsequent or supplemental IS/MND, as the proposed project is consistent with the 2020 IS/MND. The change in use at the project site from drive through restaurant to car wash would not introduce new significant environmental effects, substantially increase the severity of previously identified significant environmental effects, or demonstrate that mitigation measures or alternatives previously found not to be feasible would in fact be feasible. The changes that would be implemented as part of the proposed project would not

⁴⁷ CalRecycle. *Estimated Solid Waste Generation Rates*. <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates#Industrial>. (Accessed September 6, 2023).

⁴⁸ 0.9 pounds of solid waste × (4,088 square feet ÷ 100) = 36.8 pounds per day for the gas station and convenience store.
0.9 pounds of solid waste × (4,150 square feet ÷ 100) = 37.35 pounds per day for the car wash. (36.8 + 37.35 = 74.15 pounds per day of solid waste).

alter the findings in the 2020 IS/MND. In addition, no change has occurred with respect to the circumstances surrounding the project that would cause new or substantially more severe significant environmental effects than identified in the 2020 IS/MND, and no new information has become available that shows that the project would cause significant environmental effects not already analyzed in the 2020 IS/MND. Therefore, no further environmental review is required beyond this consistency analysis with the 2020 IS/MND.

Attachments: A: Figures
B: CalEEMod Results for Proposed Project and Approved Project
C: MSHCP Consistency Analysis and Biology Report Update
D: Cultural Resources Assessment Revalidation
E: Supplemental Geotechnical Evaluation
F: Phase I Environmental Site Assessment
G: Moreno Valley Express Car Wash Drive-Thru Evaluation
H: Final Hydrology Report
I: Project Specific Water Quality Management Plan
J : Noise Impact Analysis
K: Traffic Scoping Form
L: Vehicle Miles Traveled Screening Evaluation
M: Car Wash Water Usage Information
N: Approved Project Mitigation Monitoring and Reporting Program

**ATTACHMENT A
FIGURES**

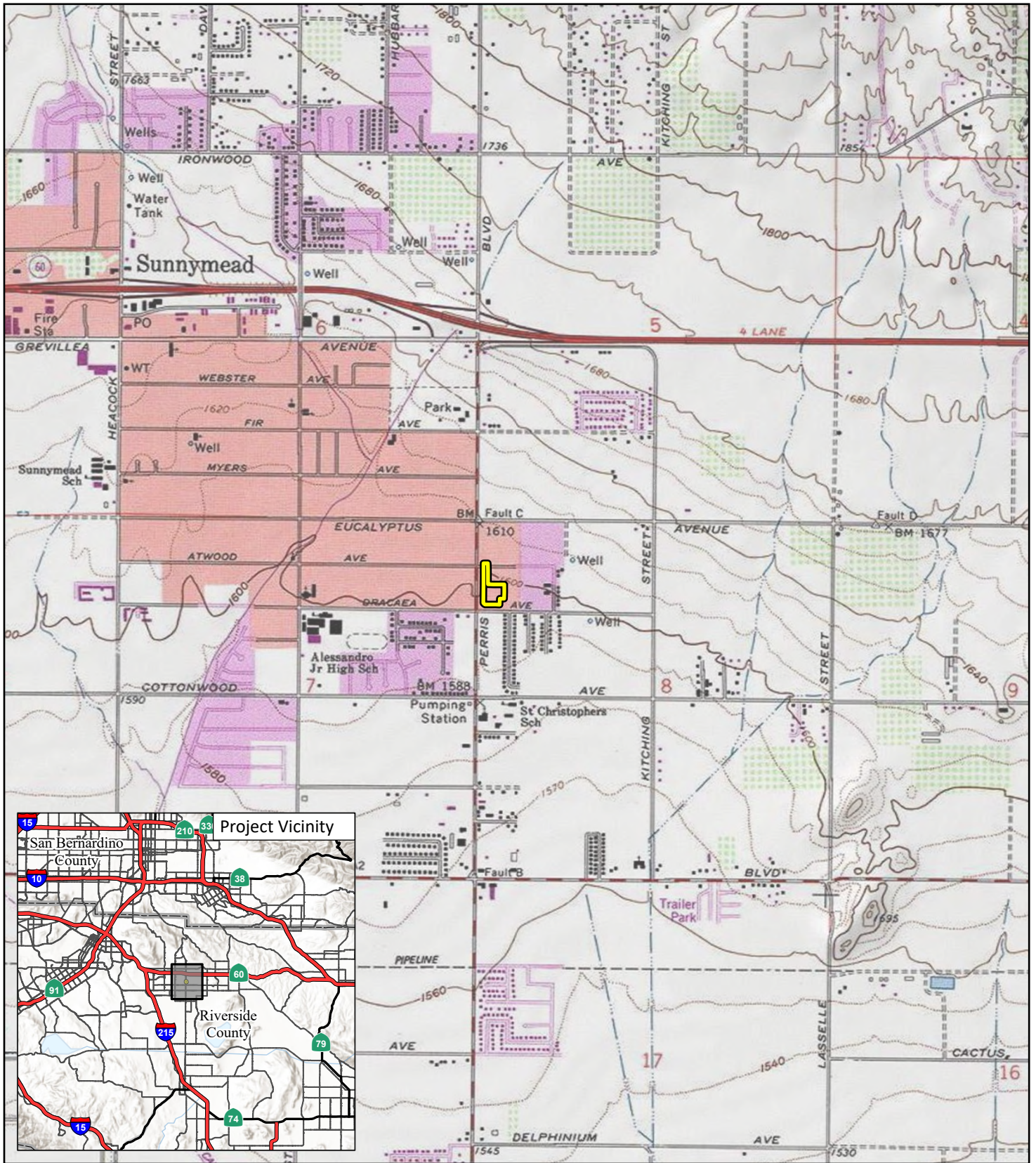

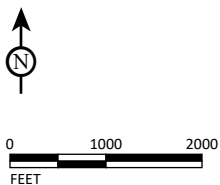


FIGURE 1

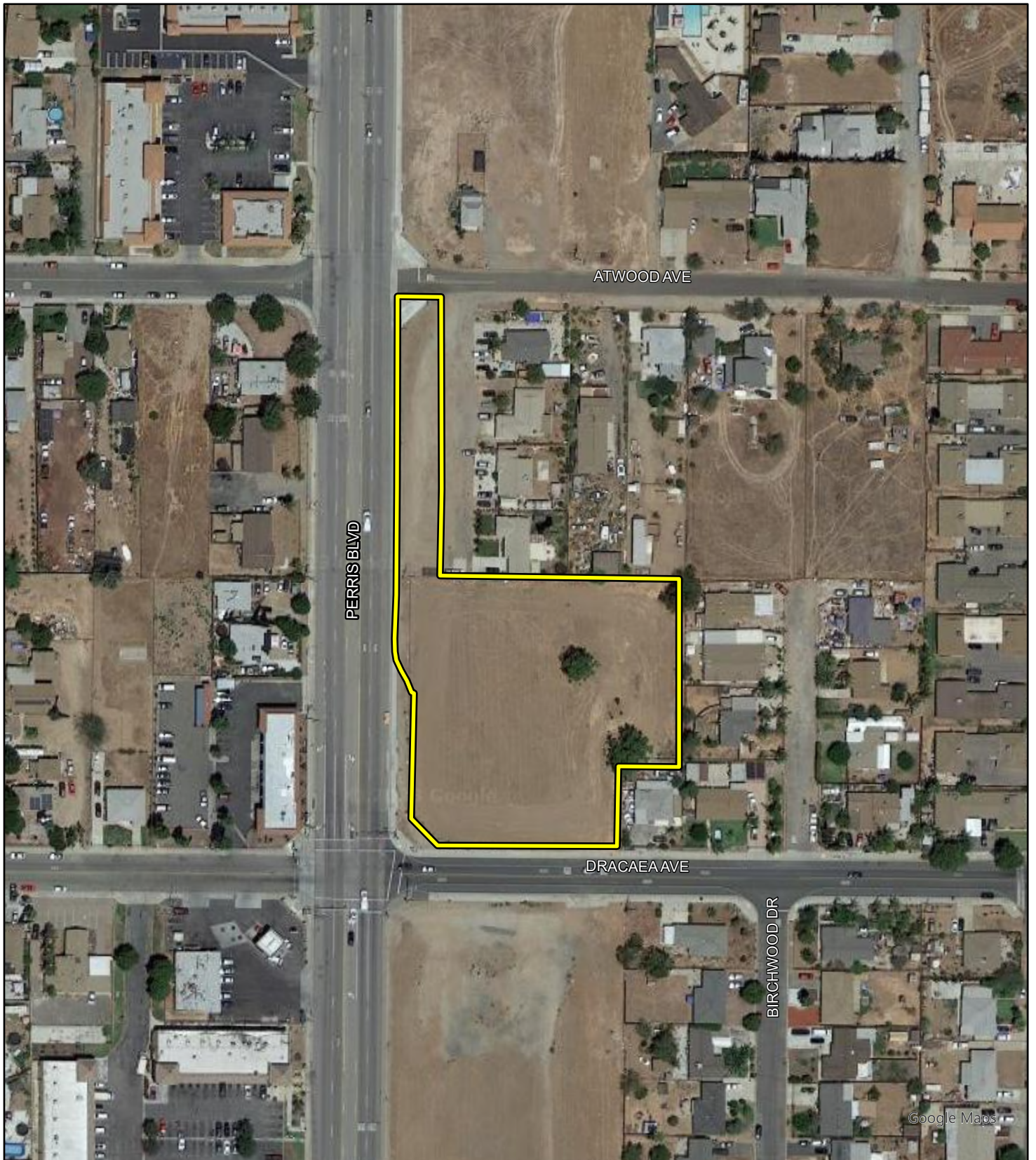
 Project Site



Moreno Valley Express Car Wash and Commercial Development Project
Regional and Project Location

SOURCE: USGS 7.5' Quad - Sunnymead (1980), CA

J:\20231436\GIS\Pro\Moreno Valley Express Car Wash and Commercial Development Project\Moreno Valley Express Car Wash and Commercial Development Project.aprx (9/7/2023)



ATWOOD AVE

PERRIS BLVD

DRACAEA AVE

BIRCHWOOD DR

Google Maps

LEGEND

 Project Site

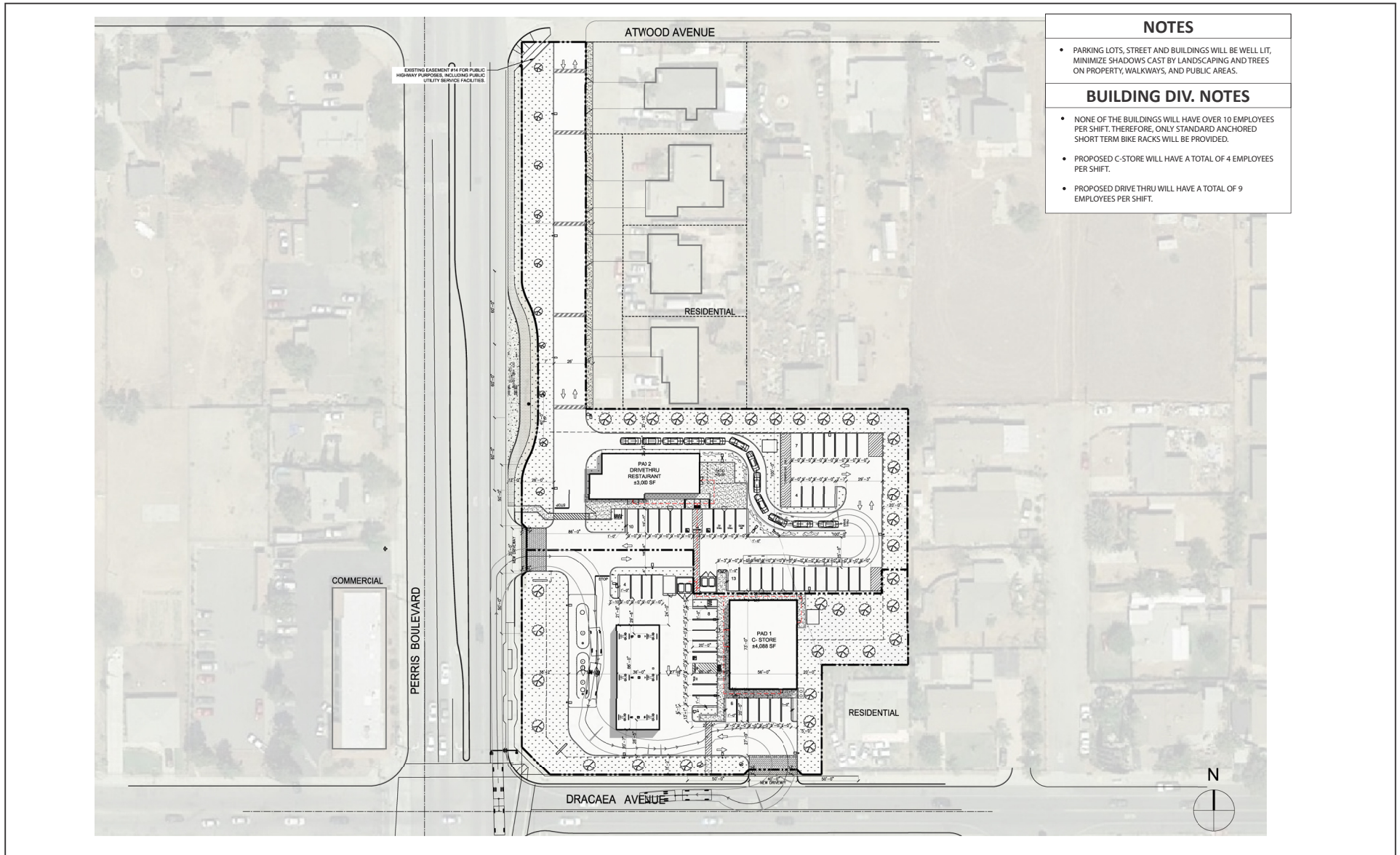
FIGURE 2



0 75 150
FEET

SOURCE: Google Maps

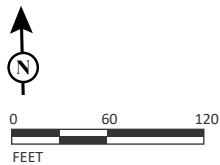
Moreno Valley Express Car Wash and Commercial Development Project
Existing Setting



- NOTES**
- PARKING LOTS, STREET AND BUILDINGS WILL BE WELL LIT, MINIMIZE SHADOWS CAST BY LANDSCAPING AND TREES ON PROPERTY, WALKWAYS, AND PUBLIC AREAS.
- BUILDING DIV. NOTES**
- NONE OF THE BUILDINGS WILL HAVE OVER 10 EMPLOYEES PER SHIFT, THEREFORE, ONLY STANDARD ANCHORED SHORT TERM BIKE RACKS WILL BE PROVIDED.
 - PROPOSED C-STORE WILL HAVE A TOTAL OF 4 EMPLOYEES PER SHIFT.
 - PROPOSED DRIVE THRU WILL HAVE A TOTAL OF 9 EMPLOYEES PER SHIFT.

LSA

FIGURE 3



SOURCE: Cadence Capital Investments LLC; June 2020

Moreno Valley Express Car Wash and Commercial Development Project
Approved Project Site Plan

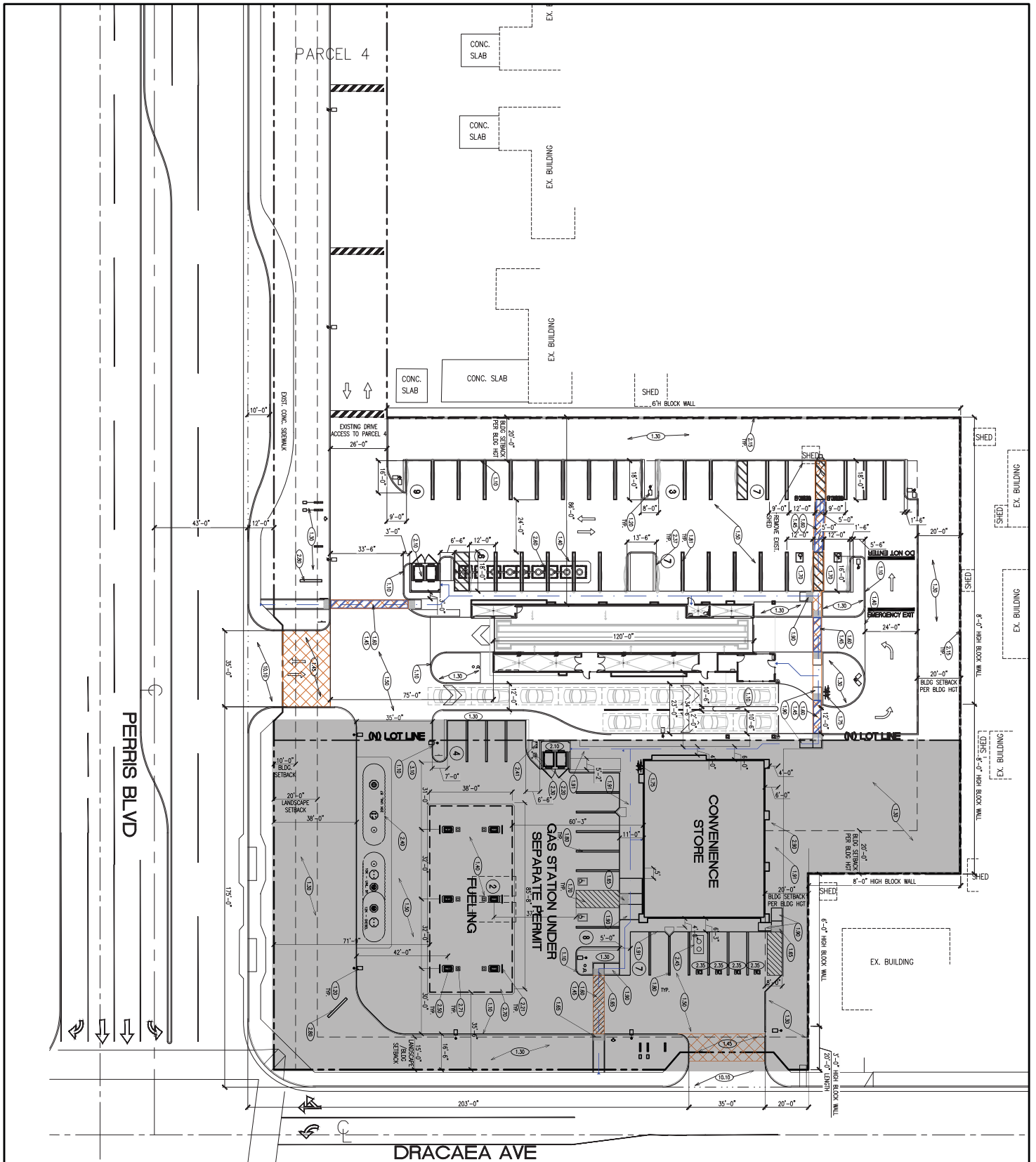


FIGURE 4

*NOTE: The shaded area is part of the approved project.

LSA



0 30 60
FEET

SOURCE: CJC Design, Inc.

I:\20231436\GIS\Site Plan2.ai (3/19/2025)

Moreno Valley Express Car Wash and Commercial Development Project
Proposed Project Site Plan

ATTACHMENT B
CALEEMOD RESULTS FOR PROPOSED PROJECT AND APPROVED PROJECT

ATTACHMENT C
MSHCP CONSISTENCY ANALYSIS AND BIOLOGY REPORT UPDATE

ATTACHMENT D
CULTURAL RESOURCES ASSESSMENT REVALIDATION

ATTACHMENT E
SUPPLEMENTAL GEOTECHNICAL EVALUATION

ATTACHMENT F
PHASE I ENVIRONMENTAL SITE ASSESSMENT

ATTACHMENT G
MORENO VALLEY EXPRESS CAR WASH DRIVE-THRU EVALUATION

**ATTACHMENT H
FINAL HYDROLOGY REPORT**

**ATTACHMENT I
PROJECT SPECIFIC WATER QUALITY MANAGEMENT PLAN**

**ATTACHMENT J
NOISE IMPACT ANALYSIS**

**ATTACHMENT K
TRAFFIC SCOPING FORM**

ATTACHMENT L
VEHICLE MILES TRAVAELED SCREENING EVALUATION

ATTACHMENT M
CAR WASH WATER USAGE INFORMATION

ATTACHMENT N
APPROVED PROJECT MITIGATION MONITORING AND REPORTING PROGRAM